

RESOLUTION NO.: R-2017-113

Certifying 1519 Sumter Street and 1220-1224 Taylor Street as Abandoned Buildings Pursuant to the South Carolina Abandoned Buildings Revitalization Act, Title 12, Chapter 67, Section 12-67-100 et seq., of the South Carolina Code of Laws (1976), as amended, regarding property located at 1519 Sumter Street and 1220-1224 Taylor Street, City of Columbia, TMS# 09014-09-05 and 09014-09-07

ORIGINAL
STAMPED IN RED

WHEREAS, the South Carolina Abandoned Buildings Revitalization Act of 2013 (the "Act") was enacted in Title 12, Chapter 67 of the South Carolina Code of Laws to create an incentive for the rehabilitation, renovation and redevelopment of abandoned buildings located in South Carolina; and,

WHEREAS, the Act provides that restoration of abandoned buildings into productive assets for the communities in which they are located serves a public and corporate purpose and results in job opportunities; and,

WHEREAS, Section 12-67-120 of the Act provides the following definitions (in pertinent part):

(1) "Abandoned Building" means a building or structure, which clearly may be delineated from other buildings or structures, at least sixty-six percent of the space in which has been closed continuously to business or otherwise nonoperational for income producing purposes for a period of at least five years immediately preceding the date on which the taxpayer files a "Notice of Intent to Rehabilitate". For purposes of this item, a building or structure that otherwise qualified as an "abandoned building" may be subdivided into separate units or parcels, which units or parcels may be owned by the same taxpayer or different taxpayers, and each unit or parcel is deemed to be an abandoned building site for purposes of determining whether each subdivided parcel is considered to be abandoned.

(2) "Building Site" means the abandoned building together with the parcel of land upon which it is located and other improvements located on the parcel. However, the area of the building site is limited to the land upon which the abandoned building is located and the land immediately surrounding such building used for parking and other similar purposes directly related to the building's income producing use; and,

WHEREAS, Section 12-67-140 of the Act provides that a taxpayer who rehabilitates an abandoned building is eligible either for a credit against certain income taxes, license fees or premium taxes, or a credit against local real property taxes; and,

WHEREAS, Sumter, LLC ("Sumter" or the "Taxpayer") is the owner and developer of certain real property located at 1519 Sumter Street, Columbia, South Carolina, as referenced in deed dated November 17, 2005 and recorded November 18, 2005 in the Richland County Register of Deeds Office in Book 1122 at Page 2634, which property is further identified on Richland County Tax Maps as TMS No. 09014-09-07, and certain real property located at 1220-1224 Taylor Street, Columbia, South Carolina, as referenced in deed dated December 22, 2015 and recorded December 29, 2015 in the Richland County Register of Deeds Office in Book 2078 at Page 2466, which property is further identified on Richland County Tax Maps as TMS No. 09014-09-05 (collectively, the "Property"); and,

WHEREAS, on October 19, 2016, Sumter filed four Notices of Intent to Rehabilitate the Property with the South Carolina Department of Revenue; and,

WHEREAS, Sumter has taken steps to subdivide the Property into four (4) separate and distinct condominium units (the "Building Sites") as shown in Exhibits A, B, and C, attached hereto; and,

WHEREAS, the Property is located within the city limits of Columbia, South Carolina; and,

WHEREAS, the Taxpayer has requested that the City certify that the Building Sites are abandoned as defined by Section 12-67-120; NOW THEREFORE,

ORIGINAL
STAMPED IN RED

BE IT RESOLVED by the Mayor and City Council this 21st day of November, 2017, that the City of Columbia makes the following certifications as requested by Sumter, LLC under the South Carolina Abandoned Buildings Revitalization Act of 2013 (S.C. Code Section 12-67-100, et seq.):

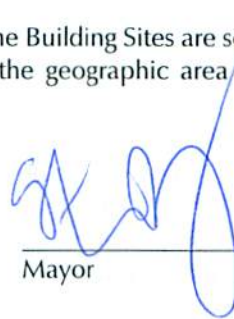
Section 1. The Taxpayer has submitted to the City a request to certify each of the Building Sites pursuant to Section 12-67-160 of the Act (the "Request to Certify").

Section 2. The City has reviewed the Request to Certify, conferred with the Taxpayer and conducted a review of its records concerning the Property.

Section 3. The City hereby certifies that (i) each of the Building Sites are separate abandoned building sites as defined in Section 12-67-120(1) of the Act, and (ii) the geographic area of each of the Building Sites is consistent with Section 12-67-120(2) of the Act.

Requested by:

Assistant City Manager Gentry



Mayor

Approved by:



City Manager

Approved as to form:




City Attorney

Introduced:

Final Reading:

ATTEST:



City Clerk

ORIGINAL
STAMPED IN RED

RESOLUTION NO.: R-2017-113
EXHIBIT A
LEGAL DESCRIPTION OF PROPERTY

PARCEL A (1517-1519 SUMTER STREET):

ALL that lot, piece, or parcel of land, with all improvements thereon, situate, lying and being on the west side of Sumter Street, between Hampton and Taylor Streets, in the City of Columbia, County of Richland, State of South Carolina, being familiarly known as 1517 Sumter Street, which said lot is in shape a rectangular parallelogram, measuring on the northern and southern sides of one hundred fifty-eight (158) feet, more or less; on its eastern and western sides fifty-two (52) feet, more or less; and is bounded on the north by lot now or formerly of Price, Greever and Lillard, on the east by said Sumter Street, whereon it fronts, on the south by property hereinbelow described and Southern Bell Telephone & Telegraph Company, and on the west by lot now or formerly of Ben M. Webber, and others.

ALSO: ALL that lot or parcel of land, situate, lying and being within the square bounded by Hampton, Taylor, Sumter and Main Streets, in the City of Columbia, County of Richland, State of South Carolina, measuring eight-one (81) feet on its northern and southern sides, and two (2) feet on its eastern and western sides, and bounded north by the alleyway of Jenkins Automotive Parts Service, Inc., east by Sumter Street, south by land now or formerly of Ben M. Webber, and west by the strip of land conveyed by Ben M. Webber to Jenkins Automotive Parts Service, Inc., on the 21st day of November 1929.

ALSO: ALL that lot or parcel of land situate, lying and being within the square bounded by Hampton, Taylor, Sumter and Main Streets, in the City of Columbia, County of Richland, State of South Carolina, measuring forty (40) feet on its northern and southern sides, and bounded north by property belonging to Jenkins Automotive Parts Service, Inc.; east by lands of Jenkins Automotive Parts Service, Inc.; south by lands now or formerly of Ben M. Webber; and west by lands of Southern Bell Telephone & Telegraph Company.

This being the identical property conveyed unto Sumter, LLC by Deed of Cambridge Investment Company, dated November 17, 2005, and recorded in the Office of the Register of Deeds for Richland County, South Carolina on November 18, 2005, in Book 1122, at Page 2634.

TMS#R09014-09-07

PARCEL B (1220-1224 TAYLOR STREET):

ALL that certain piece, parcel or lot of land with the improvements thereon, situate, lying and being on the southern side of Taylor Street, between Main Street and Sumter Street, the northeastern most corner of said property being 87.7 feet west of the southwestern corner of the intersection of Sumter Street and Taylor Street, in the City of Columbia, in the County of Richland, in the State of South Carolina, being shown and delineated on a plat prepared for Baptist Healthcare Systems of South Carolina, Inc. by Cox and Dinkins, Inc., dated June 16, 1995, recorded on or about the recording date hereof, and having such metes, bounds, bearings and distances as shown on said plat which is incorporated herein by reference, as follows: Beginning at the northeast corner of the property on Taylor Street, at an iron pin eighty-seven and seven-tenths (87.7') feet west of the intersection of the southwest corner of Sumter Street and Taylor Street, and running thence along property now or formerly of Victory Savings Bank S 21° 11' 00" E for a distance of one hundred (100.00') feet to a nail; thence turning and running along property now or formerly of Victory Savings Bank N 68° 33' 00" E for a distance of eighty-seven and eight-five one hundredths (87.85') feet to a nail on the western right-of-way line of Sumter Street; thence turning and running along the said right-of-way line of Sumter Street S 21° 19' 52" E for a distance of fifty-eight (58.00') feet to an x in concrete; thence turning and running along property now or formerly of Cambridge Investment Company S 69° 06' 57" W for a distance of one hundred fifty-eight (158.00') feet to a

ORIGINAL
STAMPED IN RED

rebar; thence turning and running along property now or formerly of Cambridge Investment Company S 21° 11' 23" E for a distance of eighty-four one-hundredths (.84') feet to a point; thence continuing along property now or formerly of Cambridge Investment Company S 21° 11' 23" E for a distance of fifty-three and seventy one-hundredths (153.70') feet to an x in concrete; thence turning and running along property now or formerly of S. C. Baptist Hospital S 68° 26' 57" W for a distance of nine (9.00') feet to an x in concrete; thence turning and running along property now or formerly of Daisy W. Moody N 21° 11' 10" W for a distance of two hundred eleven and fifty one-hundredths (211.50') feet to a point on the southern right-of-way line of Taylor Street; thence turning and running along the said right-of-way line of Taylor Street N 68° 55' 02" E for a distance of seventy-nine (79.00') feet to the point of beginning, be all measurements a little more or less and containing 0.41 acres (17,955 square feet).

TOGETHER WITH the appurtenant right to use in common with all other persons who may have the like right, as provided in the deed below mentioned, a strip of land thirteen (13.0') feet in width extending in a westerly direction from the southern most thirteen (13.0') feet of the above-described property across the southern most thirteen (13.0') feet of land now or formerly of Daisy W. Moody and Triple C Limited Partnership for a distance of forty-five and thirty-three one-hundredths (45.33') feet to property now or formerly of Evergreen Corporation of Columbia and Reyner Family Partnership as shown on a plat prepared for Hampton Number Three, Inc. by W. Frank McAulay, Jr., R.L.S. dated September 21, 1990, and recorded in the RMC Office for Richland County in Plat Book 53 at Page 3513, as an open court or way, the same being particularly described in a certain deed of conveyance made by Black and Coulter Company to Wm. D. Simpson and Wm J. Taylor, dated June 4, 1912, and recorded in the Office of the RMC for Richland County, South Carolina in Book of Deeds AU, Page 533;

ALSO TOGETHER WITH the appurtenant right to use for access, ingress and egress in common with all other persons who may have a like right, a strip of land eight (8.0') feet in width over and along with western edge of the lot conveyed by Black and Coulter Company to Wm. D. Simpson and Wm J. Taylor as aforesaid, extending from said court and way last above mentioned southwardly to Hampton Street, as particularly described in the said deed from Black and Coulter to said Wm. D. Simpson and Wm. J. Taylor, and as shown on a plat prepared for Hampton Number Three, Inc. by W. Frank McAulay, Jr., R.L.S. dated September 21, 1990, and recorded in the RMC Office for Richland County in Plat Book 53, at Page 3513.

This being the identical property conveyed unto Sumter, LLC by Deed of Baptist Healthcare System of South Carolina, Inc., dated December 22, 2015, and recorded in the Office of the RMC for Richland County, South Carolina on December 29, 2015 in Deed Book 2078, at Page 2466.

TMS #R9014-09-05

ORIGINAL
STAMPED IN RED

**RESOLUTION NO.: R-2017-113
EXHIBIT B**

Notes to Floor Plans
SUMTER TAYLOR HORIZONTAL PROPERTY REGIME
NOTES

This Exhibit "B" includes an as-built survey showing the location of the Buildings and other improvements on the Property (the "Plat" or "Site Plan"), said Plat prepared by Baxter Land Surveying Company, Inc. for 1224 Taylor Street LLC, dated October 26, 2015, recorded in the Richland County Office of the Register of Deeds at Book 2151 at page 3402. The Plat also shows the location of an alleyway and concrete parking area which shall be Common Elements or Limited Common Elements. Exhibit "C" includes a set of floor plans of each Unit (collectively, the "Floor Plans"), which shows graphically the dimensions, area and location of each Unit therein (Exhibit B & C collectively sometimes referred to herein as the "Plans"). Said Exhibits further include the matters set forth below:

The Property has three buildings, the Powell Furniture Building, Western Auto Building and the Rose Talbot Building, containing a total of four condominium Units.

The Powell Furniture Building contains two Units more particularly described as Units 1 and 2. Unit 1 contains 10,597 square feet and includes the basement level and ground level of the Powell Furniture Building. Unit 1 includes a 208 square foot Basement Exit Stairway providing access the basement level of Unit 1 from the alleyway located along the southern side of the Powell Furniture Building into the basement level of Unit 1. Unit 2 contains 6,684 square feet and includes the second level of the Powell Furniture Building. Unit 2 includes the portion of the ground level containing the 366 square feet Unit 2 Ground Level Stairway access area to Unit 2 from the ground level and located on the eastern side of the Powell Furniture Building. Unit 2 includes the portion of the second level containing the 166 square feet Unit 2 Ground Level Stairway access area to Unit 2 from the ground level. Unit 2 also shares with Units 3 and 4 the use and benefit of the Limited Common Element 190 square feet Exterior Stairway located on the western exterior wall the Powell Furniture Building. Units 1, 2 and 3 also share the exclusive use and benefit of the Limited Common Element Elevator occupying 68 square feet as shown on the Plans.

The Western Auto Building contains one Unit more particularly described as Unit 3. Unit 3 is two stories and contains 10,306 square feet. Units 1, 2 and 3 also share the exclusive use and benefit of the Limited Common Element Elevator occupying 68 square feet as shown on the Plans. Unit 3 also enjoys with Unit 4 the exclusive use and benefit of the Limited Common Element 133 square feet Access Hallway. This Access Hallway provides Unit 3 and 4 access to the 190 square feet Exterior Stairway.

The Rose Talbot Building contains one Unit more particularly described as Unit 4. Unit 4 is two stories and contains 6,219 square feet. Unit 4 also shares with Unit 2 and 4 the use and benefit of the Limited Common Element 190 square feet Exterior Stairway located on the western exterior wall the Powell Furniture Building. The Rose Talbot Building also includes a Limited Common Element 133 square feet Access Hallway for the exclusive use and benefit of Units 3 and 4. This Access Hallway provides Unit 3 and 4 access to the 190 square feet Exterior Stairway. The use of the terms "apartment," "apartments" or "rental apartments" are used for convenience in describing the composition of the Units, and shall not have the same meaning of the term condominium "Unit."

ADDITIONAL DESCRIPTION DETAILS:

Reference to area as Common Areas/Common Elements and Limited Common Areas/Limited Common Elements in this Exhibit B will be in addition to and read in conjunction with the further designations of Common Areas and Common Elements set out in other portions of this Master Deed and the Plat and Floor Plans making up the balance of the Plans contained herein.

STAMPED IN RED

EXHIBIT C

FLOOR PLANS

[FLOOR PLANS ATTACHED]

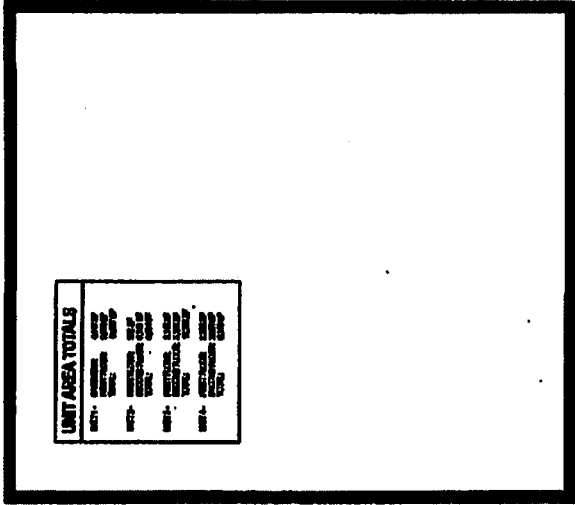
SUTHER TAYLOR HORIZONTAL
PROPERTY RECORDS
COLUMBIA, MO



The Boudreau Group
1111 North 1st Street
St. Louis, Missouri 63102
314.433.1111

SUMNER STREET

TAYLOR STREET



UNIT AREA TOTALS

UNIT 1	5,680
UNIT 2	305
UNIT 3	6,145
UNIT 4	3,250
UNIT 1, 2 AND 3	60
UNIT 2, 3 AND 4	180
UNIT 1 BASEMENT	64
UNIT 2, 3 AND 4 EXTERIOR	180
TOTAL	16,424

PARKING AREA

UNIT 1
FIRST FLOOR:
5,680 SQUARE FEET FLOOR AREA

UNIT 2
GROUND LEVEL STAIRWAY:
305 NET SQUARE FEET

UNIT 3
FIRST FLOOR AREA:
6,145 SQUARE FEET FLOOR AREA

UNIT 4
FIRST FLOOR AREA:
3,250 SQUARE FEET FLOOR AREA

UNIT 1, 2 AND 3
LIMITED COMMON ELEMENT ELEVATOR:
60 NET SQUARE FEET

UNIT 2, 3 AND 4
EXTERIOR STAIRWAY:
180 NET SQUARE FEET

UNIT 1
BASEMENT EXIT STAIRWAY:
64 NET SQUARE FEET

POWELL
FURNITURE
BUILDING

UNIT FLOOR PLANS - FIRST FLOOR

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1519 Sumter Street, Unit 1 (Powell Furniture Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

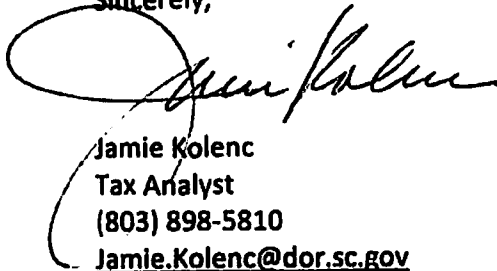
(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

"Notice of Intent to Rehabilitate" means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer's intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc
Tax Analyst
(803) 898-5810
Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue
Attn: Tax Credits
P.O. Box 11189
Columbia, SC 29211-1189
dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1519 Sumter Street, Unit 2 (Powell Furniture Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

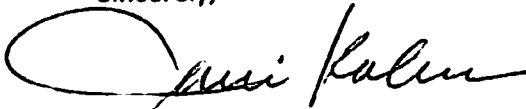
(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc

Tax Analyst

(803) 898-5810

Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue

Attn: Tax Credits

P.O. Box 11189

Columbia, SC 29211-1189

dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1224 Taylor Street, Unit 3 (Western Auto Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

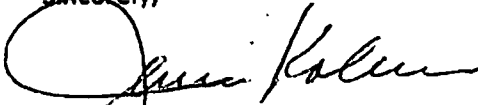
(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc

Tax Analyst

(803) 898-5810

Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue

Attn: Tax Credits

P.O. Box 11189

Columbia, SC 29211-1189

dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1220 Taylor Street, Unit 4 (Rose Talbot Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc

Tax Analyst

(803) 898-5810

Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue

Attn: Tax Credits

P.O. Box 11189

Columbia, SC 29211-1189

dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1519 Sumter Street, Unit 1 (Powell Furniture Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

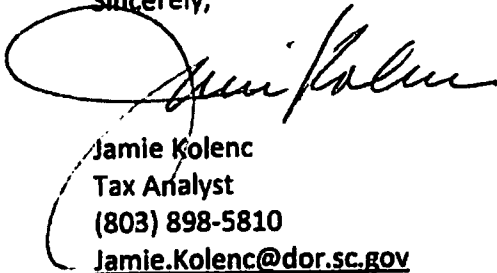
(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc
Tax Analyst
(803) 898-5810
Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue
Attn: Tax Credits
P.O. Box 11189
Columbia, SC 29211-1189
dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1519 Sumter Street, Unit 2 (Powell Furniture Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

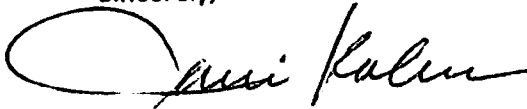
(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc
Tax Analyst
(803) 898-5810
Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue
Attn: Tax Credits
P.O. Box 11189
Columbia, SC 29211-1189
dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1224 Taylor Street, Unit 3 (Western Auto Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc

Tax Analyst

(803) 898-5810

Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue

Attn: Tax Credits

P.O. Box 11189

Columbia, SC 29211-1189

dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

State of South Carolina
Department of Revenue
300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214

October 20, 2016

Rogers, Lewis, Jackson, Mann & Quinn, LLC
Attn: Christian L. Rogers
1330 Lady Street, Suite 400
Columbia, SC 29201

RE: Sumter, LLC

Dear Taxpayer,

Per your instructions, this letter acknowledges receipt of your Notice of Intent to Rehabilitate 1220 Taylor Street, Unit 4 (Rose Talbot Building) in Columbia, South Carolina in compliance with the South Carolina Abandoned Buildings Revitalization Act, codified in Chapter 67, Title 12, South Carolina Code of Laws.

S.C. Code § 12-67-140 provides in part:

(A) Subject to the terms and conditions of this chapter, a taxpayer who rehabilitates an abandoned building is eligible for either:

(1) a credit against income taxes imposed pursuant to Chapter 6 and Chapter 11 of this title, corporate license fees pursuant to Chapter 20 of this title, taxes on associations pursuant to Chapter 13 of this title, or insurance premium taxes, including retaliatory taxes, imposed by Chapter 7, Title 38, or a combination of them; or

(2) a credit against real property taxes levied by local taxing entities.

* * *

(C) If the taxpayer elects to receive the credit pursuant to subsection (A)(2), the following provisions apply:

* * *

(2) Once the Notice of Intent to Rehabilitate has been provided to the county or municipality, the municipality or the county first shall determine, by resolution, the eligibility of the building site and the proposed rehabilitation expenses for the credit. A proposed rehabilitation of a building site must be approved by a positive majority vote of the local governing body. For purposes of this subsection, "positive majority vote" is as defined in Section 6-1-300(5). If the county or municipality determines that the building site and the proposed rehabilitation expenses are eligible for the credit, there must be a public hearing and the municipality or county

shall approve the building site for the credit by ordinance. Before approving a building site for the credit, the municipality or county shall make a finding that the credit does not violate a covenant, representation, or warranty in any of its tax increment financing transactions or an outstanding general obligation bond issued by the county or municipality. ...S.C. Code § 12-67-120(7) provides;

“Notice of Intent to Rehabilitate” means a letter submitted by the taxpayer to the department or the municipality or county as specified in this chapter, indicating the taxpayer’s intent to rehabilitate the building site, the location of the building site, the amount of acreage involved in the building site, the amount of square footage of existing buildings involved in the building site, and the estimated expenses to be incurred in connection with rehabilitation of the building site. The notice also must set forth information as to which buildings the taxpayer intends to renovate and whether new construction is to be involved.

No additional information is requested at this time.

Sincerely,



Jamie Kolenc

Tax Analyst

(803) 898-5810

Jamie.Kolenc@dor.sc.gov

South Carolina Department of Revenue

Attn: Tax Credits

P.O. Box 11189

Columbia, SC 29211-1189

dor.sc.gov

NOTE: The information in this message and/or attachments may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to this message and deleting it from your computer.

COPY

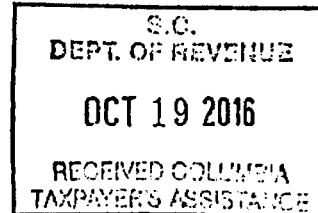
ROGERS LEWIS

ATTORNEYS AT LAW

Christian L. Rogers
Direct: (803) 403-8820
crogers@rogerslewis.com

October 19, 2016

Abandoned Building Credit Notice
Research and Forms Development
South Carolina Department of Revenue
Columbia, SC 29214-0019



RE: Notice of Intent to Rehabilitate
Unit 4 of the Sumter Taylor Horizontal Property Regime
Rose Talbot Building, 1220 Taylor Street, Columbia, SC

Dear Sir/Madam,

I am writing on behalf of my client, Sumter, LLC (the "Taxpayer"), with respect to the above-noted abandoned building site in Richland County (the "Building Site"). Pursuant to S.C. Code Sections 12-67-140(B)(1) and 12-67-120(7) and Revenue Ruling 15-7, this letter shall serve as my client's notice of intent to rehabilitate the Building Site in a manner that qualifies for state tax credits under the Abandoned Building Revitalization Act of 2013 (the "Act").

The Taxpayer intends to restore and convert the existing building on the Building Site, into commercial/retail space for lease to one or more commercial/retail tenants. The taxpayer does not plan to demolish any existing buildings, but will construct an addition to the existing building by adding a second level to the rear portion of the building.

The following specific information regarding the rehabilitation is provided pursuant to S.C. Code Section 12-67-120(7) and South Carolina Revenue Ruling 15-7:

- **Statement of Intent:** The Taxpayer intends to rehabilitate the Building Site in a manner that qualifies for state tax credits under the Act.
- **Location:** 1220 Taylor Street, Columbia, SC 29201. This is a portion of Richland County Tax Map No. 09014-09-05.
- **New construction:** The existing building will be expanded by approximately 2,065 square feet, for a total building size of approximately 6,798 square feet. The expansion will consist of adding a second level to the rear portion of the building.
- **Acreage:** The Building Site is known as the Rose Talbert Building, which is situated on a portion of the parcel of land bearing Richland County Tax Map No. 09014-09-05 and is approximately 0.092 acres, more or less, in size.

- **Square footage of Existing Buildings:** The existing building on the Building Site contains approximately 4,733 square feet.
- **Buildings to be Renovated:** The Taxpayer intends to renovate the existing buildings in the Building Site.
- **Estimated Rehabilitation Expenses:** \$1,600,000.

The taxpayer elects to receive the income tax credit in the amount of 25% of actual rehabilitation expenses allowed under S.C. Code Section 12-67-140(A)(1).

Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

ROGERS LEWIS JACKSON MANN & QUINN, LLC



Christian L. Rogers

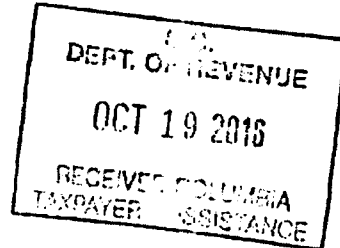
ROGERS LEWIS
ATTORNEYS AT LAW

COPY

Christian L. Rogers
Direct: (803) 403-8820
crogers@rogerslewis.com

October 19, 2016

Abandoned Building Credit Notice
Research and Forms Development
South Carolina Department of Revenue
Columbia, SC 29214-0019



**RE: Notice of Intent to Rehabilitate
Unit 2 of the Sumter Taylor Horizontal Property Regime
Powell Furniture Building, 1519 Sumter Street, Columbia, SC**

Dear Sir/Madam,

I am writing on behalf of my client, Sumter, LLC (the "Taxpayer"), with respect to the above-noted abandoned building site in Richland County (the "Building Site"). Pursuant to S.C. Code Sections 12-67-140(B)(1) and 12-67-120(7), this letter shall serve as my client's notice of intent to rehabilitate the Building Site in a manner that qualifies for state tax credits under the Abandoned Building Revitalization Act of 2013 (the "Act").

The Taxpayer intends to restore and convert the existing building on the Building Site into a commercial space for income producing purposes. The taxpayer does not plan to construct any new buildings or demolish any existing buildings, but it will perform site work on land surrounding the structure and related to its income producing use.

The following specific information regarding the rehabilitation is provided pursuant to S.C. Code Section 12-67-120(7):

- **Statement of Intent:** The Taxpayer intends to rehabilitate the Building Site in a manner that qualifies for state income tax credits under the Act.
- **Location:** 1519 Sumter Street, Unit 2, Columbia, SC 29201. Unit 2 has the meaning attributed to it under the Sumter Taylor Horizontal Property Regime. This is a portion of Richland County TMS No. 09014-09-07.
- **New construction:** No new buildings will be constructed on the Building Site as part of the rehabilitation.
- **Acreage:** The Building Site is a portion of the property located at 1519 Sumter Street in Columbia, SC, bearing Richland County TMS No. 09014-09-07, which is approximately 0.196 acre, more or less, in size.

- **Square footage of Existing Buildings:** The existing building on the Building Site contains approximately 6,763 square feet.
- **Buildings to be Renovated:** The Taxpayer intends to renovate the existing building in the Building Site.
- **Estimated Rehabilitation Expenses:** \$1,600,000.

The taxpayer elects to receive the income tax credit in the amount of 25% of actual rehabilitation expenses allowed under S.C. Code Section 12-67-140(A)(1).

Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

ROGERS LEWIS JACKSON MANN & QUINN, LLC



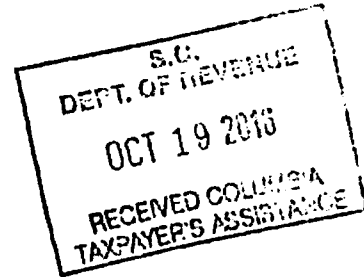
Christian L. Rogers

COPY

ROGERS LEWIS
ATTORNEYS AT LAW

Christian L. Rogers
Direct: (803) 403-8820
crogers@rogerslewis.com

October 19, 2016



Abandoned Building Credit Notice
Research and Forms Development
South Carolina Department of Revenue
Columbia, SC 29214-0019

RE: Notice of Intent to Rehabilitate
Unit 1 of the Sumter Taylor Horizontal Property Regime
Powell Furniture Building, 1519 Sumter Street, Columbia, SC

Dear Sir/Madam,

I am writing on behalf of my client, Sumter, LLC (the "Taxpayer"), with respect to the above-noted abandoned building site in Richland County (the "Building Site"). Pursuant to S.C. Code Sections 12-67-140(B)(1) and 12-67-120(7), this letter shall serve as my client's notice of intent to rehabilitate the Building Site in a manner that qualifies for state tax credits under the Abandoned Building Revitalization Act of 2013 (the "Act").

The Taxpayer intends to restore and convert the existing building on the Building Site into retail/commercial space for income producing purposes. The taxpayer does not plan to construct any new buildings or demolish any existing buildings, but it will perform site work on land surrounding the structure and related to its income producing use.

The following specific information regarding the rehabilitation is provided pursuant to S.C. Code Section 12-67-120(7):

- **Statement of Intent:** The Taxpayer intends to rehabilitate the Building Site in a manner that qualifies for state income tax credits under the Act.
- **Location:** 1519 Sumter Street, Unit 1, Columbia, SC 29201. Unit 1 has the meaning attributed to it under the Sumter Taylor Horizontal Property Regime. This is a portion of Richland County TMS No. 09014-09-07.
- **New construction:** No new buildings will be constructed on the Building Site as part of the rehabilitation.
- **Acreage:** The Building Site is a portion of the property located at 1519 Sumter Street in Columbia, SC, bearing Richland County TMS No. 09014-09-07, which is approximately 0.196 acre, more or less, in size.

- **Square footage of Existing Buildings:** The existing building on the Building Site contains approximately 11,502 square feet.
- **Buildings to be Renovated:** The Taxpayer intends to renovate the existing building in the Building Site.
- **Estimated Rehabilitation Expenses:** \$1,600,000.

The taxpayer elects to receive the income tax credit in the amount of 25% of actual rehabilitation expenses allowed under S.C. Code Section 12-67-140(A)(1).

Please do not hesitate to contact me if you have any questions or need any additional information.

Sincerely,

ROGERS LEWIS JACKSON MANN & QUINN, LLC



Christian L. Rogers