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May 15, 2026

Low-Income Housing Tax Credit Program
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, South Carolina 29210

Re: Abandoned Building Tax Credits – Broughton Senior SC, LLC (the “Owner”)

Ladies and Gentlemen:

This opinion is rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program in connection with South Carolina Abandoned Building Tax Credits.

Licensure and Competency:

The undersigned is a South Carolina licensed attorney. A significant portion of my practice relates to tax incentives and credit matters including Abandoned Building Revitalization Credit (SC) and the interpretation of the Internal Revenue Code of 1986 (the “Code”), as amended.

Legal Authority:

This opinion relies only on Abandoned Building Tax Credit rules and guidance, set forth in S.C. Code Ann. § 12-67-100 (2025) et seq., S.C. Rev. Rul. #26-1 (S.C. Dep’t of Revenue 2026), S.C. Rev. Rul. #15-2 (S.C. Dep’t of Revenue 2015), and S.C. Information Letter #15-9 (S.C. Dep’t of Revenue 15-12) (collectively, the “Authority”).

Transaction Documents:

I have advised the Owner in seeking the following (collectively the “Credit Documents”): 1) the Resolution by the City of Orangeburg dated January 6, 2026 certifying the Property (as defined therein) as qualifying as an “Abandoned Building” and “Building Site” as defined in the Authority; and 2) the Affidavit signed and notarized as of November 20, 2025 from and by the Property’s prior owner, Shady Grove Plantation and Nursery Inc., attesting to the abandonment.

Opinion

Based upon my knowledge of the Authority and in reliance on the Credit Documents, I am of the opinion that 1) at least one structure on the Property is an Abandoned Building; 2) that, by law, one structure may be subdivided into different units or parcels; 3) that the City of Orangeburg properly certified the Property

as an Abandoned Building Site in compliance with the Authority, and 4) as such, certain qualifying expenses associated with the development of the Property will qualify for Abandoned Building Revitalization credits.

Reliance

It is my intention that the South Carolina State Housing Finance and Development Authority may rely on this opinion as part of its determination whether or not to offer a reservation of the Low-Income Housing Tax Credit to this development.

Very truly yours

A handwritten signature in blue ink, appearing to read "J. P. Land, Jr.", with a stylized flourish at the end.

J. Philip Land, Jr.
SC Bar No. 100157