INTERNAL REVENUE SERVICE P. O. BOX 2508 CINCINNATI, OH 45201

Date.

APR 23 2015

ISLAND CITY DEVELOPMENT C/O VANESSA COOPER 701 ATLANTIC AVE ALAMEDA, CA 94501-2161

Employer Identification Number: 47-2164827 DLN: 17053085346035 Contact Person: JODI L GARUCCIO ID# 31481 Contact Telephone Number: (877) 829-5500 Accounting Period Ending: December 31 Public Charity Status: 509(a)(3) Form 990 Required: Effective Date of Exemption: August 29, 2014 Contribution Deductibility: Yes Addendum Applies: Νo

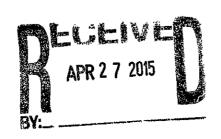
Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. We determined that you are a public charity under the Code section(s) listed in the heading of this letter.

Specifically, we have determined that you are a Type I supporting organization under section 509(a)(3). A Type I supporting organization is operated, supervised, or controlled by one or more publicly supported organizations.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.



ISLAND CITY DEVELOPMENT

Sincerely,

Director, Exempt Organizations

Island City Development Federal I.D. No. 47-2164827 Attachment to IRS Form 1023

- To the extent that the Limited Partnership Agreement requires that the Corporation obtain consent of the limited partners with respect to certain matters that do not involve day to day operations, including, but not limited to the following: (i) sale or refinancing of the Low-Income Housing Tax Credit Development; (ii) admission of a new partner; (iii) acquisition of additional property; (iv) transfer of the Corporation's interest in the Limited Partnership; (v) borrowing substantial additional funds; (vi) entering into contracts with affiliated entities; (vii) amendment of the Limited Partnership Agreement; (viii) change of accountant or property manager; and/or (ix) approval of annual budget, then such consent shall not be unreasonably withheld. Consent may be withheld if one or more of the above actions would likely be inconsistent with preserving the housing as a lowincome housing Development.
- To the extent that the Limited Partnership Agreement will give the limited partner the
 right to remove the Corporation as a general partner, that right will only be enforceable
 for cause as set forth in the Limited Partnership Agreement, and only after written notice
 of any proposed removal stating that cause for removal and granting a reasonable period
 of time to cure the enumerated deficiencies.

Moreover, the Corporation has adopted a conflict of interest policy that protects the Corporation's interest when the Corporation is contemplating entering into any transactions or arrangement that may result in an excess benefit transaction or might benefit the private interests of the Corporation's officers, directors, trustees, or partners.

Based on these representations and warranties required by the Choi Memo, the control of the Corporation by AHA and the operation and use requirements set forth in the ground lease (which will greatly exceed the Safe Harbor Guidelines) the Corporation's operation of the Developments will fulfill its charitable purpose and assist the City and AHA in providing affordable housing.

ISLAND CITY DEVELOPMENT, a California nonprofit public benefit corporation,

By:

Vanessa Cooper, President