



Unified Government of Wyandotte County
and Kansas City, Kansas

Adopted: 1/19/12

Tax-Exempt Financing Compliance Policy

I. Authority:

The Mayor and the Board of Commissioners are responsible for legislation, policy formulation, and overall direction setting of the government. This includes the approval of financial policies which establish and direct the operations of Unified Government (UG). The County Administrator is responsible for carrying out the policy directives of the UG Board of Commissioners and managing the day-to-day operations of the executive departments, including the Finance Department. This policy shall be administered on behalf of the County Administrator by the Chief Financial Officer and the Debt Coordinator.

II. Purpose:

Section 2.1 - The Issuer uses Governmental Tax-Exempt Bonds to fund Costs of Project Facilities and uses Conduit Tax-Exempt Bonds and loans or otherwise makes the proceeds available to Conduit Users to fund Costs of Project Facilities. The Issuer understands that in exchange for the right to issue Tax-Exempt Bonds at favorable interest rates and terms, the Code and related regulations impose ongoing requirements related to the proceeds of the Tax-Exempt Bonds and the Project Facility financed by the Tax-Exempt Bonds. These requirements focus on the investment, use and expenditure of proceeds of the Tax-Exempt Bonds and related funds as well as restrictions on the use of the Project Facility.

The Issuer recognizes that the IRS has stated that all issuers of Tax-Exempt Bonds should have a separate written policy and procedure regarding ongoing compliance with the federal tax requirements for Tax-Exempt Bonds.

The Issuer is committed to full compliance with the tax-exempt bond requirements for all of its outstanding and future tax-exempt financings. This Compliance Procedure is adopted by the Governing Body to comply with the IRS directive and to improve tax compliance and documentation. Since the Conduit User for each Conduit Tax-Exempt Bond issue is primarily responsible for the expenditure and investment of its Conduit Tax-Exempt Bonds and the use of the Financed Assets and the Project Facility, this Compliance Policy provides that the Conduit User will assume substantially all obligations related to post-issuance tax compliance for Conduit Tax-Exempt Bonds issued for its benefit.

III. Applicability and Scope:

Section 2.2 - This Compliance Procedure applies to all Tax-Exempt Bonds currently outstanding and all Tax-Exempt Bonds issued in the future. If the provisions of this Compliance Procedure conflict with a Tax Compliance Agreement or any other specific written instructions of Bond Counsel, the terms of the Tax Compliance Agreement or specific written instructions of Bond Counsel will supersede and govern in lieu of this

Compliance Procedure. Any exception to this Compliance Procedure required by Bond Counsel as part of a future issue of Tax-Exempt Bonds will be incorporated in the Tax Compliance Agreement for the future issue. Any requirements imposed on the Issuer in the Tax Compliance Agreement, will be noted by the Bond Compliance Officer and incorporated into the Annual Compliance Checklist.

Section 2.3 - This Compliance Procedure may be amended from time-to-time by the Governing Body. Copies of this Compliance Procedure and any amendments will be included in the permanent records of the Issuer.

IV. Policy:

BOND COMPLIANCE OFFICER; TRAINING

Section 3.1 Bond Compliance Officer Duties.

The Bond Compliance Officer is responsible for implementing this Compliance Procedure. The Bond Compliance Officer will work with other employees that use the Project Facility to assist in implementing this Compliance Procedure. The Bond Compliance Officer will consult with Bond Counsel, legal counsel to the Issuer, accountants, tax return preparers and other outside experts to the extent necessary to carry out the purposes of this Compliance Procedure. The Bond Compliance Officer will report to the Governing Body as necessary, and at least annually, regarding implementation of this Compliance Procedure and any recommended changes or amendments to this Compliance Procedure.

Section 3.2 Training.

When appropriate, the Bond Compliance Officer or his or her designee will attend training programs offered by the IRS or other industry professionals regarding tax-exempt financing that are relevant to the Issuer.

GOVERNMENTAL TAX-EXEMPT BONDS CURRENTLY OUTSTANDING

Section 4.1 Governmental Tax-Exempt Bonds Covered by Article IV Procedures.

This Article IV applies to all Governmental Tax-Exempt Bonds issued prior to January 19, 2012 that are currently outstanding as of January 19, 2012. These Governmental Tax-Exempt Bonds are listed on Exhibit A-1.

Section 4.2 Governmental Tax-Exempt Bond File.

As soon as practical, the Bond Compliance Officer will attempt to assemble as much of the Governmental Tax-Exempt Bond File as is available for each Governmental Tax-Exempt Bond that is listed on Exhibit A-1.

Section 4.3 Annual Compliance Checklists.

As soon as practical following the adoption of this Compliance Procedure, the Bond Compliance Officer will work with Bond Counsel and/or legal counsel to the Issuer and cause Annual Compliance Checklists (an example of which is attached as Exhibit B) to be completed for all outstanding Governmental Tax-Exempt Bonds and will follow the procedures specified in Article VI to complete the Annual Compliance Checklists and thereafter include each completed Annual Compliance Checklist in the Governmental Tax-Exempt Bond File.

Section 4.4 Correcting Prior Deficiencies in Compliance.

In the event the Bond Compliance Officer determines any deficiency in compliance with a Tax Compliance Agreement for an outstanding Governmental Tax-Exempt Bond listed on Exhibit A-1, the Bond Compliance Officer will follow the procedures described in Treasury Regulations or the Tax-Exempt Bonds Voluntary Closing Agreement Program (VCAP) to remediate the noncompliance. If remediation of the noncompliance requires the Issuer to submit a request under VCAP, the Bond Compliance Officer will undertake this step only after reporting the violation to the Governing Body and obtaining its approval.

CONDUIT TAX-EXEMPT BONDS CURRENTLY OUTSTANDING

Section 5.1 Conduit Tax-Exempt Bonds Covered by Article V Procedures.

This Article V applies to all Conduit Tax-Exempt Bonds issued prior to January 1, 2012 that are currently outstanding as of January 1, 2012. These Conduit Tax-Exempt Bonds are listed on Exhibit A-2.

Section 5.2 Conduit Tax-Exempt Bond File.

As soon as practical, the Bond Compliance Officer will attempt to assemble as much of the Conduit Tax-Exempt Bond File as is available for each Conduit Tax-Exempt Bond that is listed on Exhibit A-2.

Section 5.3 Conduit User Contact.

As soon as practical the Bond Compliance Officer will send to each Conduit User of a Conduit Tax-Exempt Bond listed on Exhibit A-2, a copy of the Tax Compliance Agreement for the financing along with a letter reminding the Conduit User that under the agreement it is responsible for post-issuance tax compliance related to the investment of Bond Restricted Funds, record keeping, use of Conduit Tax-Exempt Bond proceeds, and use of the Project Facility. The letter will contain a list of records comprising the Conduit Tax-Exempt Bond File that the Conduit User should retain.

Section 5.4 Annual Certification.

As soon as practical following the adoption of this Compliance Procedure, the Bond Compliance Officer will request each Conduit User to confirm annually in writing its compliance with the terms of the Tax Compliance Agreement for the Conduit Tax-Exempt Bond issue. Where possible, the Bond Compliance Officer will combine this certification request with other disclosures the Conduit User regularly provides to the Trustee (such as ongoing continuing disclosure). Certifications completed by the Conduit User will be retained by the Bond Compliance Officer.

Section 5.5 Correcting Prior Deficiencies in Compliance.

In the event a Conduit User informs the Bond Compliance Officer of a deficiency in compliance with a Tax Compliance Agreement for an outstanding Conduit Tax-Exempt Bond listed on Exhibit A-2, the Bond Compliance Officer will direct the Conduit User to follow the procedures described in Treasury Regulations or the Tax-Exempt Bonds Voluntary Closing Agreement Program (VCAP) to remediate the noncompliance. If remediation of the noncompliance requires the Issuer to submit a request under VCAP, the Bond Compliance Officer will undertake this step only after reporting the violation to the Governing Body and obtaining its approval.

COMPLIANCE PROCEDURE FOR NEW GOVERNMENTAL TAX-EXEMPT BOND ISSUES

Section 6.1. Application.

This Article VI applies to Governmental Tax-Exempt Bond financings issued on or after February 23, 2012.

Section 6.2. Prior to Issuance of Governmental Tax-Exempt Bonds.

- a. Intent Resolution. The Governing Body will authorize and approve the issuance of Governmental Tax-Exempt Bonds. Prior to or as a part of this authorizing resolution or ordinance, the Governing Body may adopt an Intent Resolution.
- b. Directions to Bond Counsel. The Bond Compliance Officer will provide a copy of this Compliance Procedure to Bond Counsel with directions for Bond Counsel to structure the documentation and procedural steps taken prior to issuing the Governmental Tax-Exempt Bonds so that they conform to the requirements of this Compliance Procedure, except to the extent Bond Counsel determines that different procedures are required. The Bond Compliance Officer will consult with Bond Counsel so that appropriate provisions are made to fund or reimburse the Issuer's costs and expenses incurred to implement this Compliance Procedure.
- c. Tax Compliance Agreement. Each Governmental Tax-Exempt Bond issue will include a Tax Compliance Agreement signed by the Bond Compliance Officer. The Tax Compliance Agreement will:
 - (1) describe the Project Facility and the anticipated Financed Assets,
 - (2) identify all Bond Restricted Funds and provide for arbitrage and rebate compliance,
 - (3) for new money financings – require a Final Written Allocation, and
 - (4) contain a form of the Annual Compliance Checklist for the Governmental Tax-Exempt Bond issue.

The Bond Compliance Officer will confer with Bond Counsel and the Issuer's counsel regarding the meaning and scope of each representation and covenant contained in the Tax Compliance Agreement.

- c. Preliminary Cost Allocations. The Bond Compliance Officer in consultation with Bond Counsel will prepare a preliminary cost allocation plan for the Project Facility. The preliminary cost allocation plan will identify the assets and expected costs for the Project Facility, and, when necessary, will break-out the portions of Costs that the Issuer expects to finance with Governmental Tax-Exempt Bonds (the "Financed Assets") from the portions expected to be financed from other sources.
- d. Tax Review with Bond Counsel. Prior to the sale of the Governmental Tax-Exempt Bonds, the Bond Compliance Officer and Bond Counsel will review this Compliance Procedure together with the draft Tax Compliance Agreement to ensure that any tax compliance issues in the new financing are adequately addressed by this Compliance Procedure and/or the Tax Compliance Agreement. In the event Bond Counsel determines that this Compliance Procedure conflicts with or must be supplemented to account for special issues or requirements for the Governmental Tax-Exempt Bonds, the Bond Compliance Officer will ask Bond Counsel to include the written modifications or additions in the final Tax Compliance Agreement. The Bond Compliance Officer will

request Bond Counsel to prepare a form of Annual Compliance Checklist for use in monitoring the ongoing compliance requirements for the Governmental Tax-Exempt Bond issue.

Section 6.3 Accounting and Recordkeeping.

- a. Accounting for New Money Projects. The Bond Compliance Officer will be responsible for accounting for the investment and allocation of proceeds of the Governmental Tax-Exempt Bonds. The Bond Compliance Officer will establish separate accounts or subaccounts to record expenditures for Costs of the Project Facility. Where appropriate, the Bond Compliance Officer may use accounts established as part of the Issuer's financial records for this purpose. In recording Costs for the Project Facility, the Bond Compliance Officer will insure that the accounting system will include the following information:
 - (1) identity of person or business paid, along with any other available narrative description of the purpose for the payment,
 - (2) date of payment,
 - (3) amount paid, and
 - (4) invoice number or other identifying reference.
- b. Accounting for Refunded Bonds and Related Refunded Bond Accounts. For Governmental Tax-Exempt Bonds that refund prior issues, the Tax Compliance Agreement will set out special accounting and allocation procedures for the proceeds of the financing, and if necessary proceeds of the refinanced debt.
- c. Tax-Exempt Bond File. The Bond Compliance Officer will be responsible for assembling and maintaining the Governmental Tax-Exempt Bond File.

Section 6.4 Final Allocation of Bond Proceeds.

- a. Bond Compliance Officer Responsible for Preparation of Final Written Allocation; Timing. The Bond Compliance Officer is responsible for making a written allocation of proceeds to expenditures and the identification of Financed Assets. This process will be memorialized in the Final Written Allocation.

For a new money financing, the Bond Compliance Officer will commence this process as of the earliest of:

- (1) the requisition of all Governmental Tax-Exempt Bond proceeds from any segregated Tax-Exempt Bond funded account,
- (2) the date the Project Facility has been substantially completed or
- (3) four and one-half years following the issue date of the Governmental Tax-Exempt Bonds.

For Governmental Tax-Exempt Bonds issued only to refund a prior issue of Governmental Tax-Exempt Bonds, the Bond Compliance Officer will prepare and/or document the Final Written Allocation for the Project Facility financed by the refunded Governmental Tax-Exempt Bonds in accordance with the advice of Bond Counsel and include it in the Tax Compliance Agreement.

- b. Contents and Procedure. The Bond Compliance Officer will consult the Tax Compliance Agreement and, if necessary, contact Bond Counsel to seek advice regarding any special allocation of Governmental Tax-Exempt Bond proceeds and other money of the Issuer to the Costs of the Project Facility. If no special allocation is required or recommended, the Bond Compliance Officer will allocate Costs of the Project Facility to the proceeds of the Governmental Tax-Exempt Bonds in accordance with the Issuer's accounting records.

Each Final Written Allocation will contain the following:

- (1) a reconciliation of the actual sources and uses to Costs of the Project Facility,
 - (2) the percentage of the cost of the Project Facility financed with proceeds of the Governmental Tax-Exempt Bonds (sale proceeds plus any investment earnings on those sale proceeds),
 - (3) the Project Facility's Placed in Service date,
 - (4) the estimated economic useful life of the Project Facility, and
 - (5) any special procedures to be followed in completing the Annual Compliance Checklist (e.g., limiting the Annual Compliance Checklist to specific areas of the Project Facility that the Final Written Allocation or the Tax Compliance Agreement treats as having been financed by Governmental Tax-Exempt Bonds).
- c. Finalize Annual Compliance Checklist. As part of the preparation of the Final Written Allocation, the Bond Compliance Officer will update the draft Annual Compliance Checklist contained in the Tax Compliance Agreement. The Bond Compliance Officer will include reminders for all subsequent arbitrage rebate computations required for the Governmental Tax-Exempt Bonds in the Annual Compliance Checklist.
 - d. Review of Final Written Allocation and Annual Compliance Checklist. Each Final Written Allocation and Annual Compliance Checklist will be reviewed by legal counsel to the Issuer or Bond Counsel for sufficiency and compliance with the Tax Compliance Agreement and this Compliance Procedure. Following the completion of the review, the Bond Compliance Officer will execute the Final Written Allocation.

COMPLIANCE PROCEDURE FOR NEW CONDUIT TAX-EXEMPT BOND ISSUES

Section 7.1 Application.

This Article VII applies to Conduit Tax-Exempt Bond financings issued on or after January 1, 2012.

Section 7.2 Prior to Issuance of Conduit Tax-Exempt Bonds.

- a. Intent Resolution. The Governing Body will authorize and approve the issuance of Conduit Tax-Exempt Bonds. Prior to or as a part of this authorizing resolution or ordinance, the Governing Body may adopt an Intent Resolution. The Bond Compliance Officer will provide the Conduit User with a copy of this Compliance Procedure prior to adoption of the Intent Resolution.
- b. Directions to Bond Counsel. The Bond Compliance Officer will provide a copy of this Compliance Procedure to Bond Counsel with directions for Bond Counsel to structure the documentation and procedural steps taken prior to issuing the Conduit Tax-Exempt Bonds so that they conform to the requirements of this Compliance Procedure, except

to the extent Bond Counsel determines that different procedures are required. The Bond Compliance Officer will consult with Bond Counsel so that appropriate provisions are made to fund or reimburse the Issuer's costs and expenses incurred to implement this Compliance Procedure. To the extent the Issuer relies on or acts at the direction of the Conduit User, the Tax Compliance Agreement will contain appropriate provision for Issuer indemnification by the Conduit User.

- c. Tax Compliance Agreement. Each Conduit Tax-Exempt Bond issue will include a Tax Compliance Agreement signed by the Conduit User Bond Compliance Officer. The Tax Compliance Agreement will:
 - (1) describe the Project Facility and the anticipated Financed Assets,
 - (2) identify all Bond Restricted Funds and provide for arbitrage and rebate compliance by the Conduit User,
 - (3) for new money financings – require the Conduit User to complete a Final Written Allocation, and
 - (4) contain a form of the Annual Compliance Checklist for the Conduit Tax-Exempt Bond issue.

The Conduit User Bond Compliance Officer will confer with Bond Counsel, the Bond Compliance Officer and the Issuer's counsel regarding the meaning and scope of each representation and covenant contained in the Tax Compliance Agreement.

- c. Preliminary Cost Allocations. The Conduit User Bond Compliance Officer in consultation with Bond Counsel will prepare a preliminary cost allocation plan for the Project Facility. The preliminary cost allocation plan will identify the assets and expected costs for the Project Facility, and, when necessary, will break-out the portions of Costs that the Issuer expects to finance with Conduit Tax-Exempt Bonds (the "Financed Assets") from the portions expected to be financed from other sources.
- d. Tax Review with Bond Counsel. Prior to the sale of the Tax-Exempt Bonds, the Bond Compliance Officer, Conduit User Bond Compliance Officer and Bond Counsel will review this Compliance Procedure together with the draft Tax Compliance Agreement to ensure that any tax compliance issues in the new financing are adequately addressed by this Compliance Procedure and/or the Tax Compliance Agreement. In the event Bond Counsel determines that this Compliance Procedure conflicts with or must be supplemented to account for special issues or requirements for the Conduit Tax-Exempt Bonds, the Bond Compliance Officer will ask Bond Counsel to include the written modifications or additions in the final Tax Compliance Agreement. The Bond Compliance Officer will request Bond Counsel to prepare a form of Annual Compliance Checklist for use in monitoring the ongoing compliance requirements for the Conduit Tax-Exempt Bond issue.

Section 7.3 Accounting and Recordkeeping.

- a. Accounting for New Money Projects. The Conduit User Bond Compliance Officer will be responsible for accounting for the investment and allocation of proceeds of the Conduit Tax-Exempt Bonds. The Conduit User Bond Compliance Officer will establish separate accounts or subaccounts to record expenditures for Costs of the Project Facility. The Conduit User Bond Compliance Officer may use accounts established pursuant to a

trust indenture for the Conduit Tax-Exempt Bonds to assist it in accounting for the investment and expenditure of Conduit Tax-Exempt Bonds.

In recording Costs for the Project Facility, the Conduit User Bond Compliance Officer will insure that the accounting system will include the following information: (1) identity of person or business paid, along with any other available narrative description of the purpose for the payment, (2) date of payment, (3) amount paid, and (4) invoice number or other identifying reference.

- b. Accounting for Refunded Bonds and Related Refunded Bond Accounts. For Conduit Tax-Exempt Bonds that refund prior issues, the Tax Compliance Agreement will set out special accounting and allocation procedures for the proceeds of the financing, and if necessary proceeds of the refinanced debt.
- c. Conduit Tax-Exempt Bond File. The Conduit User Bond Compliance Officer will be responsible for assembling and maintaining the Conduit Tax-Exempt Bond File. The Conduit User Bond Compliance Officer will provide copies to the Issuer of items contained in the Conduit Tax-Exempt Bond File.

Section 7.4 Final Allocation of Bond Proceeds.

- a. Bond Compliance Officer Responsible for Preparation of Final Written Allocation; Timing. The Conduit User Bond Compliance Officer is responsible for making a written allocation of proceeds to expenditures and the identification of Financed Assets. This process will be memorialized in the Final Written Allocation.

For a new money financing, the Conduit User Bond Compliance Officer will commence this process as of the earliest of:

- (1) the requisition of all Conduit Tax-Exempt Bond proceeds from any segregated Conduit Tax-Exempt Bond funded account,
- (2) the date the Project Facility has been substantially completed or
- (3) four and one-half years following the issue date of the Conduit Tax-Exempt Bonds.

For Conduit Tax-Exempt Bonds issued only to refund a prior issue of Conduit Tax-Exempt Bonds, the Conduit User Bond Compliance Officer will prepare and/or document the Final Written Allocation for the Project Facility financed by the refunded Conduit Tax-Exempt Bonds in accordance with the advice of Bond Counsel and include it in the Tax Compliance Agreement.

- b. Contents and Procedure. The Conduit User Bond Compliance Officer will consult the Tax Compliance Agreement and, if necessary, contact Bond Counsel to seek advice regarding any special allocation of Conduit Tax-Exempt Bond proceeds and other money of the Issuer to the Costs of the Project Facility. If no special allocation is required or recommended, the Bond Compliance Officer will allocate Costs of the Project Facility to the proceeds of the Conduit Tax-Exempt Bonds in accordance with the Conduit User's accounting records.

Each Final Written Allocation will contain the following:

- (1) a reconciliation of the actual sources and uses to Costs of the Project Facility,

- (2) the percentage of the cost of the Project Facility financed with proceeds of the Conduit Tax-Exempt Bonds (sale proceeds plus any investment earnings on those sale proceeds),
 - (3) the Project Facility's Placed in Service date,
 - (4) the estimated economic useful life of the Project Facility, and
 - (5) any special procedures to be followed in completing the Annual Compliance Checklist (e.g., limiting the Annual Compliance Checklist to specific areas of the Project Facility that the Final Written Allocation or the Tax Compliance Agreement treats as having been financed by Conduit Tax-Exempt Bonds).
- c. Finalize Annual Compliance Checklist. As part of the preparation of the Final Written Allocation, the Conduit User Bond Compliance Officer will update the draft Annual Compliance Checklist contained in the Tax Compliance Agreement. The Conduit User Bond Compliance Officer will include reminders for all subsequent arbitrage rebate computations required for the Conduit Tax-Exempt Bonds in the Annual Compliance Checklist.
 - d. Review of Final Written Allocation and Annual Compliance Checklist. Each Final Written Allocation and Annual Compliance Checklist will be reviewed by legal counsel to the Conduit User or Bond Counsel for sufficiency and compliance with the Tax Compliance Agreement and this Compliance Procedure. Following the completion of the review, the Bond Compliance Officer will execute the Final Written Allocation.
 - e. Conduit User Certification of Compliance. The Conduit User Bond Compliance Officer will certify in writing to the Trustee completion of its responsibilities under this Section 7.4.

ONGOING MONITORING PROCEDURES – GOVERNMENTAL TAX-EXEMPT BONDS

Section 8.1 Annual Compliance Check-list.

An Annual Compliance Checklist will be completed by the Bond Compliance Officer each year following completion of the Final Written Allocation. Each Annual Compliance Checklist will be designed and completed for the purpose of identifying potential noncompliance with the terms of the Tax Compliance Agreement or this Compliance Procedure and obtaining documents (such as investment records, arbitrage calculations, or other documentation for the Project Facility) that are required to be incorporated in the Governmental Tax-Exempt Bond File. The Bond Compliance Officer will refer any responses indicating a violation of the terms of the Tax Compliance Agreement to legal counsel to the Issuer or Bond Counsel and, if recommended by counsel, will follow the procedure set out in Section 4.4 to remediate the non-compliance.

Section 8.2 Arbitrage and Rebate Compliance.

The Bond Compliance Officer will monitor the investment of Bond Restricted Funds and provide investment records to the Rebate Analyst on a timely basis. The Bond Compliance Officer will follow the directions of the Rebate Analyst with respect to the preparation of and the timing of rebate or yield reduction computations.

Section 9.1 Annual Compliance Checklist.

An Annual Compliance Checklist will be completed by the Conduit User Bond Compliance Officer each year following completion of the Final Written Allocation. Each Annual Compliance Checklist will be designed and completed for the purpose of identifying potential noncompliance with the terms of the Tax Compliance Agreement or this Compliance Procedure and obtaining documents (such as investment records, arbitrage calculations, or other documentation for the Project Facility) that are required to be incorporated in the Conduit Tax-Exempt Bond File. The Conduit User Bond Compliance Officer will refer any responses indicating a violation of the terms of the Tax Compliance Agreement to legal counsel to the Conduit User or Bond Counsel and, if recommended by counsel, will follow the procedure set out in Section 5.4 to remediate the non-compliance.

Section 9.2 Arbitrage and Rebate Compliance.

The Conduit User Bond Compliance Officer will monitor the investment of Bond Restricted Funds and provide investment records to the Rebate Analyst on a timely basis. The Bond Compliance Officer will follow the directions of the Rebate Analyst with respect to the preparation of and the timing of rebate or yield reduction computations.

V. Quality Control and Quality Assurance:

It is the responsibility of the Chief Financial Officer to ensure the presence of procedures that provide sufficient guidance to affected Unified Government personnel to fulfill the intent of this policy.

These policies will be reviewed at least annually and updated on an as-needed basis.

VI. Metrics:

To be developed and managed accordingly.

VII. Definitions and Acronyms:

- A. **Annual Compliance Checklist** - means (a) for Governmental Tax-Exempt Bonds, a questionnaire and/or checklist described in Section 8.1 that is completed each year for a Governmental Tax-Exempt Bond issue and (b) for Conduit Tax-Exempt Bonds, a questionnaire and/or checklist described in Section 9.1 that is completed each year for a Conduit Tax-Exempt Bond issue.
- B. **Board of Public Utilities** - means the Board of Public Utilities, an administrative agency of the Issuer.
- C. **Bond Compliance Officer** - means, with respect to the Issuer's Utility System Revenue Bonds, the Manager of Accounting and Finance/CFO of the Board of Public Utilities, and with respect to all other Governmental Tax-Exempt Bonds, the Issuer's Chief Financial Officer or, if the position of Chief Financial Officer is vacant, the person filling the responsibilities of the Chief Financial Officer for the Governing Body.
- D. **Bond Counsel** - means a law firm selected by the Issuer to provide a legal opinion regarding the tax status of interest on Tax-Exempt Bonds as of the issue date or the law firm selected to advise regarding matters referenced in this Compliance Procedure.
- E. **Bond Restricted Funds** - means the funds, accounts, and investments that are subject to arbitrage rebate and/or yield restriction rules that have been identified in the Tax Compliance Agreement for a Tax-Exempt Bond issue.

- F. **Bond Transcript** - means the “transcript of proceedings” or other similar titled set of documents assembled by Bond Counsel following the issuance of Tax-Exempt Bonds.
- G. **Code** - means the Internal Revenue Code, as amended.
- H. **Compliance Procedure** - means this Tax-Exempt Financing Compliance Policy and Procedure.
- I. **Conduit Tax-Exempt Bond** - means any bond, note, installment sale agreement, lease or certificate intended to be a debt obligation of the Issuer, the proceeds of the which are to be loaned or otherwise made available to the Conduit User, and the interest on which is excludable from gross income for federal income tax purposes. A list of all Conduit Tax-Exempt Bonds outstanding and subject to this Compliance Procedure as of June 30, 2017, is attached as **Exhibit A-2**.
- J. **Conduit Tax-Exempt Bond File** - means documents and records which may consist of paper and electronic medium, maintained for each Conduit Tax-Exempt Bond. Each Conduit Tax-Exempt Bond File will include the following information if applicable:
- a. Intent Resolution. (Duplicate Copy Maintained by Bond Compliance Officer)
 - b. Bond Transcript. (Duplicate Copy Maintained by Bond Compliance Officer)
 - c. Final Written Allocation and/or all available accounting records related to the Project Facility showing expenditures allocated to the proceeds of a Conduit Tax-Exempt Bond and expenditures (if any) allocated to other sources of funds.
 - d. All rebate and yield reduction payment calculations performed by the Rebate Analyst and all investment records provided to the Rebate Analyst for purposes of preparing the calculation.
 - e. Forms 8038-T together with proof of filing and payment of rebate. (Duplicate Copy Maintained by Bond Compliance Officer)
 - f. Investment agreement bid documents (unless included in the Bond Transcript) including:
 - Bid solicitation, bid responses, certificate of broker;
 - Written summary of reasons for deviations from the terms of the solicitation that are incorporated into the investment agreement; and
 - Copies of the investment agreement and any amendments.
 - g. Any item required to be maintained by the terms of the Tax Compliance Agreement involving the use of the Project Facility or expenditures related to tax compliance for the Conduit Tax-Exempt Bonds.
 - h. Any opinion of Bond Counsel regarding the Conduit Tax-Exempt Bonds not included in the Bond Transcript. (Duplicate Copy Maintained by Bond Compliance Office.
 - i. Amendments, modifications or substitute agreements to any agreement contained in the Bond Transcript. (Duplicate Copy Maintained by Bond Compliance Officer)
 - j. Any correspondence with the IRS relating to the Conduit Tax-Exempt Bonds including all correspondence relating to an audit by the IRS of the Conduit Tax-Exempt Bonds or any proceedings under the Tax-Exempt Bonds Voluntary Closing Agreement Program (VCAP). (Duplicate Copy Maintained by Bond Compliance Officer)
 - k. Any available questionnaires or correspondence substantiating the use of the Project Facility in accordance with the terms of the Tax Compliance Agreement for the Conduit Tax-Exempt Bond issue.

- I. For refunding bond issues, the Conduit Tax-Exempt Bond File for the refunded Conduit Tax-Exempt Bonds.
- K. **Conduit User** - means the entity that receives proceeds and is required to pay principal and interest on a Conduit Tax-Exempt Bond issue.
- L. **Conduit User Bond Compliance Officer** means the individual officer or employee of the Conduit User named as the primary individual responsible for post-issuance tax compliance by the Conduit User in connection with a Conduit Tax-Exempt Bond issue.
- M. **Cost** or **"Costs"** - means all costs and expenses paid for the acquisition, design, construction, equipping or improvement of a Project Facility or costs of issuing Tax-Exempt Bonds.
- N. **Final Written Allocation** - means the Final Written Allocation of Bond proceeds prepared pursuant to Section 6.4 of this Compliance Procedure for Governmental Tax-Exempt Bonds and pursuant to Section 7.4 of this Compliance Procedure for Conduit Tax-Exempt Bonds.
- O. **Financed Assets** - means that part of a Project Facility treated as financed with Tax-Exempt Bond proceeds as reflected in a Final Written Allocation or, if no Final Written Allocation was prepared, (a) the accounting records of the Issuer and the Tax Compliance Agreement for the Governmental Tax-Exempt Bond issue or (b) the accounting records of the Trustee and the Conduit Issuer and the Tax Compliance Agreement for the Conduit Tax-Exempt Bond issue.
- P. **Governing Body** - means the Commission of the Issuer.
- Q. **Governmental Tax-Exempt Bond(s)** - means any bond, note, installment sale agreement, lease or certificate intended to be a debt obligation of the Issuer or another political subdivision or government instrumentality, the proceeds of the which are to be loaned or otherwise made available to the Issuer, and the interest on which is excludable from gross income for federal income tax purposes. A list of all Governmental Tax-Exempt Bonds outstanding and subject to this Compliance Procedure as of January 19, 2012, is attached as **Exhibit A-1**.
- R. **Governmental Tax-Exempt Bond File** - means documents and records which may consist of paper and electronic medium, maintained for each Governmental Tax-Exempt Bond. Each Governmental Tax-Exempt Bond File will include the following information if applicable:
- a. Intent Resolution.
 - b. Bond Transcript.
 - c. Final Written Allocation and/or all available accounting records related to the Project Facility showing expenditures allocated to the proceeds of a Governmental Tax-Exempt Bond and expenditures (if any) allocated to other sources of funds.
 - d. All rebate and yield reduction payment calculations performed by the Rebate Analyst and all investment records provided to the Rebate Analyst for purposes of preparing the calculation.
 - e. Forms 8038-T together with proof of filing and payment of rebate.
 - f. Investment agreement bid documents (unless included in the Bond Transcript) including:
 - Bid solicitation, bid responses, certificate of broker;
 - Written summary of reasons for deviations from the terms of the solicitation that are incorporated into the investment agreement; and
 - Copies of the investment agreement and any amendments.

- g. Any item required to be maintained by the terms of the Tax Compliance Agreement involving the use of the Project Facility or expenditures related to tax compliance for the Governmental Tax-Exempt Bonds.
 - h. Any opinion of Bond Counsel regarding the Governmental Tax-Exempt Bonds not included in the Bond Transcript.
 - i. Amendments, modifications or substitute agreements to any agreement contained in the Bond Transcript.
 - j. Any correspondence with the IRS relating to the Governmental Tax-Exempt Bonds including all correspondence relating to an audit by the IRS of the Governmental Tax-Exempt Bonds or any proceedings under the Tax-Exempt Bonds Voluntary Closing Agreement Program (VCAP).
 - k. Any available questionnaires or correspondence substantiating the use of the Project Facility in accordance with the terms of the Tax Compliance Agreement for the Governmental Tax-Exempt Bond issue.
 - l. For refunding bond issues, the Governmental Tax-Exempt Bond File for the refunded Governmental Tax-Exempt Bonds.
- S. **Intent Resolution** means a resolution of the Governing Body stating the intent of the Issuer to finance all or a portion of the Project Facility, stating the expected maximum size of the financing and stating the intent of the Issuer to reimburse (a) the costs paid by the Issuer from proceeds of the Governmental Tax-Exempt Bonds or (b) the costs paid by the Conduit User from proceeds of the Conduit Tax-Exempt Bonds.
- T. **IRS** - means the Internal Revenue Service.
- U. **Issuer** - means the Unified Government of Wyandotte County/Kansas City, Kansas.
- V. **Placed In Service** - means that date (as determined by the Conduit User Bond Compliance Officer for Conduit Tax-Exempt Bonds and as determined by the Bond Compliance Officer for Governmental Tax-Exempt Bonds) when the Project Facility is complete and is actually used at a level substantially as originally designed.
- W. **Project Facility** - means all tangible or intangible property financed in whole or in part with Tax-Exempt Bonds that is functionally related or integrated in use, that is located on the same physical site or proximate sites, and that is expected to be Placed In Service within a one-year period.
- X. **Rebate Analyst** - means the Rebate Analyst for the Tax-Exempt Bonds selected pursuant to the Tax Compliance Agreement.
- Y. **Tax Compliance Agreement** - means, (a) with respect to Governmental Tax-Exempt Bonds, the Federal Tax Certificate, Tax Compliance Agreement, Arbitrage Agreement, or other written certification or agreement of the Issuer setting out representations and covenants for satisfying the post-issuance tax compliance requirements for a Governmental Tax-Exempt Bond issue and (b) with respect to Conduit Tax-Exempt Bonds, the Federal Tax Certificate, Tax Compliance Agreement, Arbitrage Agreement, or other written certification or agreement of the Issuer and the Conduit User setting out representations and covenants for satisfying the post-issuance tax compliance requirements for a for a Conduit Tax-Exempt Bond issue.
- Z. **Tax-Exempt Bond(s)** - means Governmental Tax-Exempt Bonds and Conduit Tax-Exempt Bonds.
- AA. **Trustee** - means the corporate trustee named in a trust indenture for a Conduit Tax-Exempt Bond issue.
- BB. **Utility System Revenue Bonds** - means any bond, note, installment sale agreement, lease or certificate intended to be a debt obligation of the Issuer or another political

subdivision or government instrumentality, the proceeds of the which are to be loaned or otherwise made available to the Board of Public Utilities, and the interest on which is excludable from gross income for federal income tax purposes. A list of all Utility System Revenue Bonds outstanding and subject to this Compliance Procedure as of January 19, 2012, are specifically identified on the list of Governmental Tax-Exempt Bonds attached as **Exhibit A-1**.

VIII. Related Documents and References:

- A. Debt Policy
- B. Securities and Continuing Disclosure Matters Compliance Procedure

IX. Exhibits:

- A-1. List of Governmental Tax-Exempt Bonds Covered by this Compliance Procedures
- A-2. List of Conduit Tax-Exempt Bonds Covered by this compliance Procedure
- B. Sample Annual Compliance checklist for Governmental Tax-Exempt Bonds

EXHIBIT A-1LIST OF GOVERNMENTAL TAX-EXEMPT BONDS COVERED BY THIS COMPLIANCE PROCEDURE
(Last updated June 30, 2018)

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
General Obligation Bonds – City			
10/30/08	6,415,000	General Obligation Improvement Bonds, Series 2008-C	08/01/28
03/31/09	22,335,000	General Obligation Improvement Bonds, Series 2009-A	08/01/29
02/26/10	50,875,000	General Obligation Improvement Bonds, Series 2010-A	08/01/30
02/26/10	7,770,000	Taxable General Obligation Improvement Bonds (Recovery Zone Economic Development Bonds – Direct Pay), Series 2010-C	08/01/30
02/26/10	19,415,000	Taxable General Obligation Improvement Bonds (Build America Bonds – Direct Pay), Series 2010-D	08/01/30
12/16/10	10,785,000	Taxable General Obligation Improvement Bonds (Recovery Zone Economic Development Bonds – Direct Pay), Series 2010-F	08/01/30
12/16/10	2,530,000	Taxable General Obligation Improvement Bonds (Qualified Energy Conservation Bonds – Direct Pay), Series 2010-G	08/01/27
02/24/11	18,500,000	General Obligation Improvement Bonds, Series 2011-A	08/01/31
09/15/11	12,770,000	General Obligation Refunding Bonds, Series 2011-D	08/01/22
02/23/12	15,200,000	General Obligation Improvement Bonds, Series 2012-A	08/01/32
02/27/13	15,225,000	General Obligation Refunding Bonds, Series 2013-A	08/01/33
05/30/13	9,950,000	General Obligation Refunding Bonds, Series 2013-C	08/01/23
02/27/14	16,480,000	General Obligation Improvement Bonds, Series 2014-A	08/01/34
02/26/15	29,655,000	General Obligation Refunding Bonds, Series 2015-A	08/01/35
02/26/15	20,615,000	General Obligation Refunding Bonds, Series 2015-D	08/01/25
02/25/16	26,825,000	General Obligation Improvement Bonds, Series 2016-A	08/01/36
03/17/16	19,675,000	General Obligation Refunding Bonds, Series 2016-B	08/01/28
02/23/17	21,995,000	General Obligation Improvement Bonds, Series 2017-A	08/01/37

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
02/23/17	12,990,000	General Obligation Refunding Bonds, Series 2017-C	08/01/29
12/28/17	37,130,000	General Obligation Refunding Bonds, Series 2017-D	08/01/30
02/27/18	34,025,000	General Obligation Improvement Bonds, Series 2018-A	08/01/38

General Obligation Bonds – County

02/27/14	10,015,000	General Obligation Improvement Bonds, Series 2014-C	08/01/29
02/26/15	5,070,000	General Obligation Improvement Bonds, Series 2015-C	08/01/29
02/27/18	1,450,000	General Obligation Improvement Bonds, Series 2018-B	08/01/28

Municipal Temporary Notes – City

02/27/18	65,020,000	Municipal Temporary Notes, Series 2018-I	03/01/19
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Annual Appropriation Bonds

12/28/10	7,725,000	Special Obligation Annual Appropriation Bonds (Recovery Zone Facility Bonds – Parking Projects), Series 2010-H	12/01/31
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<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
Capital Leases			
12/10/10	395,688	2010 Schedule 2	12/10/20
06/24/11	578,956	CMIP 8675	12/24/25
12/15/11	338,708	2011 Schedule 2	12/15/16
12/15/11	851,560	2011 Schedule 3	12/15/18
12/15/11	1,457,367	2011 Schedule 4	12/15/21
12/14/12	319,648	2012 Lease Package Schedule 3	12/14/19
12/20/13	975,000	2013 Lease Package Schedule 2	12/20/23
12/20/13	537,838	2013 Lease Package Schedule 3	12/20/18
12/20/13	424,581	2013 Lease Package Schedule 4	12/20/20
12/18/14	950,715	2014 Lease Package Schedule 6	12/18/19
12/18/14	426,223	2014 Lease Package Schedule 7	12/18/21
02/04/15	576,259	Fire Department Defibrillators	02/01/19
02/27/15	303,991	Technology HP Lease	04/27/19
12/10/15	1,063,361	2015 Lease Package Schedule 8	12/10/18
12/10/15	677,484	2015 Lease Package Schedule 9	12/10/20
12/10/16	1,520,450	2016 Lease Package Schedule 10	12/10/19
12/10/16	1,978,428	2016 Lease Package Schedule 11	09/10/26
12/21/17	1,187,119	2017 Lease Package Schedule 12	12/21/20
12/21/17	679,709	2017 Lease Package Schedule 13	12/21/22
12/21/17	415,796	2017 Lease Package Schedule 14	12/21/27

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
Leases with the Public Building Commission			
03/01/13	9,915,000	Emergency Communication, Series 2013-A	08/01/28
02/25/16	6,775,000	BPU Office Building, Series 2016-A	11/01/20
03/15/18	24,430,000	Juvenile Justice Facility, Series 2018-A	08/01/38
03/15/18	8,710,000	Courthouse & Adult Jail Facility, Series 2018-B	08/01/38
Transportation Development District Sales Tax Revenue Bonds			
10/11/06	17,520,000	Transportation Development District Sales Tax Revenue Bonds (The Legends at Village West Project), Series 2006	10/01/28
02/15/06	2,415,000	Transportation Development District Sales Tax Revenue Bonds (NFM/Cabela's Project), Series 2006	12/01/27
01/31/13	9,975,000	Transportation Development District Sales Tax Revenue Bonds (Plaza at Speedway Project), Series 2013	03/01/32
05/29/14	317,000	Transportation Development District Sales Tax Revenue Bonds (Happy Foods Project), Series 2014	06/01/24
05/29/14	1,459,000	Transportation Development District Sales Tax Revenue Bonds (Prescott Plaza Project), Series 2014	06/01/24

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
Special Obligation Revenue Bonds – Economic Development			
01/22/99	24,400,413	Kansas International Speedway Corporation	12/01/27
10/05/12	6,445,000	39 th & Rainbow North, Series 2012	03/09/27
01/31/13	33,550,000	Plaza at Speedway, Series 2013	03/01/27
11/19/14	10,885,000	Kansas International Speedway Corporation Refunding Bonds, Series 2014	12/01/27
02/11/16	14,550,000	Wyandotte Plaza, Series 2016	06/01/27
03/15/16	2,615,000	39 th & Rainbow South Fixed Rate, Series 2016-A	04/01/20
03/15/16	1,578,000	39 th & Rainbow South Variable Rate, Series 2016-B	04/01/20
08/26/15	65,229,560	Vacation Village Project Area 4 – Major Multi-Sport Athletic Complex Project, Series 2015	
10/13/15	72,900,000	Vacation Village Project Areas 1 and 2a, Series 2015-A	09/01/31
10/13/15	12,260,000	Vacation Village Project Areas 1 and 2a, Series 2015-B	09/01/35
06/14/18	26,805,000	Legends Garage and West Lawn Community Improvement District Sales Tax Revenue Bonds, Series 2018	06/01/40

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
Utility System Revenue Bonds			
01/31/03	12,308,750	KDHE (2003)	08/01/24
03/28/03	5,467,500	KDHE (2003)	08/01/24
01/07/05	9,000,000	KDHE (2005)	02/01/27
03/07/12	12,230,500	KDHE (2012)	08/01/33
06/01/14	13,000,000	KDHE (2014)	08/01/35
02/05/09	57,575,000	Utility System Improvement Revenue Bonds, Series 2009-A	09/01/34
02/04/10	32,190,000	Utility System Refunding Revenue Bonds, Series 2010-A	09/01/28
05/19/11	90,000,000	Utility System Improvement and Refunding Revenue Bonds, Series 2011-A	09/01/36
09/06/12	110,830,000	Utility System Refunding Revenue Bonds, Series 2012-A	09/01/32
12/17/12	79,540,000	Utility System Refunding Revenue Bonds, Series 2012-B	09/01/37
06/24/14	190,620,000	Utility System Improvement and Refunding Bonds, Series 2014-A	09/01/44
08/01/14	266,750	Oracle Hyperion Budgeting Lease (2014)	05/01/18
06/01/15	2,727,127	Oracle Fusion & Hyperion Implementation (2015)	12/01/18
02/11/16	114,165,000	Utility System Improvement Bonds, Series 2016-A	09/01/45
12/08/16	42,545,000	Utility System Refunding Bonds, Series 2017-A	09/01/34
12/08/16	56,265,000	Utility System Improvement Bonds, Series 2017-B	09/01/46

EXHIBIT A-2

LIST OF CONDUIT TAX-EXEMPT BONDS COVERED BY THIS COMPLIANCE PROCEDURE
(Last updated June 30, 2018)

<u>Issue Date</u>	<u>Original Principal Amount</u>	<u>Title of Issue</u>	<u>Final Maturity</u>
Housing Revenue Bonds			
07/30/12	21,000,000	Multifamily Housing Revenue Bonds (Heights of Delaware Ridge Project), Series 2012	04/01/23
501(c)3 Bonds			
01/01/07	4,970,000	Wyandotte Center for Community Behavioral Healthcare, Inc. Project, Series 2005 (reissued in 2007)	04/01/25

EXHIBIT B

****NOTE THIS SAMPLE ANNUAL COMPLIANCE CHECKLIST IS INTENDED ONLY AS AN ILLUSTRATION AND SHOULD BE MODIFIED TO ACCOUNT FOR SPECIAL CIRCUMSTANCES OF EACH GOVERNMENTAL TAX-EXEMPT BOND ISSUE. FOR EXAMPLE, IF THE PROJECT FACILITY IS TO BE MANAGED UNDER A QUALIFIED MANAGEMENT AGREEMENT THAT BOND COUNSEL HAS APPROVED, ONLY CHANGES TO THAT MANAGEMENT AGREEMENT SHOULD TRIGGER BOND COUNSEL REVIEW, ETC. ****

SAMPLE

ANNUAL COMPLIANCE CHECKLIST FOR GOVERNMENTAL TAX-EXEMPT BONDS

Name of tax-exempt bonds (“Bonds”) financing Financed

Asset..... _____

Issue Date of Bonds..... _____

Name of Bond Compliance Officer _____

Period covered by request (“Annual Period”) _____

Description of Project Facility

(Note: in lieu of completing the table below, the Issuer may attach a copy of the Preliminary Cost Allocation or Final Written Allocation, as may be updated from time to time)

Description	Actual Date Placed in Service	Estimated Useful Life	Actual Total Cost	Actual Amount Financed From Bonds

<u>Item</u>	<u>Question</u>	<u>Response</u>
<p>1 Ownership</p>	<p>Was the entire Project Facility owned by the Issuer during the entire Annual Period?</p> <p>If answer above was “No,” was an Opinion of Bond Counsel obtained prior to the transfer?</p> <p>If Yes, include a copy of the Opinion in the Tax-Exempt Bond File.</p> <p>If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2 Leases & Other Rights to Possession</p>	<p>During the Annual Period, was any part of the Project Facility leased at any time pursuant to a lease or similar agreement for more than 50 days?</p> <p>If answer above was “Yes,” was an Opinion of Bond Counsel obtained prior to entering into the lease or other arrangement?</p> <p>If Yes, include a copy of the Opinion in the Tax-Exempt Bond File.</p> <p>If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>3 Management or Service Agreements</p>	<p>During the Annual Period, has the management of all or any part of the operations of the Financed Asset (e.g., cafeteria, gift shop, etc.) been assumed by or transferred to another entity?</p> <p>If answer above was “Yes,” was an Opinion of Bond Counsel obtained prior to entering into the management agreement?</p> <p>If Yes, include a copy of the Opinion in the Tax-Exempt Bond File.</p> <p>If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

<u>Item</u>	<u>Question</u>	<u>Response</u>
4 Other Use	<p>Was any other agreement entered into with an individual or entity that grants special legal rights to the Financed Asset?</p> <p>If answer above was "Yes," was an Opinion of Bond Counsel obtained prior to entering into the agreement?</p> <p>If Yes, include a copy of the Opinion in the Tax-Exempt Bond File.</p> <p>If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
5 Arbitrage & Rebate	<p>Have all rebate and yield reduction calculations mandated in the Tax Compliance Agreement been prepared for the current year?</p> <p>If No, contact Rebate Analyst and incorporate report or include description of resolution in the Tax-Exempt Bond File.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Bond Compliance Officer: _____

Date Completed: _____