

NEW ISSUES

SERIAL BONDS AND BOND ANTICIPATION NOTES

In the opinion of Orrick, Herrington & Sutcliffe LLP, Bond Counsel, based upon an analysis of existing laws, regulations, rulings and court decisions, and assuming among other matters, the accuracy of certain representations and compliance with certain covenants, interest on the Bonds and the Notes is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986, as amended. In the further opinion of Bond Counsel, interest on the Bonds and the Notes is not a specific preference item for purposes of the federal individual alternative minimum tax. Interest on the Bonds and the Notes included in adjusted financial statement income of certain corporations is not excluded from the federal corporate alternative minimum tax. Bond Counsel is also of the opinion that interest on the Bonds and the Notes is exempt from personal income taxes imposed by the State of New York or any political subdivision thereof (including The City of New York). Bond Counsel expresses no opinion regarding any other tax consequences related to the ownership or disposition of, or the amount, accrual or receipt of interest on, the Bonds or the Notes. See “TAX MATTERS” herein.

The District will NOT designate the Bonds or the Notes as “qualified tax-exempt obligations” pursuant to Section 265(b)(3) of the Internal Revenue Code of 1986.

**HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN
DUTCHESS AND PUTNAM COUNTIES, NEW YORK**

\$1,300,000*

**SCHOOL DISTRICT (SERIAL) BONDS, 2026
(the “Bonds”)**

Date of Issue: Date of Delivery

Maturity Dates: June 1, 2027 – 2040

\$20,181,294

**BOND ANTICIPATION NOTES, 2026 SERIES A
(the “Notes”)**

Date of Issue: June 11, 2026

Maturity Date: June 11, 2027

The Bonds and the Notes are general obligations of the Haldane Central School District at Philipstown, in Dutchess and Putnam Counties, New York (the “District”), and will contain a pledge of the faith and credit of the District for the payment of the principal thereof and interest thereon and, unless paid from other sources, the Bonds and the Notes are payable from ad valorem taxes which may be levied upon all the taxable real property within the District without limitation as to rate or amount. (See “*Nature Of Obligation*” and “*Tax Levy Limit Law*” herein.)

The Bonds are dated their Date of Delivery and will bear interest from that date until maturity at the annual rate or rates as specified by the purchaser of the Bonds, payable semiannually on June 1 and December 1 in each year until maturity, commencing June 1, 2027. The Bonds shall mature on the dates and in the principal amounts specified on the inside cover page hereof. The Bonds will not be subject to redemption prior to maturity as described herein. (See “*No Optional Redemption*” herein.)

The Notes are dated their Date of Issue and bear interest from that date until the Maturity Date, at the annual rate(s) as specified by the purchaser(s) of the Notes. At the option of the purchaser(s), the Notes will be (i) registered in the name of the successful bidder(s) or (ii) registered to Cede & Co., as the partnership nominee for The Depository Trust Company, New York, New York (“DTC”) as book-entry notes. The Notes will not be subject to redemption prior to maturity as described herein. (See “*No Optional Redemption*” herein.)

If the Notes are issued in registered form registered in the name of the successful bidder(s), a single note certificate will be issued for those Notes bearing the same rate of interest in the aggregate principal amount awarded to such purchaser at such interest rate. Principal of and interest on such Notes will be payable in Federal Funds by the District, at such bank or trust company located and authorized to do business in the State of New York as selected by the successful bidders as an expense thereof.

If the Notes are issued in book-entry form, such Notes will be delivered to DTC, which will act as securities depository for the Notes. The Bonds will be issued in book-entry form and will be registered to Cede & Co., as the partnership nominee for DTC, which will act as securities depository for the Bonds. Individual purchases of the Bonds and such Notes may be made in book-entry form only, in principal amounts of \$5,000 or integral multiples thereof, except for one necessary odd denomination of the Notes that is or includes \$6,294. Purchasers will not receive certificates representing their ownership interests in the Bonds and the Notes issued in book-entry form. Payment of the principal of and interest on such Bonds and Notes will be made by the District to DTC, which will in turn remit such principal and interest to its participants for subsequent disbursement to the beneficial owners of such Bonds and Notes as described herein. (See “*Description of Book-Entry System*” herein.)

The Bonds and Notes are offered when, as and if issued and received by the purchaser(s) subject to the receipt of the respective final approving opinions of Orrick, Herrington & Sutcliffe LLP, New York, New York, Bond Counsel. It is anticipated that the delivery of the Notes will be made on or about June 11, 2026, through the facilities of DTC or as otherwise agreed by the purchaser and the District. It is anticipated that delivery of the Bonds will be made on or about June 11, 2026, through the facilities of DTC.

THIS PRELIMINARY OFFICIAL STATEMENT IS IN A FORM DEEMED FINAL BY THE DISTRICT FOR PURPOSES OF SECURITIES AND EXCHANGE COMMISSION RULE 15c2-12 (THE “RULE”). FOR A DESCRIPTION OF THE DISTRICT’S AGREEMENT TO PROVIDE CONTINUING DISCLOSURE AS DESCRIBED IN THE RULE, SEE “DISCLOSURE UNDERTAKINGS” HEREIN.

Dated: May __, 2026

*Preliminary subject to change.

This Preliminary Official Statement and the information contained herein are subject to completion or amendment without notice. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of these securities, in any jurisdiction in which such offer, solicitation, or sale would be unlawful prior to registration or qualification under the securities laws of such jurisdiction.

The Bonds will mature on the dates and in the amounts as set forth below:

| <u>Date</u> | <u>Principal Amount*</u> | <u>Coupon</u> | <u>Yield</u> | <u>CUSIP**</u> |
|--------------|------------------------------|---------------|--------------|----------------|
| June 1, 2027 | \$75,000 | | | |
| June 1, 2028 | 80,000 | | | |
| June 1, 2029 | 80,000 | | | |
| June 1, 2030 | 85,000 | | | |
| June 1, 2031 | 85,000 | | | |
| June 1, 2032 | 90,000 | | | |
| June 1, 2033 | 90,000 | | | |
| June 1, 2034 | 95,000 | | | |
| June 1, 2035 | 95,000 | | | |
| June 1, 2036 | 95,000 | | | |
| June 1, 2037 | 100,000 | | | |
| June 1, 2038 | 105,000 | | | |
| June 1, 2039 | 110,000 | | | |
| June 1, 2040 | 115,000 | | | |

* The principal maturities of the Bonds are subject to adjustment following their sale, pursuant to the terms of the accompanying Notice of Bond Sale.

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**HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN
DUTCHESS AND PUTNAM COUNTIES, NEW YORK**

BOARD OF EDUCATION 2025-2026

Dr. Peggy Clements.....President
Maggie Valentine.....Vice President
Ezra Clementson.....Trustee
Dr. Michelle Kupper.....Trustee
Sean McNall.....Trustee

DISTRICT OFFICIALS

Dr. Gail Duffy Superintendent of Schools
Catherine Platt School Business Manager
Megan Shields..... District Clerk

BOND COUNSEL

**Orrick, Herrington & Sutcliffe LLP
New York, New York**

MUNICIPAL ADVISOR



**Long Island & Western New York
(516) 274-4502**

No dealer, broker, salesman or other person has been authorized by the District to give any information or to make any representations, other than those contained in this Official Statement and if given or made, such other information or representations must not be relied upon as having been authorized by the foregoing. This Official Statement does not constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of the Notes by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale. The information set forth herein has been obtained by the District from sources which are believed to be reliable but it is not guaranteed as to accuracy or completeness. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in the affairs of the District since the date hereon.

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OFFICIAL STATEMENT

HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN DUTCHESS AND PUTNAM COUNTIES, NEW YORK

relating to

\$1,300,000*

**SCHOOL DISTRICT (SERIAL) BONDS, 2026
(the “Bonds”)**

and

\$20,181,294

**BOND ANTICIPATION NOTES, 2026 SERIES A
(the “Notes”)**

This Official Statement, including the cover page, inside cover page and appendix hereto, presents certain information relating to the Haldane Central School District at Philipstown in Dutchess and Putnam Counties, State of New York (the "District," "Counties" and "State," respectively) in connection with the sale of \$1,300,000* School District (Serial) Bonds, 2026 (the “Bonds”)and \$20,181,294 Bond Anticipation Notes, 2026 Series A (the “Notes”).

All quotations from and summaries and explanations of provisions of the Constitution and laws of the State and acts and proceedings of the District contained herein do not purport to be complete and are qualified in their entirety by reference to the official compilations thereof and all references to the Bonds and the Notes and the proceedings of the District relating thereto are qualified in their entirety by reference to the definitive form of the Bonds and the Notes and such proceedings.

THE BONDS

Description of the Bonds

The Bonds are dated their date of delivery and will bear interest from such date until maturity at the annual rate or rates as specified on the inside cover page hereof, payable semiannually on June 1 and December 1 in each year until maturity, commencing June 1, 2027. The Bonds will mature on the dates and in the amounts specified on the inside cover page hereof. The Bonds are not subject to optional redemption prior to maturity. (See “*No Optional Redemption*” herein.)

The Bonds will be issued as registered bonds, registered to the Depository Trust Company (“DTC”).

The Bonds will be registered in the name of Cede & Co., as nominee of DTC, which will act as securities depository for the Bonds. Individual purchases will be made in book-entry form, in the principal amount of \$5,000 or integral multiples thereof. Purchasers of the Bonds will not receive certificates representing their ownership interest in the Bonds. Payments of principal of and interest on the Bonds will be made by the District to DTC, which will in turn remit such principal and interest to its Participants, for subsequent distribution to the Beneficial Owners of the Bonds.

The record date for payment of principal of and interest on the Bonds will be the fifteenth day (whether or not a business day) of the calendar month immediately preceding each interest payment date.

Authority for and Purpose of the Bonds

The Bonds are issued pursuant to the State Constitution and statutes of the State, including among others, the Education Law and the Local Finance Law, and a bond resolution adopted by the Board of Education on June 4, 2019 for the issuance of serial bonds and notes to pay the cost of construction improvements to and reconstruction of District buildings and facilities. The proceeds from the sale of the Bonds, together with \$25,000 in available funds, will be used to redeem the District’s \$1,325,000 Bond Anticipation Notes, 2025 Series A, which mature on June 12, 2026.

*Preliminary subject to change.

THE NOTES

Description of the Notes

The Notes will be dated and will mature as reflected on the cover page hereof.

The Notes will not be subject to redemption prior to maturity. Interest will be calculated on a 30-day month and 360-day year basis, payable at maturity.

The District will act as Paying Agent for any Notes issued in book-entry form. Paying agent fees, if any, for non-book-entry notes will be paid by the purchaser(s). The District's contact information is Ms. Catherine Platt, School Business Manager, (845) 269-9254 ext. 112, email: cplatt@haldaneschool.org.

Authority for and Purpose of the Notes

The Notes are issued pursuant to the State Constitution and statutes of the State, including among others, the Education Law and the Local Finance Law, and a bond resolution adopted on March 18, 2025 by the Board of Education for the issuance of serial bonds and notes to pay the cost of construction improvements to and reconstruction of District buildings and facilities (the "Project"). The proceeds from the sale of the Notes, in the amount of \$500,000, will be used to redeem the District's outstanding Bond Anticipation Notes, 2025 Series C, which mature on June 12, 2026. The remaining proceeds of the Notes, in the amount of \$19,681,294, will provide additional original financing for the Project.

THE BONDS AND THE NOTES

No Optional Redemption

The Bonds and the Notes will not be subject to optional redemption prior to maturity.

Nature of Obligation

Each Bond and Note when duly issued and paid for will constitute a contract between the District and the holder thereof.

Holders of any series of notes or bonds of the District may bring an action or commence a proceeding in accordance with the civil practice law and rules to enforce the rights of the holders of such series of notes or bonds.

The Bonds and the Notes will be general obligations of the District and will contain a pledge of the faith and credit of the District for the payment of the principal thereof and the interest thereon as required by the Constitution and laws of the State. For the payment of such principal and interest, the District has power and statutory authorization to levy ad valorem taxes on all real property within the District subject to such taxation by the District subject to applicable statutory limitations. (See "*The Tax Levy Limit Law*" herein.)

Although the State Legislature is restricted by Article VIII, Section 12 of the State Constitution from imposing limitations on the power to raise taxes to pay "interest on or principal of indebtedness theretofore contracted" prior to the effective date of any such legislation, the New York State Legislature may from time to time impose additional limitations or requirements on the ability to increase a real property tax levy or on the methodology, exclusions or other restrictions of various aspects of real property taxation (as well as on the ability to issue new indebtedness). On June 24, 2011, Chapter 97 of the Laws of 2011 was signed into law by the Governor, as amended, (the "Tax Levy Limit Law"). The Tax Levy Limit Law applies to local governments and school districts in the State (with certain exceptions) and imposes additional procedural requirements on the ability of municipalities and school districts to levy certain year-to-year increases in real property taxes.

Under the Constitution of the State, the District is required to pledge its faith and credit for the payment of the principal of and interest on the Bonds and the Notes and is required to raise real estate taxes, and without specification, other revenues, if such levy is necessary to repay such indebtedness. While the Tax Levy Limit Law imposes a statutory limitation on the District's power to increase its annual tax levy with the amount of such increase limited by the formulas set forth in the Tax Levy Limit Law, it also provides the procedural method to surmount that limitation. See "The Tax Levy Limit Law," herein.

The Constitutionally-mandated general obligation pledge of municipalities and school districts in New York State has been

interpreted by the Court of Appeals, the State's highest court, in Flushing National Bank v. Municipal Assistance Corporation for the City of New York, 40 N.Y.2d 731 (1976), as follows:

“A pledge of the City's faith and credit is both a commitment to pay and a commitment of the city's revenue generating powers to produce the funds to pay. Hence, an obligation containing a pledge of the City's “faith and credit” is secured by a promise both to pay and to use in good faith the City's general revenue powers to produce sufficient funds to pay the principal and interest of the obligation as it becomes due. That is why both words, “faith” and “credit” are used and they are not tautological. That is what the words say and this is what the courts have held they mean . . . So, too, although the Legislature is given the duty to restrict municipalities in order to prevent abuses in taxation, assessment, and in contracting of indebtedness, it may not constrict the City's power to levy taxes on real estate for the payment of interest on or principal of indebtedness previously contracted. While phrased in permissive language, these provisions, when read together with the requirement of the pledge and faith and credit, express a constitutional imperative: debt obligations must be paid, even if tax limits be exceeded”.

In addition, the Court of Appeals in the Flushing National Bank (1976) case has held that the payment of debt service on outstanding general obligation bonds and notes takes precedence over fiscal emergencies and the police power of political subdivisions in New York State.

The pledge has generally been understood as a promise to levy property taxes without limitation as to rate or amount to the extent necessary to cover debt service due to language in Article VIII Section 10 of the Constitution which provides an exclusion for debt service from Constitutional limitations on the amount of a real property tax levy, insuring the availability of the levy of property tax revenues to pay debt service. As the Flushing National Bank (1976) Court noted, the term “faith and credit” in its context is “not qualified in any way”. Indeed, in Flushing National Bank v. Municipal Assistance Corp., 40 N.Y.2d 1088 (1977) the Court of Appeals described the pledge as a direct constitutional mandate. In Quirk v. Municipal Assistance Corp., 41 N.Y.2d 644 (1977), the Court of Appeals stated that, while holders of general obligation debt did not have a right to particular revenues such as sales tax, “with respect to traditional real estate tax levies, the bondholders are constitutionally protected against an attempt by the State to deprive the city of those revenues to meet its obligations.” According to the Court in Quirk, the State Constitution “requires the city to raise real estate taxes, and without specification other revenues, if such a levy be necessary to repay indebtedness.”

In addition, the Constitution of the State requires that every county, city, town, village, and school district in the State provide annually by appropriation for the payment of all interest and principal on its serial bonds and certain other obligations, and that, if at any time the respective appropriating authorities shall fail to make such appropriation, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. In the event that an appropriating authority were to make an appropriation for debt service and then decline to expend it for that purpose, this provision would not apply. However, the Constitution of the State does also provide that the fiscal officer of any county, city, town, village, or school district may be required to set apart and apply such first revenues at the suit of any holder of any such obligations.

In Quirk v. Municipal Assistance Corp., the Court of Appeals described this as a “first lien” on revenues, but one that does not give holders a right to any particular revenues. It should thus be noted that the pledge of the faith and credit of a political subdivision in New York State is a pledge of an issuer of a general obligation bond or note to use its general revenue powers, including, but not limited to, its property tax levy to pay debt service on such obligations, but that such pledge may not be interpreted by a court of competent jurisdiction to include a constitutional or statutory lien upon any particular revenues.

While the courts in New York State have historically been protective of the rights of holders of general obligation debt of political subdivisions, it is not possible to predict what a future court might hold.

REMEDIES UPON DEFAULT

State Aid Intercept For School Districts. In the event of a default in the payment of the principal of and/or interest on the Bonds or the Notes, the State Comptroller is required to withhold, under certain conditions prescribed by Section 99-b of the State Finance Law, state aid and assistance to the District and to apply the amount thereof so withheld to the payment of such defaulted principal and/or interest, which requirement constitutes a covenant by the State with the holders from time to time of the Bonds and the Notes. The covenant between the State of New York and the purchasers and the holders and owners from time to time of the notes and bonds issued by the school districts in the State for school purposes provides that it will not repeal, revoke or rescind the provisions of Section 99-b, or amend or modify the same so as to limit, impair or impede the rights and remedies granted thereby.

Said section provides that in the event a holder or owner of any bond issued by a school district for school purposes shall file with the State Comptroller a verified statement describing such bond and alleging default in the payment thereof or the interest thereon or both, it shall be the duty of the State Comptroller to immediately investigate the circumstances of the alleged default and prepare and file in his office a certificate setting forth his determinations with respect thereto and to serve a copy thereof by registered mail upon the chief fiscal officer of the school district which issued the bond. Such investigation by the State Comptroller shall cover the current status with respect to the payment of principal of and interest on all outstanding bonds of such school district issued for school purposes and the statement prepared and filed by the State Comptroller shall set forth a description of all such bonds of the school district found to be in default and the amount of principal and interest thereon past due.

Upon the filing of such a certificate in the office of the State Comptroller, he shall thereafter deduct and withhold from the next succeeding allotment, apportionment or payment of such State aid or assistance due to such school district such amount thereof as may be required to pay (a) the school district's contribution to the State teachers retirement system, and (b) the principal of and interest on such bonds of such school district then in default. In the event such State aid or assistance initially so withheld shall be insufficient to pay said amounts in full, the State Comptroller shall similarly deduct and withhold from each succeeding allotment, apportionment or payment of such State aid or assistance due such school district such amount or amounts thereof as may be required to cure such default. Allotments, apportionments and payments of such State aid so deducted or withheld by the State Comptroller for the payment of principal and interest on bonds shall be forwarded promptly to the paying agent or agents for the bonds in default of such school district for the sole purpose of the payment of defaulted principal of and interest on such bonds. If any of such successive allotments, apportionments or payments of such State Aid so deducted or withheld shall be less than the amount of all principal and interest on the bonds in default with respect to which the same was so deducted or withheld, then the State Comptroller shall promptly forward to each paying agent an amount in the proportion that the amount of such bonds in default payable to such paying agent bears to the total amount of the principal and interest then in default on such bonds of such school district. The State Comptroller shall promptly notify the chief fiscal officer of such school district of any payment or payments made to any paying agent or agents of defaulted bonds pursuant to said Section 99-b.

General Municipal Law Contract Creditors' Provision. Each Note when duly issued and paid for will constitute a contract between the District and the holder thereof. Under current law, provision is made for contract creditors of the District to enforce payments upon such contracts, if necessary, through court action. Section 3-a of the General Municipal Law provides, subject to exceptions not pertinent, that the rate of interest to be paid by the District upon any judgment or accrued claim against it on an amount adjudged due to a creditor shall not exceed nine per centum per annum from the date due to the date of payment. This provision might be construed to have application to the holders of the Bonds and the Notes in the event of a default in the payment of the principal of and interest on the Bonds and the Notes.

Execution/Attachment of Municipal Property. As a general rule, property and funds of a municipal corporation serving the public welfare and interest have not been judicially subjected to execution or attachment to satisfy a judgment, although judicial mandates have been issued to officials to appropriate and pay judgments out of certain funds or the proceeds of a tax levy. In accordance with the general rule with respect to municipalities, judgments against the District may not be enforced by levy and execution against property owned by the District.

Authority to File For Municipal Bankruptcy. The Federal Bankruptcy Code allows public bodies, such as municipalities, recourse to the protection of a Federal Court for the purpose of adjusting outstanding indebtedness. Section 85.80 of the Local Finance Law contains specific authorization for any municipality in the State or its emergency control board to file a petition under any provision of Federal bankruptcy law for the composition or adjustment of municipal indebtedness. While this Local Finance Law provision does not apply to school districts, there can be no assurance that it will not be made so applicable in the future.

State Debt Moratorium Law. There are separate State law provisions regarding debt service moratoriums enacted into law in 1975.

At the Extraordinary Session of the State Legislature held in November, 1975, legislation was enacted which purported to suspend the right to commence or continue an action in any court to collect or enforce certain short-term obligations of The City of New York. The effect of such act was to create a three-year moratorium on actions to enforce the payment of such obligations. On November 19, 1976, the Court of Appeals, the State's highest court, declared such act to be invalid on the ground that it violates the provisions of the State Constitution requiring a pledge by such City of its faith and credit for the payment of obligations.

As a result of the Court of Appeals decision in Flushing National Bank v. Municipal Assistance Corporation for the City of New York, 40 N.Y.2d 731 (1976), the constitutionality of that portion of Title 6-A of Article 2 of the Local Finance Law enacted at the 1975 Extraordinary Session of the State legislature authorizing any county, city, town or village with respect to which the State has declared a financial emergency to petition the State Supreme Court to stay the enforcement against such municipality of any claim for payment relating to any contract, debt or obligation of the municipality during the emergency period, is subject to doubt. In any event, no such emergency has been declared with respect to the District.

Constitutional Non-Appropriation Provision. There is in the Constitution of the State, Article VIII, Section 2, the following provision relating to the annual appropriation of monies for the payment of due principal of and interest on indebtedness of every county, city, town, village and school district in the State: “If at any time the respective appropriating authorities shall fail to make such appropriations, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. The fiscal officer of any county, city, town, village or school district may be required to set aside and apply such revenues as aforesaid at the suit of any holder of obligations issued for any such indebtedness.” This constitutes a specific non-exclusive constitutional remedy against a defaulting municipality or school district; however, it does not apply in a context in which monies have been appropriated for debt service but the appropriating authorities decline to use such monies to pay debt service. However, Article VIII, Section 2 of the Constitution of the State also provides that the fiscal officer of any county, city, town, village or school district may be required to set apart and apply such revenues at the suit of any holder of any obligations of indebtedness issued with the pledge of the faith of the credit of such political subdivision. See “General Municipal Law Contract Creditors’ Provision” herein.

The Constitutional provision providing for first revenue set asides does not apply to tax anticipation notes, revenue anticipation notes or bond anticipation notes.

Default Litigation. In prior years, certain events and legislation affecting a holder’s remedies upon default have resulted in litigation. While courts of final jurisdiction have upheld and sustained the rights of noteholders, such courts might hold that future events including financial crises as they may occur in the State and in political subdivisions of the State, require the exercise by the State or its political subdivisions of emergency and police powers to assure the continuation of essential public services prior to the payment of debt service. See “Nature of Obligation” and “State Debt Moratorium Law” herein.

No Past Due Debt

No principal or interest payment on District indebtedness is past due. To the best knowledge of District officials, the District has never defaulted on the payment of the principal of and/or interest on any indebtedness.

DESCRIPTION OF BOOK-ENTRY SYSTEM

The Depository Trust Company (“DTC”) will act as securities depository for the Bonds and for those Notes issued in book-entry form. The Bonds and those Notes will be issued as fully-registered securities registered in the name of Cede & Co. (DTC’s partnership nominee) or such other name as may be requested by an authorized representative of DTC. One fully registered bond certificate will be issued for each maturity of the Bonds and will be deposited with DTC. One fully registered note certificate will be issued for the Notes bearing the same rate of interest and CUSIP number, and will be deposited with DTC.

DTC, the world’s largest depository, is a limited-purpose trust company organized under the New York Banking Law, a “banking organization” within the meaning of the New York Banking Law, a member of the Federal Reserve System, a “clearing corporation” within the meaning of the New York Uniform Commercial Code, and a “clearing agency” registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC’s participants (“Direct Participants”) deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants’ accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations. DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation (“DTCC”). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies. DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly (“Indirect Participants”). The DTC Rules

applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at www.dtcc.com and www.dtc.org.

Purchases of the Bonds and the Notes under the DTC system must be made by or through Direct Participants, which will receive a credit for the Bonds and the Notes on DTC's records. The ownership interest of each actual purchaser of each bond ("Beneficial Owner") is in turn to be recorded on the Direct and Indirect Participants' records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the Bonds and the Notes are to be accomplished by entries made on the books of Direct and Indirect Participants acting on behalf of Beneficial Owners. Beneficial Owners will not receive certificates representing their ownership interests in the Bonds and the Notes, except in the event that use of the book-entry system for the Bonds and the Notes is discontinued.

To facilitate subsequent transfers, all Bonds and Notes deposited by Direct Participants with DTC are registered in the name of DTC's partnership nominee, Cede & Co., or such other name as may be requested by an authorized representative of DTC. The deposit of the Bonds and the Notes with DTC and their registration in the name of Cede & Co. or such other DTC nominee do not effect any change in beneficial ownership. DTC has no knowledge of the actual Beneficial Owners of the Bonds and the Notes; DTC's records reflect only the identity of the Direct Participants to whose accounts such Bonds and Notes are credited, which may or may not be the Beneficial Owners. The Direct and Indirect Participants will remain responsible for keeping account of their holdings on behalf of their customers.

Conveyance of notices and other communications by DTC to Direct Participants, by Direct Participants to Indirect Participants, and by Direct Participants and Indirect Participants to Beneficial Owners will be governed by arrangements among them, subject to any statutory or regulatory requirements as may be in effect from time to time.

Redemption notices shall be sent to DTC. If less than all of the Securities within an issue are being redeemed, DTC's practice is to determine by lot the amount of the interest of each Direct Participant in such issue to be redeemed.

Neither DTC nor Cede & Co. (nor any other DTC nominee) will consent or vote with respect to the Bonds and the Notes unless authorized by a Direct Participant in accordance with DTC's MMI Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the District as soon as possible after the record date. The Omnibus Proxy assigns Cede & Co.'s consenting or voting rights to those Direct Participants to whose accounts the Bonds and the Notes are credited on the record date (identified in a listing attached to the Omnibus Proxy).

Principal and interest payments on the Bonds and the Notes will be made to Cede & Co., or such other nominee as may be requested by an authorized representative of DTC. DTC's practice is to credit Direct Participants' accounts upon DTC's receipt of funds and corresponding detail information from the District, on payable date in accordance with their respective holdings shown on DTC's records. Payments by Participants to Beneficial Owners will be governed by standing instructions and customary practices, as is the case with securities held for the accounts of customers in bearer form or registered in "street name," and will be the responsibility of such Participant and not of DTC or the District, subject to any statutory or regulatory requirements as may be in effect from time to time. Payment of redemption proceeds, distributions, and dividend payments to Cede & Co. (or such other nominee as may be requested by an authorized representative of DTC) is the responsibility of the District, disbursement of such payments to Direct Participants will be the responsibility of DTC, and disbursement of such payments to the Beneficial Owners will be the responsibility of Direct and Indirect Participants.

DTC may discontinue providing its services as depository with respect to the Bonds and the Notes at any time by giving reasonable notice to the District. Under such circumstances, in the event that a successor depository is not obtained, bond and note certificates are required to be printed and delivered.

The District may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, bond and note certificates will be printed and delivered to DTC.

The information in this section concerning DTC and DTC's book-entry system has been obtained from sources that the District believes to be reliable, but the District takes no responsibility for the accuracy thereof.

Source: The Depository Trust Company

RISK FACTORS

There are certain potential risks associated with an investment in the Bonds and the Notes, and investors should be thoroughly familiar with this Official Statement, including its appendices, in order to make an informed investment decision. Investors should consider, in particular, the following factors:

The District's credit rating could be affected by circumstances beyond the District's control. Economic conditions such as the rate of unemployment and inflation, termination of commercial operations by corporate taxpayers and employers, as well as natural catastrophes, could adversely affect the assessed valuation of District property and its ability to maintain fund balances and other statistical indices commensurate with its current credit rating. Accordingly, a decline in the District's credit rating could adversely affect the market value of the Bonds and the Notes.

In addition, if and when a holder of any of the Bonds and the Notes should elect to sell a Bond or Note prior to its maturity, there can be no assurance that a market shall have been established, maintained and be in existence for the purchase and sale of any Bonds and the Notes. The price or principal value of the Bonds and the Notes is dependent on the prevailing level of interest rates. If interest rates should increase, the price of a bond or note may decline causing the bond or noteholder to potentially incur a capital loss if such bond or note is sold prior to its maturity.

The financial condition of the District as well as the market for the Bonds and the Notes could be affected by a variety of factors, some of which are beyond the District's control. There can be no assurance that adverse events in the State, including, for example, the seeking by a municipality of remedies pursuant to the Federal Bankruptcy Act or otherwise, will not occur which might affect the market price of and the market for the Bonds and the Notes. If a significant default or other financial crisis should occur in the affairs of the State or at any of its agencies or political subdivisions thereby further impairing the acceptability of obligations issued by borrowers within the State, both the ability of the District to arrange for additional borrowings and the market for and market value of outstanding debt obligations, including the Bonds and the Notes, could be adversely affected.

The District relies in part on State aid to fund its operations. There can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. The availability of such monies and the timeliness of such payment may also be affected by a delay in the adoption of the State budget, the State's economy and financial condition and other circumstances. In any event, State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. (See "*State Aid*" and "*Events Affecting New York School Districts*" herein).

An outbreak of disease or similar public health threat, such as the COVID-19 outbreak, or fear of such an event, could have an adverse impact on the District's financial condition and operating results by potentially delaying the receipt of real property taxes or resulting in a delay or reduction by the State in the payment of State aid. (See "*COVID-19 Stimulus and Uses*" herein.)

Should the District fail to receive State aid expected from the State in the amounts or at the times expected, occasioned by a delay in the payment of such monies or by a reduction in State aid, the District is authorized by the Local Finance Law to provide operating funds by borrowing on account of the uncollected State aid.

CYBERSECURITY

The District, like many other public and private entities, relies on technology to conduct its operations. As a recipient and provider of personal, private, or sensitive information, the District faces multiple cyber threats including, but not limited to, hacking, viruses, malware and other attacks on computer and other sensitive digital networks and systems. To mitigate the risk of business operations impact and/or damage from cyber incidents or cyber-attacks, the District invests in various forms of cybersecurity and operational controls; however, no assurances can be given that such security and operational control measures will be completely successful to guard against cyber threats and attacks. The results of any such attack could impact business operations and/or damage District digital networks and systems and the costs of remedying any such damage could be substantial.

LITIGATION

In the opinion of the Attorney for the District, such claims and suits, individually or in the aggregate, are not likely to have a material adverse effect on the financial condition of the District.

The District is a party to various tax certiorari proceedings instituted by various taxpayers under Article 7 of the Real Property Tax Law. In these actions, taxpayers have claimed that real property assessments as presently determined are excessive. Such claims seek to have the property assessment reduced and, generally, request a refund for a portion of the taxes previously paid. It is not possible to provide an estimate of the District's potential exposure with respect to pending certiorari claims. However, cases of this nature generally occur from year to year. Most claims are settled for amounts substantially below the assessment reduction specified in the original filing. As of June 30, 2025, the District had \$196,069 reserved for tax certiorari. If necessary, the District may issue debt to finance judgments or settled claims.

There is no action, suit, proceedings or investigation, at law or in equity, before or by any court, public board or body pending or, to the best knowledge of the District, threatened against or affecting the District to restrain or enjoin the issuance, sale or delivery of the Bonds and the Notes or any proceedings or authority of the District taken with respect to the authorization, issuance or sale of the Bonds and the Notes or contesting the corporate existence or boundaries of the District.

TAX MATTERS

In the opinion of Orrick, Herrington & Sutcliffe LLP (“Bond Counsel”), based upon an analysis of existing laws, regulations, rulings, and court decisions, and assuming, among other matters, the accuracy of certain representations and compliance with certain covenants, interest on the Bonds and the Notes is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986 (the “Code”) and is exempt from personal income taxes imposed by the State of New York or any political subdivision thereof (including The City of New York). Bond Counsel is of the further opinion that interest on the Bonds and the Notes is not a specific preference item for purposes of the federal individual alternative minimum tax. Interest on the Bonds and the Notes included in adjusted financial statement income of certain corporations is not excluded from the federal corporate alternative minimum tax. A complete copy of the proposed forms of opinions of Bond Counsel are set forth in Appendices D and E.

To the extent the issue price of any maturity of the Bonds and the Notes is less than the amount to be paid at maturity of such Bonds and Notes (excluding amounts stated to be interest and payable at least annually over the term of such Bonds and Notes), the difference constitutes “original issue discount,” the accrual of which, to the extent properly allocable to each owner thereof, is treated as interest on the Notes which is excluded from gross income for federal income tax purposes and exempt from State of New York personal income taxes. For this purpose, the issue price of a particular maturity of the Bonds and the Notes is the first price at which a substantial amount of such maturity of the Bonds and the Notes is sold to the public (excluding bond houses, brokers, or similar persons or organizations acting in the capacity of underwriters, placement agents or wholesalers). The original issue discount with respect to any maturity of the Bonds and the Notes accrues daily over the term to maturity of such Bonds and the Notes on the basis of a constant interest rate compounded semiannually (with straight-line interpolations between compounding dates). The accruing original issue discount is added to the adjusted basis of such Bonds and Notes to determine taxable gain or loss upon disposition (including sale, redemption, or payment on maturity) of such Bonds and Notes. Owners of the Bonds and the Notes should consult their own tax advisors with respect to the tax consequences of ownership of Bonds and Notes with original issue discount, including the treatment of owners who do not purchase such Bonds and Notes in the original offering to the public at the first price at which a substantial amount of such Bonds and Notes is sold to the public.

Bonds and Notes purchased, whether at original issuance or otherwise, for an amount higher than their principal amount payable at maturity (or, in some cases, at their earlier call date) (“Premium Obligations”) will be treated as having amortizable bond premium. No deduction is allowable for the amortizable bond premium in the case of bonds, like the Premium Obligations, the interest on which is excluded from gross income for federal income tax purposes. However, the amount of tax-exempt interest received, and an owner’s basis in a Premium Obligation, will be reduced by the amount of amortizable bond premium properly allocable to such owner. Owners of Premium Obligations should consult their own tax advisors with respect to the proper treatment of amortizable bond premium in their particular circumstances.

Bond Counsel is of further opinion that the amount treated as interest on the Bonds and the Notes and excluded from gross income will depend upon the taxpayer’s election under Internal Revenue Notice 94-84. Notice 94-84, 1994-2 C.B. 559, states that the Internal Revenue Service (the “IRS”) is studying whether the amount of the stated interest payable at maturity on short-term debt obligations (i.e., debt obligations with a stated fixed rate of interest which mature not more than one year

from the date of issue) that is excluded from gross income for federal income tax purposes should be treated (i) as qualified stated interest or (ii) as part of the stated redemption price at maturity of the short-term debt obligation, resulting in treatment as accrued original issue discount (the “original issue discount”). The Bonds and the Notes will be issued as short-term debt obligations. Until the IRS provides further guidance with respect to tax-exempt short-term debt obligations, taxpayers may treat the stated interest payable at maturity either as qualified stated interest or as includable in the stated redemption price at maturity, resulting in original issue discount as interest that is excluded from gross income for federal income tax purposes. However, taxpayers must treat the amount to be paid at maturity on all tax-exempt short-term debt obligations in a consistent manner. Taxpayers should consult their own tax advisors with respect to the tax consequences of ownership of Bonds and Notes if the taxpayer elects original issue discount treatment.

The Code imposes various restrictions, conditions and requirements relating to the exclusion from gross income for federal income tax purposes of interest on obligations such as the Bonds and the Notes. The District has covenanted to comply with certain restrictions designed to ensure that interest on the Bonds and the Notes will not be included in federal gross income. Inaccuracy of these representations or failure to comply with these covenants may result in interest on the Bonds and the Notes being included in gross income for federal income tax purposes possibly from the date of original issuance of the Bonds and the Notes. The opinion of Bond Counsel assumes compliance with these covenants. Bond Counsel has not undertaken to determine (or to inform any person) whether any actions taken (or not taken) or events occurring (or not occurring) after the date of issuance of the Bonds and the Notes may adversely affect the value of, or the tax status of interest on, the Bonds and the Notes. Further, no assurance can be given that pending or future legislation or amendments to the Code, if enacted into law, or any proposed legislation or amendments to the Code, will not adversely affect the value of, or the tax status of interest on, the Bonds and the Notes.

Certain requirements and procedures contained or referred to in the Arbitrage Certificate, and other relevant documents may be changed and certain actions (including, without limitation, economic defeasance of the Notes) may be taken or omitted under the circumstances and subject to the terms and conditions set forth in such documents. Bond Counsel expresses no opinion as to any Bonds and Notes or the interest thereon if any such change occurs or action is taken or omitted.

Although Bond Counsel is of the opinion that interest on the Bonds and the Notes is excluded from gross income for federal income tax purposes and is exempt from personal income taxes imposed by the State of New York or any political subdivision thereof (including The City of New York), the ownership or disposition of, or the amount, accrual or receipt of interest on, the Bonds and the Notes may otherwise affect an owner’s federal or state tax liability. The nature and extent of these other tax consequences will depend upon the particular tax status of the owner or the owner’s other items of income or deduction. Bond Counsel expresses no opinion regarding any such other tax consequences.

Current and future legislative proposals, if enacted into law, clarification of the Code or court decisions may cause interest on the Bonds and the Notes to be subject, directly or indirectly, to federal income taxation or to be subject to or exempted from state income taxation, or otherwise prevent owners from realizing the full current benefit of the tax status of such interest. The introduction or enactment of any such legislative proposals, clarification of the Code or court decisions may also affect the market price for, or marketability of, the Bonds and the Notes. Prospective purchasers of the Bonds and the Notes should consult their own tax advisors regarding any pending or proposed federal or state tax legislation, regulations or litigation, as to which Bond Counsel expresses no opinion.

The opinion of Bond Counsel is based on current legal authority, covers certain matters not directly addressed by such authorities, and represents Bond Counsel’s judgment as to the proper treatment of the Bonds and the Notes for federal income tax purposes. It is not binding on the Internal Revenue Service (“IRS”) or the courts. Furthermore, Bond Counsel cannot give and has not given any opinion or assurance about the future activities of the District, or about the effect of future changes in the Code, the applicable regulations, the interpretation thereof or the enforcement thereof by the IRS. The District has covenanted, however, to comply with the requirements of the Code.

Bond Counsel’s engagement with respect to the Bonds and the Notes ends with the issuance of the Bonds and the Notes, and, unless separately engaged, Bond Counsel is not obligated to defend the District or the owners regarding the tax-exempt status of the Bonds and the Notes in the event of an audit examination by the IRS. Under current procedures, owners would have little, if any, right to participate in the audit examination process. Moreover, because achieving judicial review in connection with an audit examination of tax-exempt bonds is difficult, obtaining an independent review of IRS positions with which the District legitimately disagrees, may not be practicable. Any action of the IRS, including but not limited to selection of the Bonds and the Notes for audit, or the course or result of such audit, or an audit of bonds presenting similar tax issues may affect the market price for, or the marketability of, the Bonds and the Notes, and may cause the District or the owners to incur significant expense.

Payments on the Bonds and the Notes generally will be subject to U.S. information reporting and possibly to “backup withholding.” Under Section 3406 of the Code and applicable U.S. Treasury Regulations issued thereunder, a non-corporate owner of Bonds and Notes may be subject to backup withholding with respect to “reportable payments,” which include interest paid on the Bonds and the Notes and the gross proceeds of a sale, exchange, redemption, retirement or other disposition of the Bonds and the Notes. The payor will be required to deduct and withhold the prescribed amounts if (i) the payee fails to furnish a U.S. taxpayer identification number (“TIN”) to the payor in the manner required, (ii) the IRS notifies the payor that the TIN furnished by the payee is incorrect, (iii) there has been a “notified payee underreporting” described in Section 3406(c) of the Code or (iv) the payee fails to certify under penalty of perjury that the payee is not subject to withholding under Section 3406(a)(1)(C) of the Code. Amounts withheld under the backup withholding rules may be refunded or credited against an owner’s federal income tax liability, if any, provided that the required information is timely furnished to the IRS. Certain owners (including among others, corporations and certain tax-exempt organizations) are not subject to backup withholding. The failure to comply with the backup withholding rules may result in the imposition of penalties by the IRS.

LEGAL MATTERS

Legal matters incident to the authorization, issuance and sale of the Bonds and the Notes are subject to the respective approving legal opinions of Orrick, Herrington & Sutcliffe LLP, Bond Counsel. Bond Counsel’s opinions will be in substantially the form attached hereto as Appendices D and E, respectively.

DISCLOSURE UNDERTAKINGS

Disclosure Undertaking for the Bonds

In accordance with the requirements of Rule 15c2-12, as the same may be amended or officially interpreted from time to time (the “Rule”), promulgated by the Securities and Exchange Commission (the “Commission”), the District has agreed to provide, or cause to be provided,

(1) to the Electronic Municipal Market Access (“EMMA”) system of the Municipal Securities Rulemaking Board (“MSRB”) or any other entity designated or authorized by the Commission to receive reports pursuant to the Rule, during each fiscal year in which the Bonds are outstanding, (i) certain annual financial information and operating data for the preceding fiscal year in a form generally consistent with the information contained or cross-referenced in the final Official Statement dated May 27, 2026 of the District relating to the Bonds under the headings “LITIGATION” and all of Appendix A and Appendix B by the end of the sixth month following the end of each succeeding fiscal year, commencing with the fiscal year ending June 30, 2026, and (ii) a copy of the audited financial statement, if any, (prepared in accordance with accounting principles generally accepted in the United States of America in effect at the time of the audit) for the preceding fiscal year, commencing with the fiscal year ending June 30, 2026; such audit, if any, will be so provided on or prior to the later of either the end of the sixth month of each such succeeding fiscal year or, if an audited financial statement is not available at that time, within sixty days following receipt by the District of its audited financial statement for the preceding fiscal year, but, in any event, not later than the last business day of each such succeeding fiscal year; and provided further, in the event that the audited financial statement for any fiscal year is not available by the end of the sixth month following the end of any such succeeding fiscal year, unaudited financial statements in the form provided to the State, if available, will be provided no later than said date; provided however, that provision of unaudited financial statements in any year shall be further conditioned upon a determination by the District of whether such provision is compliant with the requirements of federal securities laws including Rule 10b-5 of the Securities Exchange Act of 1934 and Rule 17(a)(2) of the Securities Act of 1933;

(2) timely notice, not in excess of ten (10) business days after the occurrence of such event, of the occurrence of any of the following events:

(i) principal and interest payment delinquencies; (ii) non-payment related defaults, if material; (iii) unscheduled draws on debt service reserves reflecting financial difficulties; (iv) unscheduled draws on credit enhancements reflecting financial difficulties; (v) substitution of credit or liquidity providers, or their failure to perform; (vi) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices of determinations with respect to the tax status of the Bonds, or other material events affecting the tax status of the Bonds; (vii) modifications to rights of Bondholders, if material; (viii) Bond calls, if

material, and tender offers; (ix) defeasances; (x) release, substitution, or sale of property securing repayment of the Bonds, if material; (xi) rating changes; (xii) bankruptcy, insolvency, receivership or similar event of the District; (xiii) the consummation of a merger, consolidation, or acquisition involving the District or the sale of all or substantially all of the assets of the District, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material; and (xiv) appointment of a successor or additional trustee or the change of name of a trustee, if material; (xv) incurrence of a “Financial Obligation” (as defined in the Rule) of the District, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation of the District, any of which affect Bond holders, if material; and (xvi) default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the District, any of which reflect financial difficulties.

Event (iii) is included pursuant to a letter for the SEC staff to the National Association of Bond Lawyers dated September 19, 1995. However, event (iii) is not applicable, since no “debt service reserves” will be established for the Bonds.

With respect to event (iv) the District does not undertake to provide any notice with respect to credit enhancement added after the primary offering of the Bonds.

With respect to event (xii) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the District in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or government authority has assumed jurisdiction over substantially all of the assets or business of the District, or if such jurisdiction has been assumed by leaving the existing governing body and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the District.

With respect to events (xv) and (xvi) above, the term “Financial Obligation” means a (a) debt obligation; (b) derivative instrument entered into in connection with, or pledged as security or a source of payment for, an existing or planned debt obligation; or (c) guarantee of (a) or (b). The term Financial Obligation shall not include municipal securities as to which a final official statement has been provided to the MSRB consistent with the Rule.

The District may provide notice of the occurrence of certain other events, in addition to those listed above, if it determines that any such other event is material with respect to the Bonds; but the District does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above; and

(3) in a timely manner, notice of a failure to provide the annual financial information and operating data and such audited financial statement by the date specified.

The District reserves the right to terminate its obligation to provide the aforescribed notices, as set forth above, if and when the District no longer remains an obligated person with respect to the Bonds within the meaning of the Rule. The District acknowledges that its undertaking pursuant to the Rule described under this heading is intended to be for the benefit of the holders of the Bonds (including holders of beneficial interest in the Bonds). The right of holders of the Bonds to enforce the provisions of the undertaking will be limited to a right to obtain specific enforcement of the District obligations under its event notices undertaking and any failure by the District to comply with the provisions of the undertaking will neither be a default with respect to the Bonds nor entitle any holder of the Bonds to recover monetary damages.

The District reserves the right to modify from time to time the specific types of information provided or the format of the presentation of such information, to the extent necessary or appropriate in the judgment of the District provided that, the District agrees that any such modification will be done in a manner consistent with the Rule.

Disclosure Undertaking for the Notes

This Official Statement is in a form “deemed final” by the District for the purposes of Securities and Exchange Commission Rule 15c2-12 (the “Rule”). At the time of the delivery of the Notes, the District will provide an executed copy of its “Undertaking to Provide Notice of Certain Material Events” (the “Undertaking”). Said Undertaking will constitute a written agreement or contract of the District for the benefit of holders of and owners of beneficial interests in the Notes, to provide, or cause to be provided, timely notice not in excess of ten (10) business days after the occurrence of any of the following events with respect to the Notes:

(i) principal and interest payment delinquencies; (ii) non-payment related defaults, if material; (iii) unscheduled draws on debt service reserves reflecting financial difficulties; (iv) unscheduled draws on credit enhancements reflecting financial difficulties; (v) substitution of credit or liquidity providers, or their failure to perform; (vi) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices of determinations with respect to the tax status of the Notes, or other material events affecting the tax status of the Notes; (vii) modifications to rights of Noteholders, if material; (viii) Note calls, if material, and tender offers; (ix) defeasances; (x) release, substitution, or sale of property securing repayment of the Notes, if material; (xi) rating changes; (xii) bankruptcy, insolvency, receivership or similar event of the District; (xiii) the consummation of a merger, consolidation, or acquisition involving the District or the sale of all or substantially all of the assets of the District, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material; and (xiv) appointment of a successor or additional trustee or the change of name of a trustee, if material; (xv) incurrence of a “Financial Obligation” (as defined in the Rule) of the District, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation of the District, any of which affect Noteholders, if material; and (xvi) default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the District, any of which reflect financial difficulties.

Event (iii) is included pursuant to a letter for the SEC staff to the National Association of Bond Lawyers dated September 19, 1995. However, event (iii) is not applicable, since no “debt service reserves” will be established for the Notes.

With respect to event (iv) the District does not undertake to provide any notice with respect to credit enhancement added after the primary offering of the Notes.

With respect to event (xii) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the District in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or government authority has assumed jurisdiction over substantially all of the assets or business of the District, or if such jurisdiction has been assumed by leaving the existing governing body and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the District.

With respect to events (xv) and (xvi) above, the term “Financial Obligation” means a (a) debt obligation; (b) derivative instrument entered into in connection with, or pledged as security or a source of payment for, an existing or planned debt obligation; or (c) guarantee of (a) or (b). The term Financial Obligation shall not include municipal securities as to which a final official statement has been provided to the MSRB consistent with the Rule.

The District may provide notice of the occurrence of certain other events, in addition to those listed above, if it determines that any such other event is material with respect to the Notes; but the District does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above.

The District’s Undertaking shall remain in full force and effect until such time as the principal of, redemption premiums, if any, and interest on the Notes shall have been paid in full. The sole and exclusive remedy for breach or default under the Undertaking is an action to compel specific performance of the undertakings of the District, and no person or entity, including a holder of the Notes, shall be entitled to recover monetary damages thereunder under any circumstances. Any failure by the District to comply with the Undertaking will not constitute a default with respect to the Notes.

The District reserves the right to amend or modify the Undertaking under certain circumstances set forth therein; provided that, any such amendment or modification will be done in consultation with nationally recognized bond counsel in a manner consistent with Rule 15c2-12 as then in effect.

Compliance History

On August 21, 2025, the District filed a material event notice on EMMA for the failure to timely file the incurrence of a financial obligation following the June 12, 2025 issuance of the District’s \$1,325,000 Bond Anticipation Notes, 2025 Series A.

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC, Great Neck, New York, (the “Municipal Advisor”) is an independent municipal advisor registered with the United States Securities and Exchange Commission and the Municipal Securities Rulemaking Board. The Municipal Advisor has served as the independent financial advisor to the District in connection with this transaction.

In preparing the Official Statement, the Municipal Advisor has relied upon governmental officials, and other sources, who have access to relevant data to provide accurate information for the Official Statement. The Municipal Advisor has not been engaged, nor has it undertaken, to independently verify the accuracy of such information. The Municipal Advisor is not a public accounting firm and has not been engaged by the District to compile, review, examine or audit any information in the Official Statement in accordance with accounting standards. The Municipal Advisor is not a law firm and does not provide legal advice with respect to this or any debt offerings of the District. The Municipal Advisor is an independent advisory firm and is not engaged in the business of underwriting, trading or distributing municipal securities or other public securities and therefore will not participate in the underwriting of the Bonds or the Notes.

RATINGS

The District has applied to Moody’s Investors Service, Inc. (“Moody’s”) for a rating on the Bonds and the Notes. Such application is pending at this time.

The District’s underlying credit rating from Moody’s is “Aa3”.

With respect to the Moody’s rating applicable to uninsured debt, such rating reflects only the views of Moody’s and any desired explanation of the significance of such rating should be obtained from Moody’s, at the following address: Moody’s Investors Service, Inc., 7 World Trade Center at 250 Greenwich Street, New York, New York 10007. There can be no assurance that such rating will continue for any specified period of time or that such rating will not be revised or withdrawn, if in the judgment of Moody’s circumstances so warrant. Any such change or withdrawal of such rating may have an adverse effect on the market price of the Bonds and the Notes or the availability of a secondary market for the Bonds and the Notes.

ADDITIONAL INFORMATION

Statements in the Official Statement, and the documents included by specific reference, that are not historical facts are “forward-looking statements”, within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended, and as defined in the Private Securities Litigation Reform Act of 1995, which involve a number of risks and uncertainties, and which are based on the District management’s beliefs as well as assumptions made by, and information currently available to, the District management and staff. Because the statements are based on expectations about future events and economic performance and are not statements of fact, actual results may differ materially from those projected. Important factors that could cause future results to differ include legislative and regulatory changes, changes in the economy, and other factors discussed in this and other documents that the District files with the repositories. When used in District documents or oral presentation, the words “anticipate”, “believe”, “intend”, “plan”, “foresee”, “likely”, estimate”, “expect”, “objective”, “projection”, “forecast”, “goal”, “will, or “should”, or similar words or phrases are intended to identify forward-looking statements.

To the extent any statements made in this Official Statement involve matters of opinion or estimates, whether or not expressly stated, they are set forth as such and not as representations of fact, and no representation is made that any of the statements will be realized. Neither this Official Statement nor any statement which may have been made verbally or in writing is to be construed as a contract with the holder of the Bonds and the Notes.

Orrick, Herrington & Sutcliffe LLP, New York, New York, bond counsel to the District, expresses no opinion as to the accuracy or completeness of information in any documents prepared by or on behalf of the District for use in connection with the offer and sale of the Bonds and the Notes, including but not limited to, the financial or statistical information in this Official Statement.

References herein to the Constitution of the State and various State and federal laws are only brief outlines of certain provisions thereof and do not purport to summarize or describe all of such provisions.

Concurrently with the delivery of the Notes, the District will furnish a certificate to the effect that as of the date of the Official Statement, the Official Statement did not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements herein, in the light of the circumstances under which they were made, not misleading, subject to limitation as to information in the Official Statement obtained from sources other than the District, as to which no representation can be made.

The Official Statement is submitted only in connection with the sale of the Bonds and the Notes by the District and may not be reproduced or used in whole or in part for any other purpose.

The District hereby disclaims any obligation to update developments of the various risk factors or to announce publicly any revision to any of the forward-looking statements contained herein or to make corrections to reflect future events or developments except to the extent required by Rule 15c2-12 promulgated by the Securities and Exchange Commission.

Capital Markets Advisors, LLC may place a copy of this Official Statement on its website at www.capmark.org. Unless this Official Statement specifically indicates otherwise, no statement on such website is included by specific reference or constitutes a part of this Official Statement. Capital Markets Advisors, LLC has prepared such website information for convenience, but no decisions should be made in reliance upon that information. Typographical or other errors may have occurred in converting original sourced documents to digital format, and neither the District nor Capital Markets Advisors, LLC assumes any liability or responsibility for errors or omissions on such website. Further, Capital Markets Advisors, LLC and the District disclaims any duty or obligation either to update or to maintain the information or any responsibility or liability for any damages caused by viruses in the electronic files on the website. Capital Markets Advisors, LLC and the District also assumes no liability or responsibility for any errors or omissions or for any updates to dated website information.

Additional information may be obtained upon request from Capital Markets Advisors, LLC at (516) 274-4502 or from the District's School Business Manager at (845) 269-9254 ext. 112.

HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN

By: _____
Dr. Peggy Clements
President of the Board of Education

DATED: May __, 2026

APPENDIX A

THE DISTRICT

THE DISTRICT

General Information

The District is located primarily within the County of Putnam; however, a small portion of the District is located in Dutchess County in the Town of Fishkill. The District lies approximately 60 miles north of New York City and covers an area of approximately 32 square miles. The major component of the District is the Town of Philipstown (the “Town”) (comprising approximately 97% of the property valuation of the District and includes the Villages of Cold Spring and Nelsonville). The towns of Putnam Valley (2%) and Fishkill (1%) make up the remaining portion of the District.

Residents of the District receive their basic municipal services from the towns making up the District. The Counties are responsible for providing social and certain health related programs.

The District is primarily residential in nature. Residents are employed locally as well as in New York City or the Metropolitan New York Area. Wealth levels for District residents exceed State norms. (See “*Economic and Demographic Information*,” herein).

District Organization

The District is an independent entity governed by an elected board of education comprised of five members. District operations are subject to the provisions of the State Education Law affecting school districts and other statutes applicable to the District.

Members of the Board of Education of the District (the “Board of Education”) are chosen on a rotating basis by qualified voters at the annual election of the District (held the third Tuesday in May). The term of office for each board member is 3 years and the number of terms that may be served is unrestricted. A president is selected by the Board of Education from its members and also serves as the chief fiscal officer of the District. The Board of Education is vested with various powers and duties as set forth in the Education Law. Among these are the adoption of annual budgets (subject to voter approval), the levy of real property taxes for the support of education, the appointment of such employees as may be necessary, and other such duties reasonably required to fulfill the responsibilities provided by law.

The Board of Education appoints the superintendent of schools who serves at the pleasure of the Board of Education. Such superintendent is the chief executive officer of the District and is an ex-officio member of the Board of Education with the right to speak on all matters before the Board of Education but not to vote. It is the responsibility of the superintendent to enforce all provisions of law and all rules and regulations relating to the management of the schools and other educational, social and recreational activities under the direction of the Board of Education. Certain of the financial functions of the District are the responsibility of the School Business Manager.

Financial Organization

Pursuant to the Local Finance Law, the President of the Board of Education is the chief fiscal officer of the District. However, certain of the financial functions of the District are the responsibility of the Superintendent of Schools, the Business Manager and the District Clerk.

Financial Statements and Accounting Procedures

The financial accounts of the District are maintained in accordance with the New York State Uniform System of Accounting for School Districts. Such accounts are audited annually by independent auditors and are available for public inspection upon request.

Budgetary Procedure

Pursuant to the Education Law, the District's Board of Education generally prepares or causes to be prepared a budget for the ensuing fiscal year. The budget, effective for fiscal years beginning on or after July 1, 1998, must consist of three parts: program, administration and capital. During November and December the tentative budget is developed and refined in consultation with school administrators. At the March and April meetings of the Board of Education, the proposed budget is discussed and further refined. The tentative budget is adopted by the Board at its April meeting and submitted to referendum at the Annual Meeting held on the third Tuesday of May. Residents of the District who are qualified to vote may participate in the referendum. Prior to the Annual Meeting a public hearing on the proposed budget is held.

The District's budget is subject to the provisions of Chapter 97 of the Laws of 2011, which imposes a limitation on the amount of real property taxes that a school district may levy, and by law is submitted to voter referendum on the third Tuesday of May each year. See “*Tax Levy Limit Law*,” herein. For a further discussion regarding the budget vote, revote, contingency budget and the tax cap.

Qualified voters of the District will vote on the Tentative Budget for the 2026-2027 fiscal year on May 19, 2026. On May 20, 2025, a majority of the voters of the District approved the budget for the 2025-2026 fiscal year. Summaries of the District’s Adopted Budgets for the fiscal years 2024-2025 and 2025-2026, as well as the Tentative Budget for 2026-2027, may be found in Appendix B, hereto.

School Enrollment Trends

School enrollment history and projections are outlined below.

| <u>Years Ended June 30:</u> | <u>Enrollment History</u> | <u>Years Ending June 30:</u> | <u>Enrollment Projections*</u> |
|-----------------------------|---------------------------|------------------------------|--------------------------------|
| 2022 | 803 | 2027 | 755 |
| 2023 | 785 | 2028 | 734 |
| 2024 | 774 | 2029 | 724 |
| 2025 | 763 | 2030 | 725 |
| 2026 | 766 | 2031 | 717 |

District Facilities

The District operates two school buildings, statistics relating to each are shown below.

| <u>Name</u> | <u>Capacity</u> | <u>Year of Original Construction Or Addition</u> | <u>Grades</u> |
|---------------------------|-----------------|--|---------------|
| The Haldane School | 750 | 1935, 1962, 1967, 1980 | K-12 |
| Haldane Junior High Annex | 75 | 1925 | 7-8 |

Employees

The District provides services through approximately 185 union and non-union employees. Union employees are represented by the following units of organized labor.

| <u>No. of Employees</u> | <u>Union</u> | <u>Expiration Date</u> |
|-------------------------|--------------|------------------------|
| Haldane Faculty Assoc. | 101 | 6/30/27 |
| CSEA | 69 | 6/30/28 |
| Haldane Administrators | 6 | 6/30/29 |

Employee Benefits

New York State Certified employees (teachers and administrators) are members of the New York State Teachers Retirement System (“TRS”). Payments to the TRS are generally deducted from State aid payments. All non-NYS certified/civil service employees of the District eligible for pension or retirement benefits under the Retirement and Social Security Law of the State of New York are members of the New York State and Local Employee's Retirement System (“ERS”). Both the TRS and ERS are non-contributory with respect to members hired prior to July 1, 1976. Other than as discussed below, all members of the respective systems hired on or after July 1, 1976 with less than 10 year’s full-time service contribute 3% (ERS) or 3.5% (TRS) of their gross annual salary toward the cost of retirement programs.

On December 10, 2009 a new Tier V was signed into law. The law is effective for new ERS and TRS employees hired after January 1, 2010 and on or before April 1, 2012. Tier V ERS employees will contribute 3% of their salaries and TRS employees will contribute 3.5% of their salaries. There is no provision for these contributions to cease after a certain period of service.

On March 16, 2012, Governor Cuomo signed into law Chapter 18 of the Laws of 2012, which legislation provides for a new Tier VI for employees hired on or after April 1, 2012. The new pension tier has progressive contribution rates between 3% and 6% with no provision for these contributions to cease after a certain period of service; it increases the retirement age for new employees from 62 to 63 and includes provisions allowing early retirement with penalties. Under Tier VI, the pension multiplier will be 1.75% for the first 20 years of service and 2% thereafter; vesting will occur after 10 years; the time period for calculation of final average salary is increased from three years to five years; and the amount of overtime to be used to determine an employee’s pension is capped at \$15,000, indexed for inflation, for

civilian and non-uniform employees and at 15% of base pay for uniformed employees outside of New York City. It also includes a voluntary, portable, defined contribution plan option for new non-union employees with salaries of \$75,000 or more.

Pension reform legislation enacted in 2003 and 2004 changed the cycle of ERS billing to match budget cycles of the District. The reform legislation also required the District to make a minimum contribution of 4.5% of payroll every year, including years in which the investment performance of the fund would otherwise make a lower contribution possible.

Due to prior poor performance of the investment portfolio of TRS and ERS, the employer contribution rates for required pension contributions to the TRS and ERS in 2011 and certain subsequent years have increased. To help mitigate the impact of such increases, legislation was enacted to permit school districts to amortize a portion of the contributions to the ERS only. Under such legislation, school districts that choose to amortize will be required to set aside and reserve funds with the ERS for certain future rate increases. The District has not and does not reasonably expect to amortize such contributions in the immediate future.

In Spring 2013, the State and TRS approved a Stable Contribution Option (“SCO”) that gives school districts the ability to better manage the spikes in Actuarially Required Contribution rates (“ARCs”). ERS followed suit and modified its existing SCO. Each plan allows school districts to pay the SCO amount in lieu of the ARC amount, which is higher, and defer the difference in payment amounts as described below.

The TRS SCO deferral plan is available to school districts for a total of seven years. Under the TRS SCO plan, payment of the deferred amount will commence in year six of the program (2018-19) and continue for five years. School districts can elect to no longer participate in the plan at any time, resume paying the ARC and begin repayment of deferred amounts over five years. Under the ERS SCO, payment of deferred amounts begins the year immediately following the deferral and the repayment period is 12 years. Once made, the election to participate in the ERS SCO is permanent. However, the school districts can choose not to defer payment in any given year. In both plans, interest on the deferred amounts is based on the yield of 10-year U.S. Treasury securities plus 1%.

The primary benefit of participation in the SCO plans is the elimination of the uncertainty in the volatility of future pension contribution ARCs in the near term, thereby providing school districts with significant assistance in its ability to create a stable and reliable fiscal plan. The District has not and does not reasonably expect to participate in the ERS or TRS SCO program.

The State’s 2019-2020 Enacted Budget, which was signed into law as Chapter 59 of the Laws of 2019, includes a provision that will allow school districts in the State to establish a reserve fund for the purpose of funding the cost of TRS contributions, as a sub-fund of retirement contribution reserve funds presently authorized for amounts payable to the ERS by a school district. School districts will be permitted to pay into such reserve fund during any particular fiscal year, an amount not to exceed two percent of the total compensation or salaries of all district-employed teachers who are members of the TRS paid during the immediately preceding fiscal year; provided that the balance of such fund may not exceed ten percent of the total compensation or salaries of all district-employed teachers who are members of the TRS paid during the immediately preceding fiscal year. The District established such a fund in the 2018-2019 fiscal year.

Retirement Billing Procedures

TRS. TRS contributions are paid as a reduction in State aid payments due September 15, October 15 and November 15 of the succeeding fiscal year. Any deficiency or excess in TRS contributions are settled on a current basis in the month of January.

ERS. The District’s contributions to ERS are due on or before February 1. Such contributions are based on salary estimates for the State fiscal year ending on March 31 of the next calendar year.

(The remainder of this page has been intentionally left blank.)

The amounts contributed to TRS and ERS for the last five fiscal years and the amount estimated for the current and upcoming fiscal years are as follows:

| Fiscal Year Ended June 30 | TRS | ERS |
|--|-------------|-----------|
| 2022 | \$1,007,380 | \$454,176 |
| 2023 | 1,187,776 | 322,364 |
| 2024 | 1,109,938 | 342,901 |
| 2025 | 1,214,332 | 406,400 |
| 2026 (Adopted Budget) | 1,130,000 | 475,000 |
| 2027 (Tentative Budget) ⁽¹⁾ | 1,200,000 | 475,000 |

(1) To be voted on by qualified voters of the District on May 19, 2026.

Other Post Employment Benefits

The District implemented GASB Statement No. 75 (“GASB 75”) of the Governmental Accounting Standards Board (“GASB”), which replaces GASB Statement No. 45 as of fiscal year ended June 30, 2018. GASB 75 requires state and local governments to account for and report their costs associated with post-retirement healthcare benefits and other non-pension benefits, known as other post-employment benefits (“OPEB”). GASB 75 generally requires that employers account for and report the annual cost of OPEB and the outstanding obligations and commitments related to OPEB similarly to GASB Statement No. 68 reporting requirements for pensions.

GASB 75 requires state and local governments to measure a defined benefit OPEB plan as the portion of the present value of projected benefit payments to be provided to current active and inactive employees, attributable to past periods of service in order to calculate the total OPEB liability. Total OPEB liability generally is required to be determined through an actuarial valuation using a measurement date that is no earlier than the end of the employer’s prior fiscal year and no later than the end of the employer’s current fiscal year.

GASB 75 requires that most changes in the OPEB liability be included in OPEB expense in the period of the changes. Based on the results of an actuarial valuation, certain changes in the OPEB liability are required to be included in OPEB expense over current and future years.

The District’s total OPEB liability as of June 30, 2025 was \$49,950,663 using a discount rate of 4.76% and actuarial assumptions and other inputs as described in the District’s June 30, 2025 audited financial statements.

Should the District be required to fund the total OPEB liability, it could have a material adverse impact upon the District’s finances and could force the District to reduce services, raise taxes or both. At the present time, however, there is no current or planned requirement for the District to partially fund its OPEB liability.

At this time, New York State has not developed guidelines for the creation and use of irrevocable trusts for the funding of OPEB. The District has continued funding this expenditure on a pay-as-you-go basis.

Legislation has been introduced from time to time to create an optional investment pool to help the State and local governments fund retiree health insurance and OPEB. Such proposed legislation would generally authorize the creation of irrevocable OPEB trusts so that the State and its local governments can help fund their OPEB liabilities, establish an OPEB investment fund in the sole custody of the State Comptroller for the investment of OPEB assets of the State and participating eligible local governments, designate the president of the Civil Service Commission as the trustee of the State’s OPEB trust and the governing boards as trustee for local governments and allow school districts to transfer certain excess reserve balances to an OPEB trust once it is established. Under the proposals, there would be no limits on how much a local government can deposit into the trust. The District cannot predict whether such legislation will be enacted into law in the foreseeable future.

Investment Policy

Pursuant to Section 39 of the State's General Municipal Law, the District has an investment policy applicable to the investment of all moneys and financial resources of the District. The responsibility for the investment program has been delegated by the Board of Education to the Deputy Superintendent for who was required to establish written operating procedures consistent with the District's investment policy guidelines. According to the investment policy of the District, all investments must conform to the applicable requirements of law and provide for: the safety of the principal; sufficient liquidity; and a reasonable rate of return.

Authorized Investments. The District has designated two banks or trust companies which are located and authorized to conduct business in the State to receive deposits of money. The District is permitted to invest in special time deposits or certificates of deposit.

In addition to bank deposits, the District is permitted to invest moneys in direct obligations of the United States of America, obligations guaranteed by agencies of the United States where the payment of principal and interest are further guaranteed by the United States of America and obligations of the State. Other eligible investments for the District include: revenue and tax anticipation notes issued by any municipality, school district or district corporation other than the District (investment subject to approval of the State Comptroller); obligations of certain public authorities or agencies; obligations issued pursuant to Section 109(b) of the General Municipal Law (certificates of participation) and certain obligations of the District but only with respect to moneys of a reserve fund established pursuant to Section 6 of the General Municipal Law. The District may also utilize repurchase agreements to the extent such agreements are based upon direct or guaranteed obligations of the United States of America. Repurchase agreements are subject to the following restrictions, among others: all repurchase agreements are subject to a master repurchase agreement; trading partners are limited to banks or trust companies authorized to conduct business in the State or primary reporting dealers as designated by the Federal Reserve Bank of New York; securities may not be substituted; and the custodian for the repurchase security must be a party other than the trading partner. All purchased obligations, unless registered or inscribed in the name of the District, must be purchased through, delivered to and held in the custody of a bank or trust company located and authorized to conduct business in the State.

Collateral Requirements. All District deposits in excess of the applicable insurance coverage provide by the Federal Deposit Insurance Act must be secured in accordance with the provisions of and subject to the limitations of Section 10 of the General Municipal Law of the State. Such collateral must consist of the “eligible securities,” “eligible surety bonds” or “eligible letter of credit” as described in the law.

Eligible securities pledged to secure deposits must be held by the depository or third party bank or trust company pursuant to written security and custodial agreements. The District's security agreements provide that the aggregate market value of pledged securities must equal or exceed the principal amount of deposit, the agreed upon interest, if any, and any costs or expenses arising from the collection such deposits in the event of a default. Securities not registered or inscribed in the name of the District must be delivered, in a form suitable for transfer or with an assignment in blank, to the District or its designated custodial bank. The custodial agreements used by the District provide that pledged securities must be kept separate and apart from the general assets of the custodian and will not, under any circumstances, be commingled with or become part of the backing for any other deposit or liability. The custodial agreement must also provide that the custodian shall confirm the receipt, substitution or release of the collateral, the frequency of revaluation of eligible securities and the substitution of collateral when a change in the rating of a security may cause ineligibility.

An eligible irrevocable letter of credit may be issued, in favor of the District, by a qualified bank other than the depository bank. Such letters may have a term not to exceed 90 days and must have an aggregate value equal to 140% of the deposit obligations and the agreed upon interest. Qualified banks include those with commercial paper or other unsecured or short-term debt ratings within one of the three highest categories assigned by at least one nationally recognized statistical rating organization or a bank that is in compliance with applicable Federal minimum risk-based capital requirements.

An eligible surety bond must be underwritten by an insurance company authorized to do business in the State which has claims paying ability rated in the highest rating category for claims paying ability by at least two nationally recognized statistical rating organizations. The surety bond must be payable to the District in an amount equal to 100% of the aggregate deposits and the agreed interest thereon.

FINANCIAL FACTORS

District finances are operated primarily through its General Fund. All taxes and most other revenues are paid into this fund and all current operating expenditures are made from it. A Statement of Revenues and Expenditures for the five-year period ending June 30, 2025 is contained in Appendix B. As reflected in Appendix B, the District derives the bulk of its annual revenues from a tax on real property. Capital improvements are generally financed by the issuance of bonds, bond anticipation notes and the use of funds reserved for capital improvements.

COVID-19 Stimulus and Uses

On March 11, 2021, the federal government signed into law The American Rescue Plan Act (“ARPA”) that addressed issues related to the COVID-19 pandemic. The ARP Act also created new programs to address pandemic-related crisis and fund recovery efforts. It provided significant funding to local governments and school districts in NYS.

The District was eligible to receive approximately \$33,514 in Coronavirus Aid, Relief, and Economic Security (“CARES”) Act funds that offset COVID-19 related expenditures due to the pandemic. The District was allocated approximately \$281,014 in additional Federal stimulus funding between the ARPA and the Coronavirus Response and Relief Supplemental Appropriations (“CRRSA”) Act to address learning loss, mental health need and school building related expenditures to upgrade technology and support all students' academic needs. As of the date of this Official Statement, all funding has been allocated and expended by the District.

Real Property Taxes

The District derives a major portion of its revenues from a tax on real property. On June 24, 2011, Chapter 97 of the Laws of 2011 was enacted, which imposes a tax levy limitation upon the municipalities, school districts and fire districts in the State, including the District. (See “*Tax Levy Limit Law*,” herein.)

The following table sets forth total general fund revenues and real property tax revenues during the last five audited fiscal years and the amounts budgeted for the current and upcoming fiscal years.

| <u>Property Taxes</u> | | | |
|--|-------------------------------------|--|--|
| <u>Fiscal Year</u> | <u>Total Revenues⁽¹⁾</u> | <u>Real Property Taxes⁽²⁾</u> | <u>Real Property Taxes to Revenues</u> |
| 2021 | \$24,870,527 | \$20,571,668 | 82.7% |
| 2022 | 25,114,733 | 20,987,058 | 83.6 |
| 2023 | 26,474,059 | 21,754,653 | 82.2 |
| 2024 | 28,054,255 | 22,177,783 | 79.1 |
| 2025 | 28,735,876 | 22,774,628 | 79.3 |
| 2026 (Adopted Budget) | 29,259,390 | 23,442,078 | 80.1 |
| 2027 (Tentative Budget) ⁽³⁾ | 30,997,876 | 24,737,361 | 79.8 |

- (1) General Fund only. Exclusive of Appropriated Fund Balance and Other Financing Sources and Uses.
- (2) Inclusive of Other Tax Items, which represents STAR tax payments made to the District by the State. (See “*STAR - School Tax Exemption*,” herein).
- (3) To be voted on by qualified voters of the District on May 19, 2026.

Source: Audited Financial Statements, Adopted Budget, and Tentative Budget of the District. This summary is not audited.

State Aid

The District receives appropriations from the State of State aid for operating, building and other purposes at various times throughout its fiscal year, pursuant to formulas and payment schedules set forth by statute. While the State has a constitutional duty to maintain and support a system of free common schools that provides a “sound basic education” to children of the State, there can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the school districts can be paid only if the State has such monies available for such payment.

(The remainder of this page has been intentionally left blank.)

The following table sets forth total general fund revenues and State aid revenues during the last five fiscal years and the amounts budgeted for the current and upcoming fiscal years.

State Aid

| <u>Fiscal Year Ended June 30:</u> | <u>General Fund Revenues⁽¹⁾</u> | <u>State Aid</u> | <u>State Aid to Revenue (%)</u> |
|--|--|------------------|-------------------------------------|
| 2021 | \$24,870,527 | \$3,074,045 | 12.4% |
| 2022 | 25,114,733 | 3,222,092 | 12.8 |
| 2023 | 26,474,059 | 3,596,088 | 13.6 |
| 2024 | 28,054,255 | 4,310,218 | 15.4 |
| 2025 | 28,735,876 | 4,423,338 | 15.4 |
| 2026 (Adopted Budget) | 29,259,390 | 4,391,012 | 15.0 |
| 2027 (Tentative Budget) ⁽²⁾ | 30,997,876 | 4,507,965 | 14.5 |

(1) General Fund only. Exclusive of Appropriated Fund Balance and Other Financing Sources and Uses.

(2) To be voted on by qualified voters of the District on May 19, 2026.

Source: Audited Financial Statements, Adopted Budget, and Tentative Budget of the District. This summary is not audited.

In addition to the amount of State Aid budgeted annually by the District, the State makes payments of STAR aid representing tax savings provided by school districts to their taxpayers under the STAR Program (See “STAR – School Tax Exemption” herein).

The State’s 2021-22 Enacted Budget and the State’s 2022-23 Enacted Budget included significant amounts of federal funding. The State receives a substantial amount of federal aid for health care, education, transportation and other governmental purposes, as well as federal funding to respond to, and recover from, severe weather events and other disasters. Many of the policies that drive federal aid may be subject to change under the federal administration and Congress. Current federal aid projections, and the assumptions on which they rely, are subject to revision. Reductions in federal funding levels could have an a materially adverse impact on the State budget. To date, school districts have received significant funding because of the COVID-19 pandemic from federal stimulus packages and reinstatement of State Foundation Aid, however, the additional federal funding ceased after the 2023-24 fiscal year. As part of the 2025–26 Enacted State Budget, the Governor and Legislature made targeted adjustments to the Foundation Aid formula. While the formula itself remains largely intact, the budget includes a hold harmless provision ensuring that no district receives less Foundation Aid than in the prior year. Additionally, all districts are guaranteed at least a 2% year-over-year increase in Foundation Aid. The enacted budget also includes formula modifications intended to provide enhanced support for high-need and disadvantaged school districts.

The amount of State aid to school districts can vary from year to year and is dependent in part upon the financial condition of the State. During the 2011 to 2019 fiscal years of the State, State aid to school districts was paid in a timely manner; however, during the State’s 2010 and 2020 fiscal years, State budgetary restrictions resulted in delayed payments of State aid to school districts in the State. In addition, the availability of State aid and the timeliness of payment of State aid to school districts could be affected by a delay in the adoption of the State budget, which is due at the start of the State’s fiscal year of April 1. With the exception of the State’s current fiscal year 2025-26 Enacted Budget (which was adopted on May 9, 2025, thirty-eight (38) days after the April 1 deadline), the State’s fiscal year 2024-25 Enacted Budget (which was adopted on April 22, 2024, twenty-one (21) days after the April 1 deadline) and the State’s fiscal year 2023-24 Enacted Budget (which was adopted on May 2, 2023, thirty-one (31) days after the April 1 deadline), the State’s budget has been adopted by April 1 or shortly thereafter for over ten (10) years. No assurance can be given that the State will not experience delays in the adoption of the budget in future fiscal years. Significant delays in the adoption of the State budget could result in delayed payment of State aid to school districts in the State which could adversely affect the financial condition of school districts in the State.

In addition to the potential fiscal impact of policies that may be proposed and adopted by the federal administration and Congress, the State budget may be adversely affected by other actions taken by the federal government, including audits, disallowances, and changes to federal participation rates or other Medicaid rules.

There can be no assurance that the State’s financial position will not change materially and adversely from current projections. If this were to occur, the State would be required to take additional gap-closing actions. Such actions may include, but are not limited to: reductions in State agency operations; delays or reductions in payments to local governments or other recipients of State aid including school districts in the State. Reductions in the payment of State aid could adversely affect the financial condition of school districts in the State, including the District.

Should the District fail to receive State aid expected from the State in the amounts and at the times expected, occasioned

by a delay in the payment of such monies or by a mid-year reduction in State aid, the District is authorized by the Local Finance Law to provide operating funds by borrowing in anticipation of the receipt of uncollected State aid.

Events Affecting New York School Districts

School district fiscal year (2021-2022): For the 2021-2022 school year, the State's Enacted budget provided \$29.5 billion in State funding to school districts for the 2021-2022 school year through School Aid, the highest level of State aid ever, supporting the operational costs of school districts that educate 2.5 million students statewide. This investment represented an increase of 11.3% (\$3.0 billion) compared to the 2020-2021 school year, including a \$1.4 billion (7.6%) Foundation Aid increase. The Enacted budget allocated \$13 billion of federal Elementary and Secondary School Emergency Relief and Governor's Emergency Education Relief funds to public schools. This funding, available for use over multiple years, helped schools safely reopen for in-person instruction, address learning loss, and respond to students' academic, social, and emotional needs due to the disruptions of the COVID-19 pandemic. The Budget allocated \$629 million of these funds to school districts as targeted grants to support efforts to address learning loss through activities such as summer enrichment and comprehensive after-school programs. In addition, the Budget used \$105 million of federal funds to expand access to full-day prekindergarten programs for four-year-old children in school districts statewide in the 2021-2022 school year.

School district fiscal year (2022-2023): For the 2022-2023 school year, the State's Enacted provided \$31.3 billion in State funding to school districts for the 2022-23 school year the highest level of State aid ever. This represented a year-to-year funding increase of \$2.1 billion or 7.07%. and included \$21.4 billion of Foundation Aid which increased 8.1% from 2021-22. The 2022-23 school year increase in Foundation Aid primarily reflected the second year of the three-year phase-in of full funding of the current Foundation Aid formula. The Enacted Budget also increased the State's annual investment in prekindergarten to \$1.1 billion, an increase of \$125 million, or 13%. The Budget also included a total of \$100 million of matching funds over two years to be provided to school districts and BOCES with the highest needs to address student wellbeing and learning loss in response to the trauma brought about by the COVID-19 pandemic. This included support for extended school day or school year programs, afterschool programs, mental health professionals and other locally determined initiatives.

School district fiscal year (2023-2024): For the 2023-2024 school year, the Enacted Budget provided \$34.5 billion in State funding to school districts for the 2023-24 school year the highest level of State aid ever. This represented a year-to-year funding increase of \$3.1 billion or 10.00%. and includes \$24.1 billion of Foundation Aid which increased 12.8% from 2022-23. The 2022-23 school year increase in Foundation Aid is to complete the three-year phase-in of full funding of the current Foundation Aid formula. The Enacted Budget also increased the State's annual investment in pre-kindergarten to \$1.2 billion, an increase of \$125 million, or 9.09%. The Budget also included a total of \$20 million in grant funding to support the establishment of new early college high school programs.

School district fiscal year (2024-2025): For the 2024-2025 school year, the Enacted Budget provided \$35.9 billion in State funding to school districts for the 2024-25 school year, the highest level of State aid ever. This represented an increase of \$1.3 billion compared to the 2023-24 school year and included a \$934 million or 3.89 percent Foundation Aid increase. The State's 2024-25 Enacted Budget maintains the "save harmless" provision, which ensures a school district receives at least the same amount of Foundation Aid as it received in the prior year. The State's 2024-25 Enacted Budget also authorized a comprehensive study by the Rockefeller Institute and the State Department of Education to develop a modernized school funding formula.

School district fiscal year (2025-2026): For the 2025-2026 school year, the Enacted Budget provided \$37.6 billion in State funding to school districts, the highest level of State aid ever. This represented an increase of \$1.7 billion or 4.9 percent compared to the 2024-25 school year and included a \$1.4 billion, or 5.9 percent, Foundation Aid increase. Although recommended to be phased-out in the previously mentioned report done by the Rockefeller Institute, the State's 2025-26 Enacted Budget maintains the "save harmless" provision, which ensures a school district receives at least the same amount of Foundation Aid as it received in the prior year. The State's 2025-26 Enacted Budget includes a 2% minimum increase in Foundation Aid to all school districts and makes a number of alterations to the Foundation Aid formula designed to reflect low-income student populations and provide additional aid to low-wealth school districts.

School district fiscal year (2026-2027): For the 2026-2027 school year, the proposed Executive Budget provides \$40.5 billion in State funding to school districts, the highest level of State aid ever. This represents an increase of \$2.9 billion or 9.3 percent compared to the 2025-26 school year and includes a \$780 million, or 2.9 percent, Foundation Aid increase. Although recommended to be phased-out in the previously mentioned report done by the Rockefeller Institute, the State's 2026-27 Executive Budget maintains the "save harmless" provision, which ensures a school district receives at least the same amount of Foundation Aid as it received in the prior year. The State's 2026-27 Executive Budget includes a 1% minimum increase in Foundation Aid to all school districts and makes a number of alterations to the Foundation Aid formula designed to reflect low-income student populations and provide additional aid to low-wealth school districts.

Provisions in the State’s 2026-27 proposed Executive Budget grant the State Budget Director the authority to withhold all or some of the amounts appropriated therein, including amounts that are to be paid on specific dates prescribed in law or regulation (such as State aid) if, on a cash basis of accounting, a “general fund imbalance” has or is expected to occur in fiscal year 2026-27. Specifically, the State’s 2026-27 Executive Budget provides that a “general fund imbalance” has occurred, and the State Budget Director’s powers are activated, if any State fiscal year 2026-27 quarterly financial plan update required by Subdivision 4 of Section 23 of the New York State Finance Law reflects, or if at any point during the final quarter of State fiscal year 2026-27 the State Budget Director projects, that estimated general fund receipts and/or estimated general fund disbursements have or will vary from the estimates included in the State’s 2026-27 Executive Budget financial plan required by sections 22 and 23 of the New York State Finance Law results in a cumulative budget imbalance of \$2 billion or more. Any significant reductions or delays in the payment of State aid could adversely affect the financial condition of school districts in the State.

The District cannot predict at this time whether there will be any reductions in and/or delays in the receipt of State aid during the remainder of the current fiscal year or in future fiscal years. However, the District believes that it would mitigate the impact of any delays or the reduction in State aid by reducing expenditures, increasing revenues, appropriating other available funds on hand, and/or by any combination of the foregoing. (See also “RISK FACTORS” herein).

Other Revenues

In addition to property taxes and State Aid, the District receives other revenues from miscellaneous sources as shown in Appendix B.

Independent Audits

The District retained the firm of Bonadio & Co, LLP., Certified Public Accountants, to audit its financial statements for the fiscal year ended June 30, 2025. Appendix B, attached hereto, presents excerpts from the District’s most recent audited reports covering the last five fiscal years.

In addition, the District is subject to audit by the State Comptroller to review compliance with legal requirements and the rules and regulations established by the State (see “*The State Comptroller’s Fiscal Stress Monitoring System*” herein.)

The State Comptroller’s Fiscal Stress Monitoring System

The New York State Comptroller has reported that New York State’s school districts and municipalities are facing significant fiscal challenges. As a result, the Office of the State Comptroller (“OSC”) has developed a Fiscal Stress Monitoring System (“FSMS”) to provide independent, objectively measured and quantifiable information to school district and municipal officials, taxpayers and policy makers regarding the various levels of fiscal stress under which the State’s school districts and municipalities are operating.

The fiscal stress scores are based on financial information submitted as part of each school district’s ST-3 report filed with the State Education Department annually, and each municipality’s annual report filed with the State Comptroller. Using financial indicators that include year-end fund balance, cash position and patterns of operating deficits, the system creates an overall fiscal stress score which classifies whether a school district or municipality is in “significant fiscal stress,” in “moderate fiscal stress,” as “susceptible to fiscal stress” or “no designation.” Entities that do not accumulate the number of points that would place them in a stress category will receive a financial score but will be classified in a category of “no designation.” This classification should not be interpreted to imply that the entity is completely free of fiscal stress conditions. Rather, the entity’s financial information, when objectively scored according to the FSMS criteria, did not generate sufficient points to place them in one of the three established stress categories.

The most current applicable report of the State Comptroller for the fiscal year ending 2025 designates the District with a stress designation of “No Designation,” a fiscal score of 0.0% and an environmental score of 5.0%.

The fiscal stress reports of the State Comptroller for the most recent available five fiscal years are as follows:

| <u>Fiscal Year</u> <u>Ending In</u> | <u>Stress Designation</u> | <u>Fiscal Score (%)</u> | <u>Stress Designation</u> | <u>Environmental Score (%)</u> |
|--|---------------------------|-------------------------|---------------------------|--------------------------------|
| 2025 | No Designation | 0.0% | No Designation | 5.0% |
| 2024 | No Designation | 0.0 | No Designation | 0.0 |
| 2023 | No Designation | 0.0 | No Designation | 0.0 |
| 2022 | No Designation | 0.0 | No Designation | 0.0 |
| 2021 | No Designation | 0.0 | No Designation | 0.0 |

The financial affairs of the District are subject to periodic compliance reviews by OSC to ascertain whether the District has complied with the requirements of various State and federal statutes. The most recent audit of the District was released on November 5, 2021. The purpose of the audit was to determine whether District officials adequately managed and monitored user accounts and permissions. Additional information regarding State audits can be obtained by visiting the New York State website for Local Governments and School Accountability.

See the State Comptroller’s official website for more information on FSMS. Reference to this website implies no warranty of accuracy of information therein, nor inclusion herein by reference.

REAL PROPERTY TAXES

Assessed and Full Valuations

Real Property Tax Assessments, Rates and Levies Fiscal Year Ending June 30:

| | <u>2022</u> | <u>2023</u> | <u>2024</u> | <u>2025</u> | <u>2026</u> |
|--|------------------------|------------------------|------------------------|------------------------|------------------------|
| Assessed Values: | | | | | |
| Philipstown | \$529,324,608 | \$534,365,642 | \$534,943,811 | \$543,431,292 | \$547,072,526 |
| Putnam Valley | 32,353,350 | 31,984,465 | 34,539,227 | 35,347,090 | 36,638,847 |
| Fishkill | 16,036,844 | 18,736,842 | 19,678,781 | 21,005,140 | 23,783,342 |
| Total Assessed Values | <u>577,714,802</u> | <u>\$585,086,949</u> | <u>\$589,161,819</u> | <u>\$599,783,522</u> | <u>\$607,494,715</u> |
| Equalization Rates:(1) | | | | | |
| Philipstown | 44.60% | 39.35% | 35.22% | 33.76% | 30.67% |
| Putnam Valley | 100.00 | 100.00 | 100.00 | 100.00 | 98.00 |
| Fishkill | 100.00 | 100.00 | 100.00 | 100.00 | 100.00 |
| Full Values: | | | | | |
| Philipstown | \$1,186,826,475 | \$1,357,981,301 | \$1,518,863,745 | \$1,609,689,846 | \$1,783,738,265 |
| Putnam Valley | 32,353,350 | 31,984,465 | 34,539,227 | 35,347,090 | 37,386,579 |
| Fishkill | 16,036,844 | 18,736,842 | 19,678,781 | 21,005,140 | 23,783,342 |
| Total Full Values | <u>\$1,234,216,669</u> | <u>\$1,407,702,608</u> | <u>\$1,573,081,753</u> | <u>\$1,666,042,076</u> | <u>\$1,844,908,186</u> |
| Tax Rate Per \$1,000 | | | | | |
| Assessed Value: | | | | | |
| Philipstown | \$38.04 | \$39.19 | \$39.98 | \$40.49 | \$41.37 |
| Putnam Valley | 16.96 | 15.42 | 14.08 | 13.67 | 12.95 |
| Fishkill | 17.13 | 15.42 | 14.08 | 13.67 | 12.69 |
| Tax Levy (2) | <u>\$20,959,114</u> | <u>\$21,726,382</u> | <u>\$22,154,354</u> | <u>\$22,774,395</u> | <u>\$23,412,078</u> |
| Amount of Levy Uncollected at End of Fiscal Year (3) | None | None | None | None | None |

- (1) The State Office of Real Property Tax Services (the “ORPTS”). All equalization rates are final.
- (2) Levy as originally adopted per tax warrant. However, annual tax levies may be subject to reduction as a result of tax certiorari claims settlements.
- (3) See “*Tax Collection Procedure*” herein.

Tax Levy Limit Law

Chapter 97 of the New York Laws of 2011, as amended, (herein referred to as the “Tax Levy Limit Law” or “Law”) modified previous law by imposing a limit on the amount of real property taxes that a school district may levy.

Prior to the enactment of the Law, there was no statutory limitation on the amount of real property taxes that a school district could levy if its budget had been approved by a simple majority of its voters. In the event the budget had been defeated by the voters, the school district was required to adopt a contingency budget. Under a contingency budget,

school budget increases were limited to the lesser of four percent (4%) of the prior year's budget or one hundred twenty percent (120%) of the consumer price index ("CPI").

Under the Tax Levy Limit Law, there is now a limitation on the amount of tax levy growth from one fiscal year to the next. Such limitation is the lesser of (i) 2% or (ii) the annual percentage increase in the consumer price index, subject to certain exclusions as mentioned below and as described in the Law. A budget with a tax levy that does not exceed such limit will require approval by at least 50% of the voters. Approval by at least 60% of the voters will be required for a budget with a tax levy in excess of the limit. In the event the voters reject the budget, the tax levy for the school district's budget for the ensuing fiscal year may not exceed the amount of the tax levy for the prior fiscal year. School districts will be permitted to carry forward a certain portion of their unused tax levy limitation from a prior year.

The Law permits certain significant exclusions to the tax levy limit for school districts. These include taxes to pay the local share of debt service on bonds or notes, including the Notes, issued to finance voter approved capital expenditures and the refinancing or refunding of such bonds or notes, certain pension cost increases, and other items enumerated in the Law. However, such exclusion does NOT apply to taxes to pay debt service on tax anticipation notes, revenue anticipation notes, budget notes and deficiency notes; and any obligations issued to finance deficits and certain judgments, including tax certiorari refund payments.

Tax Collection Procedure

The District derives its power to levy an ad valorem real property tax from the State Constitution; methods and procedures to levy, collect and enforce this tax are governed by the Real Property Tax Law. Real property assessment rolls used by the District are prepared by the towns comprising the District. Assessment valuations are determined by each town assessor and the State Board which is responsible for certain utility and railroad property. In addition, the ORPTS annually establishes State Equalization Ratios for all localities in the State which are determined by statistical sampling of market sales/assessment studies. The equalization ratios are used in the calculation and distribution of certain State aid and are used by many localities in the calculation of debt contracting and real property taxing limitations. The District has a debt limit but is not subject to a real property taxing limitation.

The Board of Education of the District levies real property taxes after such taxes have been approved by the District's voters. District taxes become a lien upon the final adoption of the District tax roll by the Board of Education. Unpaid interest on school taxes is deemed part of the tax and together with such original tax remains a lien until paid.

District taxes are collected by the component towns of the District between September 1 and November 1. Such taxes may be paid during the month of September without interest. Generally, payments received on or after October 1 must include interest computed at 1% per month from September 1. On or about November 1, the various school tax collecting officers transmit a listing of unpaid taxes to the District. A certified listing of unpaid taxes must be transmitted to the County not later than November 15.

Unpaid school taxes with 7% added thereto are relieved by the County and thereafter collected and enforced in the same manner as real property taxes levied for County purposes. The County must remit the full amount of unpaid taxes to the District by April 1 of the succeeding calendar year. Thus, the District is guaranteed 100% of its taxes in the year of levy.

STAR - School Tax Exemption

The STAR (School Tax Relief) program provides State-funded exemptions from school property taxes to homeowners for their primary residences. Homeowners over 65 years of age with household adjusted gross incomes, less the taxable amount of total distributions from individual retirement accounts and individual retirement annuities ("STAR Adjusted Gross Income") of \$86,000 or less, increased annually according to a cost of living adjustment, are eligible for a "full value" exemption of the first \$65,300 for the 2016-17 school year (adjusted annually). Other homeowners with household STAR Adjusted Gross income not in excess of \$500,000 are eligible for a \$30,000 "full value" exemption on their primary residence. School districts receive full reimbursement from the State for real property taxes exempted pursuant to the STAR program by the first business day in January of each year.

Part A of Chapter 60 of the Laws of 2016 of the State of New York ("Chapter 60") gradually converts the STAR program from a real property tax exemption to a personal income tax credit. Chapter 60 prohibits new STAR exemptions from being granted unless at least one of the applicants held title to the property on the taxable status date of the assessment roll that was used to levy school district taxes for the 2015-2016 school year (generally, March 1, 2015), and the property was granted a STAR exemption on that assessment roll. However, a new homeowner may receive a new personal income tax credit in the form of a check. The dollar benefit to eligible taxpayers will not change. A taxpayer who is eligible for the new credit will receive a check from the State equal to the amount by which the STAR exemption would have reduced his or her school tax bill. A homeowner who owned his or her home on the taxable status date for the assessment roll used to levy taxes for the 2015-2016 school year, and who received a STAR exemption on that roll, may continue to receive a STAR exemption on that home as long as he or she still owns and primarily resides in it. No

further action is required (unless the homeowner has been receiving Basic STAR and wants to apply for Enhanced STAR, which is permissible).

The State 2017-18 Enacted Budget includes changes to Chapter 60. STAR checks are now expected to be mailed out prior to the date that school taxes are payable. The amount of the check will be based on the previous year's amount adjusted by the levy growth factor used for the property tax cap. Any changes that must be made based on the final STAR credit compared to the estimate used will be factored into the subsequent year's STAR credit check or taxpayers also may account for those changes in their State income taxes.

The State's 2019-2020 Enacted Budget included changes to the STAR program. For those homeowners with incomes over \$250,000, the STAR exemption benefit was capped at the 2019 fiscal year level, rather than allowed to grow by up to 2% annually under the STAR credit program. Those homeowners with incomes between \$250,000 and \$500,000 are able to convert to the credit program to maintain the full STAR benefit.

The State's 2020-21 Enacted Budget withholds STAR benefits to taxpayers who are delinquent in the payment of their school taxes and maintains the income limit for the exemption to \$250,000, compared with a \$500,000 limit for the credit.

Approximately 2.9 % of the District's 2025-2026 school tax levy was exempted by the STAR program and the District has received full reimbursement of such exempt taxes from the State. Approximately 3.2 % of the District's 2026-2027 school tax levy is expected to be exempted by the STAR program and the District expects to receive full reimbursement of such exempt taxes from the State in January 2027. (See "State Aid" herein).

Ten of the Largest Taxpayers

| Larger Taxpayers 2025-2026 Tax Roll | | | |
|--|-----------------------|-----------------------|--|
| Name | Nature of Business | Assessed Valuation | % of Total Assessments ⁽¹⁾ |
| State of NY | State Land | \$60,977,428 | 10.04% |
| DSO Trust | Real Estate | 6,172,200 | 1.02 |
| Clemente Materials | Commercial | 4,964,700 | 0.82 |
| Butterfield Realty | Commercial | 4,400,000 | 0.72 |
| Central Hudson | Utility | 2,891,145 | 0.48 |
| 1657, LLC | Real Estate | 2,746,600 | 0.45 |
| 52 Route 9 LLC | Commercial | 2,200,000 | 0.36 |
| Cold Spring Main St Prop | Real Estate | 2,143,327 | 0.35 |
| Magazzino Italian Art | Real Estate | 2,093,800 | 0.34 |
| AEY Holdings | Real Estate | 2,022,600 | 0.33 |
| Total | | \$90,611,800 | 14.92% |

(1) Taxable assessments for 2026 were \$607,494,715.

DISTRICT INDEBTEDNESS

Constitutional and Statutory Requirements

The New York State Constitution and Local Finance Law limit the power of the District (and other municipalities and school districts of the State) to issue obligations and to contract indebtedness. Such constitutional and statutory limitations include the following, in summary form, and are generally applicable to the District.

Purpose and Pledge. The District shall not give or loan any money or property to or in aid of any individual, or private corporation or private undertaking or give or loan its credit to or in aid of any of the foregoing or any public corporation. The District may contract indebtedness only for a District purpose and shall pledge its faith and credit for the payment of principal of and interest thereon.

Payment and Maturity. Except for certain short-term indebtedness contracted in anticipation of taxes or to be paid within one of the two fiscal year immediately succeeding the fiscal year in which such indebtedness was contracted,

indebtedness shall be paid in annual installments commencing no later than two years after the date such indebtedness shall have been contracted and ending no later than the periods of probable usefulness of the objects or purposes determined by statute or the weighted average period of probable usefulness of the several objects or purposes for which such indebtedness is to be contracted; no installment may be more than fifty per centum in excess of the smallest prior installment, unless the District has authorized the issuance of indebtedness having substantially level or declining annual debt service. The District is required to provide an annual appropriation for the payment of interest due during the year on its indebtedness and for the amounts required in such year for amortization and redemption of its serial bonds, bond anticipation notes and capital notes.

General. The District is further subject to constitutional limitation by the general constitutionally imposed duty on the State Legislature to restrict the power of taxation and contracting indebtedness to prevent abuses in the exercise of such power; however, the State Legislature is prohibited by a specific constitutional provision from restricting the power of the District to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted. There is no constitutional limitation on the amount that may be raised by the District by tax on real estate in any fiscal year to pay principal of and interest on all indebtedness. However, the Tax Levy Limit Law imposes a statutory limitation on the power of the District to increase its annual tax levy. (See “*Nature of the Obligation*” and “*Tax Levy Limit Law*” herein).

Statutory Procedure

In general, the State Legislature has, by enactment of the Local Finance Law, authorized the power and procedure for the District to borrow and incur indebtedness subject, of course, to the constitutional and provisions set forth above. The power to spend money, however, generally derives from other law, including the Education Law.

The District is generally required by such laws to submit propositions for the expenditure of money for capital purposes to the qualified electors of the District. Upon approval thereby, the Board of Education may adopt a bond resolution authorizing the issuance of bonds and notes in anticipation of the bonds. With respect to certain school building construction projects, the District is not permitted to spend in excess of \$100,000 for construction costs until the plans and specification for such project have been approved by the Commissioner of Education of the State.

The Local Finance Law also provides a twenty-day statute of limitations after publication of a bond resolution, together with a statutory form of notice which, in effect, stops legal challenges to the validity of obligations authorized by such bond resolution except for alleged constitutional violations.

The Board of Education, as the finance board of the District, has the power to enact tax anticipation note resolutions. Such resolutions may authorize the issuance of tax anticipation notes in an aggregate principal amount necessary to fund anticipated cash flow deficits but in no event exceeding the amount of real property taxes levied or to be levied by the District, less any tax anticipation notes previously issued and less the amount of such taxes, previously received by the District.

The Board of Education, as the finance board of the District, also has the power to authorize the sale and issuance of bonds and notes, including the Bonds. However, such finance board may delegate the power to sell its notes and bonds to the President of the Board of Education, the chief fiscal officer of the District, pursuant to the Local Finance Law.

Debt Limit. Pursuant to the Local Finance Law, the District has the power to contract indebtedness for any District purpose authorized by the Legislature of the State of New York provided the aggregate amount thereof shall not exceed ten per centum of the full valuation of taxable real estate of the District and subject to certain enumerated exclusions and deductions such as State aid for building purposes. The constitutional and statutory method for determining full valuation consists of taking the assessed valuation of taxable real estate for the last completed assessment roll and applying thereto the ratio (equalization rate) which such assessed valuation bears to the full valuation; such ratio is determined by the State Board of Real Property Services. The State Legislature is required to prescribe the manner by which such ratio shall be determined by such authority.

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Debt Contracting Limitation and Power

Computation of Debt Contracting Limitation As of May 14, 2026

| <u>Town</u> | <u>Full Valuation</u> |
|------------------------------------|-----------------------------|
| Philipstown | 1,783,738,265 |
| Putnam Valley | 37,386,579 |
| Fishkill | <u>23,783,342</u> |
| Total Full Valuation | <u>\$1,844,908,186</u> |
| Debt Limit - 10% of Full Valuation | <u><u>\$184,490,819</u></u> |

Statutory Debt Limit and Net Indebtedness

Statutory Debt Limit and Net Indebtedness As of May 14, 2026

| | <u>Amount</u> | <u>Percentage</u> |
|--|-----------------------------|----------------------|
| Debt Contracting Limitation: (10% of the District's Full Valuations) | <u>\$184,490,819</u> | <u>100.00%</u> |
| Gross Direct Debt ⁽¹⁾ : | | |
| Serial Bonds | 4,180,000 | 2.27 |
| Bond Anticipation Notes | <u>2,590,380</u> | <u>1.40</u> |
| | <u>6,770,380</u> | <u>3.67</u> |
| Less Exclusions ⁽²⁾ : | | |
| Appropriations | <u>0</u> | <u>0.00</u> |
| | <u>0</u> | <u>0.00</u> |
| Net Direct Debt | <u>6,770,380</u> | <u>3.67</u> |
| Debt Contracting Margin | <u><u>\$177,720,439</u></u> | <u><u>96.33%</u></u> |

- (1) The District has an energy performance contract outstanding in the amount of \$170,191 as of May 14, 2026, which is not included in this amount (see "*Energy Performance Contract*" herein).
- (2) The District estimates that it will receive State school building aid for outstanding bonds and notes (including the Bonds and Notes), however, such amount has not been certified by the State and, therefore, no deduction has been taken to compute the District's debt limit. Given the effect of "assumed amortization" provided in Chapter 383 of the Laws of 2001 ("Chapter 383"), no assurance can be given regarding the direct or indirect effect of "assumed amortization" on the net indebtedness of the District, or the timing or amount of such building aid in connection with school facilities financed with the proceeds of the Bonds and Notes.

Short-Term Indebtedness

Pursuant to the Local Finance Law, the District is authorized to issue short-term indebtedness, in the form of notes as specified by such statute, to finance both capital and operating purposes.

Bond anticipation notes may be sold to provide moneys for capital projects once a serial bond resolution has been adopted. Generally, bond anticipation notes are issued in the anticipation of the sale of bonds at some future date and may be renewed from time to time up to five years from the date of the first issuance of the notes. Notes may not be renewed after the second year unless there is a principal payment on such notes from a source other than the proceeds of bonds. In no event, may bond anticipation notes be renewed after the sale of bonds in anticipation of which the notes were originally issued.

The District is also authorized by law to issue tax anticipation notes and revenue anticipation notes to provide cash for operating expenditures. Borrowings for this purpose are restricted by formulas contained in the Local Finance Law and the regulations issued under the U.S. Internal Revenue Code of 1986. Notes may be renewed from time to time but not

beyond three years in the case of revenue anticipation notes or five years for tax anticipation notes.

Budget notes may be issued to finance current operating expenditures for which there is no appropriation or the amount so appropriated is not sufficient and deficiency notes may be issued for a deficiency of funds caused by revenues being less than estimated in the current fiscal year budget. Generally, the amount of budget notes or deficiency notes issued may not each exceed 5% of the budget and must be redeemed in the next fiscal year.

Bond Anticipation Notes

**Bond Anticipation Note Indebtedness
As of May 14, 2026**

| Purpose | Original Issue Date | Date of Maturity | Amount Outstanding |
|------------------------------------|---------------------|------------------|--------------------|
| School Buses & Maintenance Vehicle | 08/25/21 | 08/21/26 | 47,000 |
| School Buses & Maintenance Vehicle | 08/25/22 | 08/21/26 | 97,000 |
| School Buses & Maintenance Vehicle | 08/23/23 | 08/21/26 | 141,000 |
| School Buses & Maintenance Vehicle | 08/23/24 | 08/21/26 | 275,380 |
| School Buses & Maintenance Vehicle | 08/21/25 | 08/21/26 | 205,000 |
| Capital Construction Improvements | 06/17/21 | 06/12/26 | 1,025,000 |
| Capital Construction Improvements | 06/13/24 | 06/12/26 | 300,000 |
| Capital Construction Improvements | 12/18/25 | 06/12/26 | 500,000 |
| | | | <u>\$2,590,380</u> |

Tax and Revenue Anticipation Notes

The District last issued tax anticipation notes in the 2006-07 fiscal year. At this time, the District has no plans to issue tax or revenue anticipation notes, or budget or deficiency notes.

Trend of Capital Debt

The following table provides information relating to direct capital indebtedness outstanding as of June 30 for the last five fiscal years.

| | 2021 | 2022 | 2023 | 2024 | 2025 |
|-------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| Bonds | \$6,980,000 | \$6,305,000 | \$5,595,000 | \$4,870,000 | \$4,255,000 |
| Bond Anticipation Notes | 1,341,700 | 1,550,000 | 1,604,000 | 1,965,000 | 2,089,380 |
| Total Outstanding | <u>\$8,321,700</u> | <u>\$7,855,000</u> | <u>\$7,199,000</u> | <u>\$6,835,000</u> | <u>\$6,344,380</u> |

Energy Performance Contract

The District entered into an energy performance contract lease on November 18, 2011, for \$2,101,258. The District makes lease payments of \$85,095.28 on May 18 and November 18 which began May 18, 2012 through maturity on November 18, 2026. As of May 14, 2026, the outstanding balance on the lease is \$170,191.

Overlapping and Underlying Debt

In addition to the District, other political subdivisions have the power to issue bonds and to levy taxes or cause taxes to be levied on taxable real property in the District. The real property taxpayers of the District are responsible for a proportionate share of outstanding debt obligations of these subdivisions. Such taxpayers' share of overlapping and underlying debt is based on the amount of the District's equalized property values taken as a percentage of each separate unit's total equalized values. The following table presents the amount of overlapping and underlying debt and the District's estimated share of this debt. Authorized but unissued debt has not been included.

Statement of Direct and Overlapping Indebtedness
As of May 14, 2026

| | |
|---------------------------|-------------|
| Gross Direct Indebtedness | \$6,770,380 |
| Exclusions and Deductions | 0 |
| Net Direct Indebtedness | \$6,770,380 |

| Overlapping Units | Date Of Report | Net Overlapping Indebtedness | Percentage Applicable | Applicable Net Indebtedness |
|-------------------|-------------------|------------------------------------|--------------------------|-----------------------------------|
| Putnam County | 06/27/25 | \$28,690,000 | 8.61% | \$2,470,209 |
| Towns: | | | | |
| Philipstown | 12/31/24 | 5,082,281 | 49.72 | 2,526,910 |
| Putnam Valley | 12/31/24 | 1,565,000 | 1.75 | 27,388 |
| Fishkill | 06/16/25 | 8,810,000 | 0.61 | 53,741 |
| | | | | \$5,078,248 |

Source: EMMA and Office of the State Comptroller.

Debt Ratios

The following table presents certain debt ratios relating to the District's indebtedness as of May 14, 2026.

| | Amount | Debt Per Capita ⁽¹⁾ | Debt to Full Value ⁽²⁾ |
|----------------------------------|-------------|-----------------------------------|---|
| Net Direct Debt | \$6,770,380 | \$1,263 | 0.37% |
| Net Direct & Overlapping Debt | 11,848,628 | 2,210 | 0.64 |

- (1) The District's 2024 population was estimated at 5,362 according to the US Census Bureau.
(2) The District's estimated full value of taxable real property for fiscal 2025-26 is \$1,844,908,186.

Authorized and Unissued Debt

Following the sale of the Notes, the District will have \$7,178,654 in authorized but unissued debt related to the Project which the District plans to issue in June of 2027 (see “*Authorization for and Purpose of the Notes*” herein).

For the past five fiscal years the District has issued bond anticipation notes to purchase school buses and related equipment. (See “*Bond Anticipation Notes*,” herein). The District expects to issue debt in fiscal year 2025-26 for the purchase of school vehicles in an amount currently estimated not to exceed \$250,000 which amount and timing are preliminary and subject to change.

The District presently has \$100,000 of remaining authorized and unissued debt for improvements to the turf field and school buildings but does not expect to issue this debt.

(The remainder of this page has been intentionally left blank.)

Debt Service Schedule

The following table shows the annual debt service requirements on all presently outstanding bonds of the District, exclusive of the Bonds, and exclusive of any economically defeased obligations.

| Fiscal Years Ending June 30: | Principal | Interest | Total Debt Service |
|---------------------------------------|--------------------|------------------|--------------------------|
| 2026 ⁽¹⁾ | \$645,000 | \$175,552 | \$820,552 |
| 2027 | 675,000 | 150,507 | 825,507 |
| 2028 | 705,000 | 123,794 | 828,794 |
| 2029 | 735,000 | 94,491 | 829,491 |
| 2030 | 730,000 | 64,138 | 794,138 |
| 2031 | 765,000 | 32,213 | 797,213 |
| Total | \$4,255,000 | \$640,695 | \$4,895,695 |

(1) For entire fiscal year.

ECONOMIC AND DEMOGRAPHIC INFORMATION

Population

The population of the District is currently estimated to be 5,362. Population trends for the Town are presented below, together with comparative trends for Putnam County and the State.

Population Trends 2010-2024

| | <u>2010</u> | <u>2020</u> | <u>2024</u> | <u>% Change</u> | |
|---------------|-------------|-------------|-------------|------------------|------------------|
| | | | | <u>2010-2020</u> | <u>2020-2024</u> |
| Town | 9,662 | 9,831 | 9,881 | 1.7% | 0.5% |
| Putnam County | 99,710 | 97,668 | 98,409 | (2.0) | 0.8 |
| State | 19,378,102 | 20,201,249 | 19,867,248 | 4.2 | (1.7) |

Source: U.S. Department of Commerce, Bureau of the Census.

Income

The following table indicates comparative income statistics for the Town, the County and the State.

| | <u>Per Capita Money Income</u> | | | <u>% Change</u> | |
|--------|--------------------------------|-------------|-------------|------------------|------------------|
| | <u>2010</u> | <u>2020</u> | <u>2024</u> | <u>2010-2020</u> | <u>2020-2024</u> |
| Town | \$41,051 | \$56,583 | \$71,388 | 14.2% | 26.2% |
| County | 37,915 | 47,533 | 56,593 | 25.4 | 19.1 |
| State | 30,948 | 40,898 | 50,712 | 32.2 | 24.0 |

Source: U.S. Department of Commerce, Bureau of the Census.

Employment

The following tables provide information concerning employment and unemployment in the County and State. Data provided for the County and State in the following tables is not necessarily representative of the Town or the District.

Average Employed Civilian Labor Force

| | <u>2010</u> | <u>2020</u> | <u>2024</u> | <u>% Change</u> | |
|--------|-------------|-------------|-------------|------------------|------------------|
| | | | | <u>2010-2020</u> | <u>2020-2024</u> |
| County | 48,800 | 47,500 | 54,800 | (2.7)% | 15.4% |
| State | 8,790,600 | 8,631,300 | 9,928,100 | (1.8) | 15.0 |

Source: New York State Department of Labor.

Yearly Average Unemployment Rates

| <u>Year</u> | <u>County</u> | <u>State</u> |
|-------------|---------------|--------------|
| 2021 | 4.1% | 7.1% |
| 2022 | 2.8 | 4.3 |
| 2023 | 2.8 | 4.0 |
| 2024 | 3.0 | 4.2 |
| 2025 | N/A | 4.3 |

Source: New York State Department Labor, Bureau of Labor Statistics.

Monthly Unemployment Rates

| <u>Month</u> | <u>County</u> | <u>State</u> |
|--------------|---------------|--------------|
| April 2025 | 2.5% | 3.8% |
| May | 2.5 | 3.8 |
| June | 2.7 | 4.1 |
| July | 3.1 | 4.8 |
| August | 3.3 | 4.9 |
| September | 3.2 | 4.7 |
| October | N/A | N/A |
| November | 2.9 | 4.4 |
| December | 2.8 | 4.3 |
| January 2026 | 3.3 | 4.7 |
| February | 3.8 | 5.2 |
| March | N/A | 4.4 |

Source: New York State Department of Labor and U.S. Bureau of Labor Statistics.

(The remainder of this page has been intentionally left blank.)

**Major Employers in the County
(Public Sector Only)**

| <u>Name</u> | <u>Industry or Business</u> | <u>Number of Employees</u> |
|---------------------------------------|-----------------------------|----------------------------|
| Carmel Central School District | Public Education | 1,103 |
| Putnam County | County Government | 933 |
| Brewster Central School District | Public Education | 892 |
| Mahopac Central School District | Public Education | 832 |
| Putnam Valley Central School District | Public Education | 343 |
| Haldane Central School District | Public Education | 197 |
| Town of Carmel | Town Government | 140 |
| Town of Kent | Town Government | 108 |
| Town of Patterson | Town Government | 98 |
| Town of Putnam Valley | Town Government | 79 |
| Town of Philipstown | Town Government | 50 |
| Garrison Union Free School District | Public Education | 50 |

Source: Putnam County Annual Financial Information & Operating Data dated June 27, 2025.

**Major Employers in the County
(Private Sector Only)**

| <u>Name</u> | <u>Industry or Business</u> | <u>Number of Employees</u> |
|------------------------------------|-----------------------------|----------------------------|
| Putnam Hospital Center | Health Services | 871 |
| Ace Endico | Food Service & Retail | 709 |
| Green Chimneys | Services | 525 |
| Arms Acres, Inc. | Services | 312 |
| Hudson Valley Cerebral Palsy Assoc | Services | 260 |
| Home Depot | Retail | 255 |
| The ARC of Mid-Hudson | Services | 250 |
| Big V ShopRite Supermarket | Retail | 242 |
| Optum Medical Services PC | Health Services | 230 |
| Acme Supermarkets (3 locations) | Food Services & Retail | 170 |
| TOPS | Food Services & Retail | 148 |
| Friars of the Atonement | Services | 145 |
| DeCiccio Family Market | Food Services & Retail | 128 |
| Stop&Shop | Food Services & Retail | 125 |
| Powers Fasteners, Inc | Manufacturing | 107 |
| DCC Automation | Manufacturing | 85 |
| Kohl's Department Store | Retail | 75 |
| Tompkins Mahopac Bank | Services | 75 |
| Akzo Nobel Corp. | Manufacturing | 70 |
| Unilock | Manufacturing | 65 |
| Materion Advanced Materials | Manufacturing | 63 |
| MV Contract Transportation | Transportation | 62 |
| Fryer Machine Systems, Inc. | Manufacturing | 54 |
| Lamothermic Corporation | Manufacturing | 51 |
| Dunmore Corporation | Manufacturing | 50 |

Source: Putnam County Annual Financial Information & Operating Data dated June 27, 2025.

Financial Institutions

Commercial banks with offices in the District are Wells Fargo and M&T Bank.

Transportation

The District is served by all major forms of transportation. Major highways serving the District include Interstate 84 (linking Massachusetts to Scranton, Pennsylvania via Hartford, Connecticut). Interstate 84 links with both the New York State Thruway and Interstate 684. The District is also served by a network of County and town roads. Passenger rail service is available from the Metro North Commuter Railroad (Cold Spring Station in Philipstown). Commercial air transportation is available at Stewart Airport in Newburgh (approximately 25 miles to the west).

Utilities

Central Hudson Gas & Electric, Verizon and AT&T provide residents of the District with basic public utilities services. Water and sewer services are comprised of both municipal and private systems.

END OF APPENDIX A

APPENDIX B

FINANCIAL STATEMENT SUMMARIES

HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN
GENERAL FUND
BALANCE SHEET
UNAUDITED PRESENTATION

AS OF JUNE 30:

| | 2021 | 2022 | 2023 | 2024 | 2025 |
|--|--------------------------|---------------------|---------------------|---------------------|---------------------|
| ASSETS | | | | | |
| Unrestricted Cash | \$ 2,155,365 | \$ 2,062,373 | \$ 1,366,506 | \$ 2,725,019 | \$ 2,825,541 |
| Restricted Cash | 2,745,607 | 2,939,107 | 3,409,107 | 3,634,107 | 3,534,107 |
| Accounts Receivable | 1,271,377 | 1,174,593 | 1,963,675 | 1,362,114 | 600,132 |
| State and Federal Aid Receivable | 396,631 | 269,013 | 394,450 | 396,395 | 442,796 |
| Due From Other Governments | 0 | 0 | 14,905 | 0 | 0 |
| Due From Other Funds | 430,207 | 712,183 | 786,680 | 396,455 | 483,781 |
| Prepaid Expenditures | 0 | 0 | 0 | 0 | 0 |
| | Total Assets | \$ 6,999,187 | \$ 7,157,269 | \$ 7,935,323 | \$ 8,514,090 |
| | | \$ 6,999,187 | \$ 7,157,269 | \$ 7,935,323 | \$ 8,514,090 |
| LIABILITIES AND FUND EQUITY | | | | | |
| Liabilities: | | | | | |
| Accounts Payable | \$ 444,090 | \$ 387,457 | \$ 407,022 | \$ 475,265 | \$ 482,505 |
| Due To Other Governments | 0 | 0 | 0 | 0 | 0 |
| Due To Other Funds | 223,348 | 250 | 0 | 0 | 0 |
| Due To Teacher's Retirement System | 1,034,751 | 1,110,671 | 1,321,532 | 1,273,917 | 1,413,643 |
| Due To Employees' Retirement System | 116,353 | 79,775 | 95,157 | 119,642 | 138,340 |
| Unearned Revenues | 19,714 | 20,163 | 22,998 | 22,998 | 26,277 |
| | Total Liabilities | 1,838,256 | 1,598,316 | 1,846,709 | 1,891,822 |
| | | 1,838,256 | 1,598,316 | 1,846,709 | 1,891,822 |
| Fund Equity: | | | | | |
| Non-spendable | 0 | 0 | 0 | 0 | 0 |
| Restricted | 2,745,607 | 2,939,107 | 3,409,107 | 3,634,107 | 3,534,107 |
| Assigned | 1,378,228 | 1,448,408 | 1,527,798 | 1,208,259 | 1,129,907 |
| Unassigned | 1,037,096 | 1,171,438 | 1,151,709 | 1,779,902 | 1,161,578 |
| | Total Equity | 5,160,931 | 5,558,953 | 6,088,614 | 6,622,268 |
| | | 5,160,931 | 5,558,953 | 6,088,614 | 6,622,268 |
| Total Liabilities and Fund Equity | \$ 6,999,187 | \$ 7,157,269 | \$ 7,935,323 | \$ 8,514,090 | \$ 7,886,357 |
| | \$ 6,999,187 | \$ 7,157,269 | \$ 7,935,323 | \$ 8,514,090 | \$ 7,886,357 |

The financial data presented on this page has been excerpted from the audited financial statements of the District. Such presentation, however, has not been audited. Complete copies of the District's audited financial statements are available upon request to the District.

HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN
GENERAL FUND
STATEMENT OF REVENUES, EXPENDITURES
AND CHANGES IN FUND BALANCE
UNAUDITED PRESENTATION

AS OF JUNE 30:

| | 2021 | 2022 | 2023 | 2024 | 2025 |
|---|---------------------|---------------------|---------------------|---------------------|---------------------|
| REVENUES: | | | | | |
| Real Property Taxes | \$ 19,521,990 | \$ 20,021,389 | \$ 20,837,000 | \$ 21,351,744 | \$ 22,020,802 |
| Other Tax Items | 1,049,678 | 965,669 | 917,653 | 826,039 | 753,826 |
| Charges For Services | 932,766 | 783,807 | 864,828 | 974,356 | 961,090 |
| Use Of Money And Property | 8,332 | 3,884 | 127,135 | 485,029 | 454,709 |
| Sale Of Property And Compensation For Loss | 61,085 | 32,493 | 32,926 | 25,459 | 10,727 |
| Miscellaneous | 187,417 | 72,033 | 92,241 | 80,550 | 108,512 |
| State Aid | 3,074,045 | 3,222,092 | 3,596,088 | 4,310,218 | 4,423,338 |
| Federal Aid | 33,514 | 0 | 0 | 0 | 0 |
| Medicaid Reimbursement | 1,700 | 13,366 | 6,188 | 860 | 2,872 |
| | 24,870,527 | 25,114,733 | 26,474,059 | 28,054,255 | 28,735,876 |
| EXPENDITURES: | | | | | |
| Current: | | | | | |
| General Support | 2,997,473 | 3,240,191 | 3,465,446 | 3,436,730 | 3,962,034 |
| Instruction | 12,947,110 | 13,074,664 | 13,666,666 | 14,442,739 | 15,257,669 |
| Pupil Transportation | 871,326 | 916,432 | 971,582 | 1,040,056 | 982,597 |
| Employee Benefits | 5,891,377 | 6,002,158 | 6,385,601 | 6,604,832 | 7,044,649 |
| Debt Service | 1,296,410 | 1,321,555 | 1,368,036 | 1,377,374 | 1,351,757 |
| | 24,003,696 | 24,555,000 | 25,857,331 | 26,901,731 | 28,598,706 |
| Excess of Revenues Over Expenditures | 866,831 | 559,733 | 616,728 | 1,152,524 | 137,170 |
| OTHER FINANCING SOURCES (USES): | | | | | |
| Proceeds from Issuance of Leases | 0 | 26,252 | 0 | 291,514 | 0 |
| BANs Redeemed from Appropriations | 0 | 0 | 0 | 0 | 165,202 |
| Operating Transfers - In | 0 | 0 | 0 | 0 | 0 |
| Operating Transfers - Out | (272,459) | (187,963) | (87,067) | (910,384) | (1,099,048) |
| | (272,459) | (161,711) | (87,067) | (618,870) | (933,846) |
| Excess of Revenues and Other Sources Over (Under) Expenditures and Other Uses | 594,372 | 398,022 | 529,661 | 533,654 | (796,676) |
| Fund Equity - Beginning of Year | 4,566,559 | 5,160,931 | 5,558,953 | 6,088,614 | 6,622,268 |
| Prior Period Adjustment | 0 | 0 | 0 | 0 | 0 |
| Fund Equity - End of Year | \$ 5,160,931 | \$ 5,558,953 | \$ 6,088,614 | \$ 6,622,268 | \$ 5,825,592 |

The financial data presented on this page has been excerpted from the audited financial statements of the District. Such presentation, however, has not been audited. Complete copies of the District's audited financial statements are available upon request to the District.

HALDANE CENTRAL SCHOOL DISTRICT AT PHILIPSTOWN
GENERAL FUND
STATEMENT OF ESTIMATED REVENUES AND APPROPRIATIONS

| | <u>Adopted Budget 2024-2025</u> | <u>Adopted Budget 2025-2026</u> | <u>Tentative Budget 2026-2027</u> |
|--|---|---|---|
| ESTIMATED REVENUES: | | | |
| Real Property Taxes | \$ 22,774,395 | \$ 23,412,078 | \$ 24,707,361 |
| Other Tax Items | 20,000 | 30,000 | 30,000 |
| Charges For Services | 915,300 | 1,050,300 | 1,375,300 |
| Use Of Money And Property | 100,200 | 301,000 | 302,250 |
| State Aid | 4,437,045 | 4,391,012 | 4,507,965 |
| Miscellaneous | 15,000 | 20,000 | 20,000 |
| Refunds of Prior Years Expenses | 52,090 | 55,000 | 55,000 |
| | <u>28,314,030</u> | <u>29,259,390</u> | <u>30,997,876</u> |
| TOTAL ESTIMATED REVENUES | | | |
| Retirement Contribution Reserve | 250,000 | 250,000 | 250,000 |
| Fund Balance | 645,000 | 645,000 | 645,000 |
| Capital Reserve | <u>0</u> | <u>0</u> | <u>0</u> |
| APPROPRIATED FUND BALANCE AND RESERVES | | | |
| | <u>895,000</u> | <u>895,000</u> | <u>895,000</u> |
| TOTAL ESTIMATED REVENUES AND APPROPRIATED FUND BALANCE AND RESERVES | | | |
| | <u><u>29,209,030</u></u> | <u><u>30,154,390</u></u> | <u><u>31,892,876</u></u> |
| APPROPRIATIONS: | | | |
| General Support | 3,496,140 | 3,712,267 | 3,805,567 |
| Instruction | 15,876,968 | 16,478,518 | 17,334,724 |
| Pupil Transportation | 1,102,849 | 1,145,439 | 1,132,875 |
| Employee Benefits | 7,394,339 | 7,449,785 | 7,479,200 |
| Debt Service | 1,273,734 | 1,278,381 | 1,975,510 |
| Interfund Transfers | 65,000 | 90,000 | 165,000 |
| | <u>29,209,030</u> | <u>30,154,390</u> | <u>31,892,876</u> |
| TOTAL APPROPRIATIONS | | | |

APPENDIX C

**AUDITED FINANCIAL STATEMENTS
FOR THE FISCAL YEAR ENDED JUNE 30, 2025***

**CAN BE ACCESSED ON THE ELECTRONIC MUNICIPAL MARKET ACCESS
("EMMA") WEBSITE
OF THE MUNICIPAL SECURITIES RULEMAKING BOARD ("MSRB")
AT THE FOLLOWING LINK:**

<https://emma.msrb.org/P11897898.pdf>

**The audited financial statements referenced above are hereby incorporated into this
Official Statement.**

*** Bonadio & Co., LLP has not commented on or approved this Official Statement, has not been requested to perform any procedures on the information in its included report since its date and has not been asked to consent to the inclusion of its report in this Official Statement.**

APPENDIX D

FORM OF BOND COUNSEL'S OPINION FOR THE BONDS

[DRAFT FORM OF APPROVING OPINION]

June 11, 2026

Haldane Central School District at Philipstown
Counties of Dutchess and Putnam,
State of New York

Re: Haldane Central School District at Philipstown,
Dutchess and Putnam Counties, New York
\$1,300,000 Public Improvement (Serial) Bonds, 2026

Ladies and Gentlemen:

We have been requested to render our opinion as to the validity of an issue of \$1,300,000 Public Improvement (Serial) Bonds, 2026 (the "Obligations"), of the Haldane Central School District at Philipstown, Dutchess and Putnam Counties, New York (the "Obligor"), dated June 11, 2026, initially issued in registered form in denominations such that one bond shall be issued for each maturity of bonds in such amounts as hereinafter set forth, bearing interest at the rate of _____ centum (_____%) per annum, payable on June 1, 2027 and semi-annually thereafter on December 1 and June, and maturing in the amount of \$75,000 on June 1, 2027, \$80,000 on June 1 in each of the years 2028 and 2029, \$85,000 on June 1 in each of the years 2030 and 2031, \$90,000 on June 1 in each of the years 2032 and 2033, \$95,000 on June 1 in each of the years 2034 to 2036, both inclusive, \$100,000 on June 1, 2037, \$105,000 on June 1, 2038, \$110,000 on June 1, 2039, and \$115,000 on June 1, 2040.

We have examined:

- (1) the Constitution and statutes of the State of New York;
- (2) the Internal Revenue Code of 1986, including particularly Sections 103 and 141 through 150 thereof, and the applicable regulations of the United States Treasury Department promulgated thereunder (collectively, the "Code");
- (3) an arbitrage certificate executed on behalf of the Obligor which includes, among other things, covenants, relating to compliance with the Code, with the owners of the Obligations that the Obligor will, among other things, (i) take all actions on its part necessary to cause interest on the Obligations not to be includable in the gross income of the owners thereof for Federal income tax purposes, including, without limitation, restricting, to the extent necessary, the yield on investments made with the proceeds of the Obligations and investment earnings thereon, making required payments to the Federal government, if any, and maintaining books and records in a specified manner, where appropriate, and (ii) refrain from taking any action which would cause interest on the Obligations to be includable in the gross income of the owners thereof for Federal income tax purposes, including, without limitation, refraining from spending the proceeds of the Obligations and investment earnings thereon on certain specified purposes (the "Arbitrage Certificate"); and
- (4) a certificate executed on behalf of the Obligor which includes, among other things, a statement that compliance with such covenants is not prohibited by, or violative of, any provision of local or special law, regulation or resolution applicable to the Obligor.

We also have examined a certified copy of proceedings of the finance board of the Obligor and other proofs authorizing and relating to the issuance of the Obligations, including the form of the Obligations. In rendering the opinions expressed herein we have assumed (i) the accuracy and truthfulness of all public records, documents and proceedings, including factual information, expectations and statements contained therein, examined by us which have been executed or certified by public officials acting within the scope of their official capacities, and have not verified the accuracy or truthfulness thereof, and (ii) compliance by the Obligor with the covenants contained in the Arbitrage Certificate. We also have assumed the genuineness of the signatures appearing upon such public records, documents and proceedings and the certifications thereof.

In our opinion:

- (a) The Obligations have been authorized and issued in accordance with the Constitution and statutes of the State of New York and constitute valid and legally binding general obligations of the Obligor, all the taxable real property within which is subject to the levy of ad valorem taxes to pay the Obligations and interest thereon, without limitation as to rate or amount; provided, however, that the enforceability (but not the validity) of the Obligations: (i) may be limited by any applicable bankruptcy, insolvency or other law now existing or hereafter enacted by said State or the Federal government affecting the enforcement of creditors' rights, and (ii) may be subject to the exercise of judicial discretion in appropriate cases.
- (b) The Obligor has the power to comply with its covenants with respect to compliance with the Code as such covenants relate to the Obligations; provided, however, that the enforceability (but not the validity) of such covenants may be limited by any applicable bankruptcy, insolvency or other law now existing or hereafter enacted by said State or the Federal government affecting the enforcement of creditors' rights.
- (c) Interest on the Obligations is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986, and is exempt from personal income taxes imposed by the State of New York and any political subdivision thereof (including The City of New York). Interest on the Obligation(s) is not a specific preference item for purposes of the federal individual alternative minimum tax. Interest on the Obligations included in adjusted financial statement income of certain corporations is not excluded from the federal corporate alternative minimum tax. We express no opinion regarding other tax consequences related to the ownership or disposition of, or the amount, accrual or receipt of interest on, the Obligations.

Certain agreements, requirements and procedures contained or referred to in the Arbitrage Certificate and other relevant documents may be changed and certain actions (including, without limitation, economic defeasance of the Obligations) may be taken or omitted under the circumstances and subject to the terms and conditions set forth in such documents.

The opinions expressed herein are based on an analysis of existing laws, regulations, rulings and court decisions and cover certain matters not directly addressed by such authorities. Such opinions may be affected by actions taken or omitted or events occurring after the date hereof. Accordingly, this opinion is not intended to, and may not, be relied upon in connection with any such actions, events or matters. Our engagement with respect to the Obligations has concluded with their issuance, and we disclaim any obligation to update this opinion. We have assumed, without undertaking to verify, the accuracy of the factual matters represented, warranted or certified in the documents. Furthermore, we have assumed compliance with all covenants and agreements contained in the Arbitrage Certificate, including without limitation covenants and agreements compliance with which is necessary to assure that future actions, omissions or events will not cause interest on the Obligations to be included in gross income for federal income tax purposes. We call attention to the fact that the rights and obligations under the Obligations and the Arbitrage Certificate and their enforceability may be subject to bankruptcy, insolvency, reorganization, arrangement, fraudulent conveyance, moratorium or other laws relating to or affecting creditors' rights, to

the application of equitable principles, to the exercise of judicial discretion in appropriate cases and to the limitations on legal remedies against municipal corporations such as the Obligor in the State of New York. We express no opinion with respect to any indemnification, contribution, penalty, choice of law, choice of forum, choice of venue, or waiver provisions contained in the foregoing documents.

The scope of our engagement in relation to the issuance of the Obligations has extended solely to the examination of the facts and law incident to rendering the opinions expressed herein. Such opinions are not intended and should not be construed to express or imply any conclusion that the amount of real property subject to taxation within the boundaries of the Obligor, together with other legally available sources of revenue, if any, will be sufficient to enable the Obligor to pay the principal of or interest on the Obligations as the same respectively become due and payable. Reference should be made to the Official Statement prepared by the Obligor in relation to the Obligations for factual information which, in the judgment of the Obligor, could materially affect the ability of the Obligor to pay such principal and interest. While we have participated in the preparation of such Official Statement, we have not verified the accuracy, completeness or fairness of the factual information contained therein and, accordingly, we express no opinion as to whether the Obligor, in connection with the sale of the Obligations, has made any untrue statement of a material fact or omitted to state a material fact necessary in order to make any statements made, in the light of the circumstances under which they were made, not misleading.

Very truly yours,

/s/ ORRICK, HERRINGTON & SUTCLIFFE LLP

APPENDIX E

FORM OF BOND COUNSEL'S OPINION FOR THE NOTES

FORM OF BOND COUNSEL'S OPINION FOR THE NOTES

Haldane Central School District at Philipstown,
Dutchess and Putnam Counties,
State of New York

June 11, 2026

Re: Haldane Central School District at Philipstown, Dutchess and Putnam Counties,
New York
\$20,181,294 Bond Anticipation Notes, 2026 Series A

Ladies and Gentlemen:

We have been requested to render our opinion as to the validity of a \$20,181,294 Bond Anticipation Notes, 2026 Series A (the "Obligation"), of the Haldane Central School District at Philipstown, Dutchess and Putnam Counties, New York (the "Obligor"), dated June 11, 2026, numbered ____, of the denomination of \$20,181,294, bearing interest at the rate of _____% per annum, payable at maturity, and maturing June 11, 2027.

We have examined:

- (1) the Constitution and statutes of the State of New York;
- (2) the Internal Revenue Code of 1986, including particularly Sections 103 and 141 through 150 thereof, and the applicable regulations of the United States Treasury Department promulgated thereunder (collectively, the "Code");
- (3) an arbitrage certificate executed on behalf of the Obligor which includes, among other things, covenants, relating to compliance with the Code, with the owners of the Obligation that the Obligor will, among other things, (i) take all actions on its part necessary to cause interest on the Obligation not to be includable in the gross income of the owners thereof for Federal income tax purposes, including, without limitation, restricting, to the extent necessary, the yield on investments made with the proceeds of the Obligation and investment earnings thereon, making required payments to the Federal government, if any, and maintaining books and records in a specified manner, where appropriate, and (ii) refrain from taking any action which would cause interest on the Obligation to be includable in the gross income of the owners thereof for Federal income tax purposes, including, without limitation, refraining from spending the proceeds of the Obligation and investment earnings thereon on certain specified purposes (the "Arbitrage Certificate"); and
- (4) a certificate executed on behalf of the Obligor which includes, among other things, a statement that compliance with such covenants is not prohibited by, or violative of, any provision of local or special law, regulation or resolution applicable to the Obligor.

We also have examined a certified copy of proceedings of the finance board of the Obligor and other proofs authorizing and relating to the issuance of the Obligation, including the form of the Obligation. In rendering the opinions expressed herein we have assumed (i) the accuracy and truthfulness of all public records, documents and proceedings, including factual information, expectations and statements contained therein, examined by us which have been executed or certified

by public officials acting within the scope of their official capacities, and have not verified the accuracy or truthfulness thereof, and (ii) compliance by the Obligor with the covenants contained in the Arbitrage Certificate. We also have assumed the genuineness of the signatures appearing upon such public records, documents and proceedings and the certifications thereof.

In our opinion:

- (a) The Obligation has been authorized and issued in accordance with the Constitution and statutes of the State of New York and constitutes a valid and legally binding general obligation of the Obligor, all the taxable real property within which is subject to the levy of ad valorem taxes to pay the Obligation and interest thereon, without limitation as to rate or amount; provided, however, that the enforceability (but not the validity) of the Obligation: (i) may be limited by any applicable bankruptcy, insolvency or other law now existing or hereafter enacted by said State or the Federal government affecting the enforcement of creditors' rights, and (ii) may be subject to the exercise of judicial discretion in appropriate cases.
- (b) The Obligor has the power to comply with its covenants with respect to compliance with the Code as such covenants relate to the Obligation; provided, however, that the enforceability (but not the validity) of such covenants may be limited by any applicable bankruptcy, insolvency or other law now existing or hereafter enacted by said State or the Federal government affecting the enforcement of creditors' rights.
- (c) Interest on the Obligation is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986, and is exempt from personal income taxes imposed by the State of New York and any political subdivision thereof (including The City of New York). Interest on the Obligation is not a specific preference item for purposes of the federal individual alternative minimum tax. We observe that interest on the Obligation included in adjusted financial statement income of certain corporations is not excluded from the federal corporate alternative minimum tax. We express no opinion regarding other tax consequences related to the ownership or disposition of, or the amount, accrual or receipt of interest on, the Obligation.

Certain agreements, requirements and procedures contained or referred to in the Arbitrage Certificate and other relevant documents may be changed and certain actions (including, without limitation, economic defeasance of the Obligation) may be taken or omitted under the circumstances and subject to the terms and conditions set forth in such documents.

The opinions expressed herein are based on an analysis of existing laws, regulations, rulings and court decisions and cover certain matters not directly addressed by such authorities. Such opinions may be affected by actions taken or omitted or events occurring after the date hereof. Accordingly, this opinion is not intended to, and may not, be relied upon in connection with any such actions, events or matters. Our engagement with respect to the Obligation has concluded with their issuance, and we disclaim any obligation to update this opinion. We have assumed, without undertaking to verify, the accuracy of the factual matters represented, warranted or certified in the documents. Furthermore, we have assumed compliance with all covenants and agreements contained in the Arbitrage Certificate, including without limitation covenants and agreements compliance with which is necessary to assure that future actions, omissions or events will not cause interest on the Obligation to be included in gross income for federal income tax purposes. We call attention to the fact that the rights and obligations under the Obligation and the Arbitrage Certificate and their enforceability may be subject to bankruptcy, insolvency, reorganization, arrangement, fraudulent conveyance, moratorium or other laws relating to or affecting creditors' rights, to the application of equitable principles, to the exercise of judicial discretion in appropriate cases and to the limitations

on legal remedies against municipal corporations such as the Obligor in the State of New York. We express no opinion with respect to any indemnification, contribution, penalty, choice of law, choice of forum, choice of venue, or waiver provisions contained in the foregoing documents.

The scope of our engagement in relation to the issuance of the Obligation has extended solely to the examination of the facts and law incident to rendering the opinions expressed herein. Such opinions are not intended and should not be construed to express or imply any conclusion that the amount of revenues or moneys of the Obligor legally available will be sufficient to enable the Obligor to pay the principal of or interest on the Obligation as the same respectively become due and payable. Reference should be made to the Official Statement prepared by the Obligor in relation to the Obligation for factual information which, in the judgment of the Obligor, could materially affect the ability of the Obligor to pay such principal and interest. While we have participated in the preparation of such Official Statement, we have not verified the accuracy, completeness or fairness of the factual information contained therein and, accordingly, we express no opinion as to whether the Obligor, in connection with the sale of the Obligation, has made any untrue statement of a material fact or omitted to state a material fact necessary in order to make any statements made, in the light of the circumstances under which they were made, not misleading.

Very truly yours,

/s/ORRICK, HERRINGTON & SUTCLIFFE LLP