



December 5, 2018

Ms. Bonita Shropshire, Executive Director
Ms. Laura Nicholson, Program Director
SCSHFDA (SC Housing)
Delivered Via Email

Re: Low Income Housing Tax Credit (LIHTC) Program

Dear Ms. Stropshire and Ms. Nicholson:

Thank you in advance for consideration of this letter. My name is Brian Samson, and I have been employed within the banking industry for thirty-two (32) years. I have spent my career in one of two capacities, developing business relationships and sustainable commercial loan portfolios for banks, and, serving in credit administration for loan approval and regulatory compliance for bank loan portfolios. The bulk of my career and experience has been with BB&T and Ameris Bank, and I am still with Ameris Bank located in Columbia, SC. My banking experiences include extensive involvement in construction and development financing, and related management for many types of projects, including multi-family housing, both conventional/market based as well as subsidized (such as the LIHTC Program).

In recent conversations with some of the developers I know and periodically work with, I was apprised of potential changes that are being considered for your LIHTC Program (2019 QAP). The most significant issue I heard was a substantial reduction in credit (or, points) for Developer Experience as well as SC Program Experience. From a banking and project investor perspective, this is an issue that would impact underwriting considerations. Having developers that are experienced and financially sound for many years is a significant underwriting consideration. Additionally, having developers that are familiar and experienced with local and State matters, and that have been licensed to do business consistently in particular market areas is also a very important underwriting consideration.

I am sure you are taking in and considering a wealth of information with regards to your ongoing program which has been extremely successful over the years. Thank you for considering my comments, and please give me a call (803-733-3675) if I can answer any questions or provide additional information.

With Kindest Regards,

A handwritten signature in black ink, appearing to read 'BRS'.

Brian R. Samson
SVP Commercial Banking
Ameris Bank

