
FEDERAL TAX CERTIFICATE

Dated as of April 29, 2020

OF

CITY OF KANSAS CITY, MISSOURI,

\$43,360,000
CITY OF KANSAS CITY, MISSOURI
GENERAL OBLIGATION BONDS
SERIES 2020A

FEDERAL TAX CERTIFICATE

TABLE OF CONTENTS

	<u>Page</u>
PARTIES AND RECITALS	1
<u>ARTICLE I</u>	
DEFINITIONS	
Section 1.1. Definitions of Words and Terms	1
<u>ARTICLE II</u>	
GENERAL REPRESENTATIONS AND COVENANTS	
Section 2.1. Representations and Covenants of the City	7
Section 2.2. Survival of Representations and Covenants	10
<u>ARTICLE III</u>	
ARBITRAGE CERTIFICATIONS AND COVENANTS	
Section 3.1. General	10
Section 3.2. Reasonable Expectations	10
Section 3.3. Purposes of the Financing.....	11
Section 3.4. Funds and Accounts	11
Section 3.5. Amount and Use of Bond Proceeds and Other Money.....	11
Section 3.6. Multipurpose Issue	11
Section 3.7. No Current Refunding	11
Section 3.8. Project Completion.....	11
Section 3.9. Sinking Funds.....	12
Section 3.10. Reserve, Replacement and Pledged Funds.....	12
Section 3.11. Purpose Investment Yield.....	12
Section 3.12. Issue Price and Yield on Bonds.....	12
Section 3.13. Miscellaneous Arbitrage Matters.....	12
Section 3.14. Conclusion.....	13
<u>ARTICLE IV</u>	
POST-ISSUANCE TAX REQUIREMENTS, POLICIES AND PROCEDURES	
Section 4.1. General	13
Section 4.2. Record Keeping, Use of Bond Proceeds and Use of Financed Facility	13
Section 4.3. Temporary Periods/Yield Restriction.....	14
Section 4.4. Procedures for Establishing Fair Market Value.....	15
Section 4.5. Certain Gross Proceeds Exempt from the Rebate Requirement.....	17
Section 4.6. Computation and Payment of Arbitrage Rebate and Yield Reduction Amounts.....	19

ARTICLE V

MISCELLANEOUS PROVISIONS

Section 5.1. Term of Tax Certificate20
Section 5.2. Amendments20
Section 5.3. Opinion of Bond Counsel20
Section 5.4. Reliance20
Section 5.5. Severability21
Section 5.6. Benefit of Agreement21
Section 5.7. Default, Breach and Enforcement21
Section 5.8. Execution in Counterparts21
Section 5.9. Governing Law21
Section 5.10. Electronic Transactions21

Signatures..... S-1

Exhibit A – Debt Service Schedule and Proof of Bond Yield

Exhibit B – IRS Form 8038-G

Exhibit C – Ordinances Evidencing Intent to Finance

Exhibit D – Description of Property Comprising the Financed Facility and List of Reimbursement Expenditures

Exhibit E – Sample Annual Compliance Checklist

Exhibit F – Certificates of Department Heads

Exhibit G – Sample Final Written Allocation

* * *

FEDERAL TAX CERTIFICATE

THIS FEDERAL TAX CERTIFICATE (the “Tax Certificate”), is executed as of April 29, 2020, by the **CITY OF KANSAS CITY, MISSOURI**, a political subdivision organized and existing under the laws of the State of Missouri (the “City”).

RECITALS

1. This Tax Certificate is being executed and delivered in connection with the issuance by the City of \$43,360,000 principal amount of General Obligation Bonds, Series 2020A, dated the date of this Tax Certificate (the “Bonds”), under Ordinance No. 200152, passed by the City Council on February 27, 2020, as amended and supplemented by Ordinance No. 200216, passed by the City Council on March 19, 2020 (the “Ordinance”), for the purposes described in this Tax Certificate and in the Ordinance.

2. The Internal Revenue Code of 1986, as amended (the “Code”), and the applicable Regulations and rulings issued by the U.S. Treasury Department (the “Regulations”), impose certain limitations on the uses and investment of the Bond proceeds and of certain other money relating to the Bonds and set forth the conditions under which the interest on the Bonds will be excluded from gross income for federal income tax purposes.

3. The City is executing this Tax Certificate in order to set forth certain facts, covenants, representations, and expectations relating to the use of Bond proceeds and the property financed or refinanced with those proceeds and the investment of the Bond proceeds and of certain other related money, in order to establish and maintain the exclusion of the interest on the Bonds from gross income for federal income tax purposes, and to provide guidance for complying with the arbitrage rebate and yield reduction amounts provisions of Code § 148(f).

4. The City has adopted a Maintenance of Municipal Bonds and Master Lease Purchase Agreements policy and procedure dated July 1, 2012 (the “Tax Compliance Procedure”) for the purpose of setting out general procedures for the City to continuously monitor and comply with the federal income tax requirements set out in the Code and the Regulations.

5. This Tax Certificate is entered into to help the City implement the Tax Compliance Procedure and to set out specific tax compliance procedures applicable to the Bonds.

NOW, THEREFORE, the City represents, covenants and agrees as follows:

ARTICLE I

DEFINITIONS

Section 1.1. Definitions of Words and Terms. Except as otherwise provided in this Tax Certificate or unless the context otherwise requires, capitalized words and terms used in this Tax Certificate have the same meanings as set forth in the Ordinance, and certain other words and phrases have the meanings assigned in Code §§ 103, 141-150 and the Regulations. The following words and terms used in this Tax Certificate have the following meanings:

“Adjusted Gross Proceeds” means the Gross Proceeds of the Bonds reduced by amounts (a) in a Bona Fide Debt Service Fund or a reasonably required reserve or replacement fund, (b) that as of the Issue Date are not expected to be Gross Proceeds, but which arise after the end of the applicable spending period, and (c) representing grant repayments or sale or Investment proceeds of any purpose Investment.

“Animal Shelter” means the City’s new animal shelter located on approximately 15 acres of land in the northeast corner of Swope Park between Elmwood Avenue and E. Gregory Boulevard as further described on **Exhibit D** to this Tax Agreement.

“Available Construction Proceeds” means the sale proceeds of the Bonds, increased by (a) Investment earnings on the sale proceeds, (b) earnings on amounts in a reasonably required reserve or replacement fund allocable to the Bonds but not funded from the Bonds, and (c) earnings on such earnings, reduced by sale proceeds (1) in any reasonably required reserve fund or (2) used to pay issuance costs of the Bonds. But Available Construction Proceeds do not include Investment earnings on amounts in a reasonably required reserve or replacement fund after the earlier of (i) the second anniversary of the Issue Date or (ii) the date the Financed Facility is substantially completed.

“Bona Fide Debt Service Fund” means a fund, which may include Bond proceeds, that (a) is used primarily to achieve a proper matching of revenues with principal and interest payments within each Bond Year; and (b) is depleted at least once each Bond Year, except for a reasonable carryover amount not to exceed the greater of (1) the earnings on the fund for the immediately preceding Bond Year, or (2) one-twelfth of the principal and interest payments on the Bonds for the immediately preceding Bond Year.

“Bond” or **“Bonds”** means any bond or bonds described in the recitals, authenticated and delivered under the Ordinance.

“Bond Compliance Officer” means the Director of Finance of the City or the person he or she delegates this responsibility in writing.

“Bond Counsel” means Gilmore & Bell, P.C., or other firm of nationally recognized bond counsel acceptable to the City.

“Bond Year” means each 1-year period (or shorter period for the first Bond Year) ending February 1, or another 1-year period selected by the City.

“City” means Kansas City, Missouri.

“Code” means the Internal Revenue Code of 1986, as amended.

“Compliance Account” means the Series 2020A Compliance Account created as a separate account within the Rebate Fund under the Ordinance, to provide for the payment of certain expenses as described in **Section 2.1(h)(3)** of this Tax Certificate.

“Computation Date” means each date on which arbitrage rebate and Yield reduction amounts for the Bonds are computed. The City may treat any date as a Computation Date, subject to the following limits:

- (a) the first rebate installment payment must be made for a Computation Date not later than 5 years after the Issue Date;

(b) each subsequent rebate installment payment must be made for a Computation Date not later than 5 years after the previous Computation Date for which an installment payment was made; and

(c) the date the last Bond is discharged is the final Computation Date.

The City selects February 1, 2025 as the first Computation Date but reserves the right to select a different date consistent with the Regulations.

“Costs of Issuance Fund” means the Costs of Issuance Fund established under the Ordinance.

“Debt Service Fund” means the Series 2020A Debt Service Fund established under the Ordinance.

“Final Written Allocation” means the Final Written Allocation of expenditures prepared by the Bond Compliance Officer in accordance with the Tax Compliance Procedure and **Section 4.2(b)** of this Tax Certificate.

“Financed Facility” means the portion of the Project being financed or refinanced with the proceeds of the Bonds as described on **Exhibit D**.

“Gross Proceeds” means (a) sale proceeds (any amounts actually or constructively received by the City from the sale of the Bonds, including amounts used to pay underwriting discount or fees, but excluding pre-issuance accrued interest), (b) Investment proceeds (any amounts received from investing sale proceeds or other Investment proceeds), (c) any amounts held in a sinking fund for the Bonds, (d) any amounts held in a pledged fund or reserve fund for the Bonds, and (e) any other replacement proceeds. Specifically, Gross Proceeds includes (but is not limited to) amounts held in the following funds and accounts:

- Project Fund;
- Costs of Issuance Fund;
- Debt Service Fund;
- Compliance Account; and
- Rebate Fund (to the extent funded with sale proceeds or Investment proceeds of the Bonds).

“Guaranteed Investment Contract” is any Investment with specifically negotiated withdrawal or reinvestment provisions and a specifically negotiated interest rate, including any agreement to supply Investments on 2 or more future dates (*e.g.*, a forward supply contract).

“Investment” means any security, obligation, annuity contract or other investment-type property that is purchased directly with, or otherwise allocated to, Gross Proceeds. This term does not include a tax-exempt bond, except for “specified private activity bonds” as defined in Code § 57(a)(5)(C), but it does include the investment element of most interest rate caps.

“IRS” means the United States Internal Revenue Service.

“Issue Date” means April 29, 2020.

“Kansas City Pet Project” means the Kansas City Pet Project, a Missouri non-profit corporation.

“KCCAC” means the Kansas City Campus for Animal Care, a Missouri non-profit corporation.

“Management or Service Agreement” means a legal agreement defined in Regulations § 1.141-3(b) as a management, service, or incentive payment contract with an entity that provides services involving all or a portion of any function of the Financed Facility, such as a contract to manage the entire Financed Facility or a portion of the Financed Facility. Contracts for services that are solely incidental to the primary governmental function of the Financed Facility (for example, contracts for janitorial, office equipment repair, billing or similar services); however, are not treated as Management Agreements.

“Measurement Period” means, with respect to each item of property financed as part of the Financed Facility, the period beginning on the later of (a) the Issue Date or (b) the date the property is placed in service and ending on the earlier of (1) the final maturity date of the Bonds or (2) the end of the expected economic useful life of the property.

“Minor Portion” means \$100,000.

“Municipal Advisor” means, collectively, Hilltop Securities Inc. and Mood Reid Financial Advisors, who have been retained by the City to provide financial advisory services.

“Net Proceeds” means the sale proceeds (excluding pre-issuance accrued interest), less an allocable share of any proceeds deposited in a reasonably required reserve or replacement fund, plus an allocable share of all Investment earnings on such sale proceeds.

“Non-Qualified Use” means use of Bond proceeds or the Financed Facility in a trade or business carried on by any Non-Qualified User. The rules set out in Regulations § 1.141-3 determine whether Bond proceeds or the Financed Facility are “used” in a trade or business. Generally, ownership, a lease, or any other use that grants a Non-Qualified User a special legal right or entitlement with respect to the Financed Facility, will constitute use under Regulations § 1.141-3.

“Non-Qualified User” means any person or entity other than a Qualified User.

“Official Intent Date” means January 19, 2017 and March 22, 2018 as described in **Section 2.1(h)**.

“Opinion of Bond Counsel” means the written opinion of Bond Counsel to the effect that the proposed action or the failure to act will not adversely affect the exclusion of the interest on the Bonds from gross income for federal income tax purposes.

“Ordinance” means Ordinance No. 200152, passed by the City Council on February 27, 2020, as amended and supplemented by Ordinance No. 200216, passed by the City Council on March 19, 2020, as originally executed by the City as amended and supplemented in accordance with the provisions of the Ordinance.

“Post-Issuance Tax Requirements” means those requirements related to the use of proceeds of the Bonds, the use of the Financed Facility and the investment of Gross Proceeds after the Issue Date of the Bonds.

“Project” means all of the property being acquired, developed, constructed, renovated, and equipped by the City using Bond proceeds and Qualified Equity, all as described on **Exhibit D**.

“Project Fund” means the Series 2020A Project Fund established under the Ordinance, including the following three separate accounts established within the Project Fund: (1) the Street, Sidewalk, and

Bridge Project Account; (2) the Flood Control Project Account; and (3) the Public Buildings Project Account.

“Qualified Basic Research Agreement” means any Research or Clinical Testing Agreement that (1) involves only “basic research” and (2) meets the “qualified license requirement.” A Research or Clinical Testing Agreement involves “basic research” if the research conducted pursuant to the Research or Clinical Testing Agreement is an investigation for the advancement of scientific knowledge and the subject of the Research or Clinical Testing Agreement has no specific commercial objective. The “qualified license requirement” is met either (1) where any license granted to use any product developed as a result of the research is only on the same terms as the City would permit that use by any unrelated, non-sponsoring party (i.e. the sponsor must pay a competitive price for its use), and the price paid by the licensee for use of any license or other product derived from the Research or Clinical Testing Agreement is determined at the time the invention or other resulting technology is available for use or (2) the City determines the research to be performed and the manner in which it is to be performed under the Research or Clinical Testing Agreement, title to any patent or other product incidentally resulting from the Research or Clinical Testing Agreement lies exclusively with the City and any sponsor or sponsors of the research are entitled to no more than a nonexclusive, royalty-free license to use any product developed as a result of work done pursuant to the Research or Clinical Testing Agreement. For purposes of the foregoing, a “license” includes rights granted to the United States under the Bayh-Dole Act (35 U.S.C. § 200 et seq) and the “qualified license requirement” is met with respect to such a license so long as the City determines the research to be performed and the manner in which it is to be performed under the Research or Clinical Testing Agreement.

“Qualified Clinical Testing Agreement” means any Research or Clinical Testing Agreement that is not a Qualified Basic Research Agreement that (1) the performance of which is related to the City’s governmental purposes and not an unrelated trade or business use of the Financed Facility by the City and (2) does not give any Non-Qualified User exclusive or priority rights to use all or any portion of the Financed Facility.

“Qualified Equity” means funds that are not derived from proceeds of a tax-exempt financing that are spent on the Project at any time during the period beginning not earlier than the later of (a) 60 days prior to the Official Intent Date or (b) three years prior to the Issue Date and ending not later than the date the Project is capable of and actually used at substantially its designed level. Qualified Equity excludes an ownership interest in real property or tangible personal property.

“Qualified Use Agreement” means any of the following:

(a) A lease or other short-term use by members of the general public who occupy the Financed Facility on a short-term basis in the ordinary course of the City’s governmental purposes.

(b) Agreements with Qualified Users or Non-Qualified Users to use all or a portion of the Financed Facility for a period up to 200 days in length pursuant to an arrangement whereby (1) the use of the Financed Facility under the same or similar arrangements is predominantly by natural persons who are not engaged in a trade or business and (2) the compensation for the use is determined based on generally applicable, fair market value rates that are in effect at the time the agreement is entered into or renewed. Any Qualified User or Non-Qualified User using all or any portion of the Financed Facility under this type of arrangement may have a right of first refusal to renew the agreement at rates generally in effect at the time of the renewal.

(c) Agreements with Qualified Users or Non-Qualified Users to use all or a portion of the Financed Facility for a period up to 100 days in length pursuant to arrangements whereby (1) the use of the property by the person would be general public use but for the fact that generally

applicable and uniformly applied rates are not reasonably available to natural persons not engaged in a trade or business, (2) the compensation for the use under the arrangement is determined based on applicable, fair market value rates that are in effect at the time the agreement is entered into or renewed, and (3) the Financed Facility was not constructed for a principal purpose of providing the property for use by that Qualified User or Non-Qualified User. Any Qualified User or Non-Qualified User using all or any portion of the Financed Facility under this type of arrangement may have a right of first refusal to renew the agreement at rates generally in effect at the time of the renewal.

(d) Agreements with Qualified Users or Non-Qualified Users to use all or a portion of the Financed Facility for a period up to 50 days in length pursuant to a negotiated arm's-length arrangement at fair market value so long as the Financed Facility was not constructed for a principal purpose of providing the property for use by that person.

“Qualified User” means a State, territory, possession of the United States, the District of Columbia, or any political subdivision thereof, or any instrumentality of such entity, but it does not include the United States or any agency or instrumentality of the United States.

“Reasonable Retainage” means Gross Proceeds retained by the City for reasonable business purposes, such as to ensure or promote compliance with a construction contract; provided that such amount may not exceed (a) for purposes of the 18-month spending test, 5% of net sale proceeds of the Bonds on the date 18 months after the Issue Date, or (b) for purposes of the 2-year spending test, 5% of the Available Construction Proceeds as of the end of the 2-year spending period.

“Rebate Analyst” means Gilmore & Bell, P.C. or any successor Rebate Analyst selected pursuant to this Tax Certificate.

“Rebate Fund” means the Rebate Fund established under the Ordinance.

“Regulations” means all Regulations issued by the U.S. Treasury Department to implement the provisions of Code §§ 103 and 141 through 150 and applicable to the Bonds.

“Research or Clinical Testing Agreement” means any agreement or other contractual arrangement with a Non-Qualified User (including the United States or its agencies) pursuant to which KCCAC will perform services at or otherwise use the Financed Facility, if such agreement or contract can reasonably be expected to involve (a) the advancement of scientific knowledge (including the social sciences), (b) the development or testing of a commercial product (including but not limited to clinical drug studies required by the FDA), or (c) the creation of patentable intellectual property.

“Series 2020A Special Obligation Bonds” means the City's \$11,380,000 Taxable Special Obligation Bonds (Kansas City, Missouri Projects) Series 2020A.

“Series 2020B Special Obligation Bonds” means the City's \$7,305,000 Special Obligation Bonds (Kansas City, Missouri Projects) Series 2020B.

“Tax Certificate” means this Federal Tax Certificate as it may from time to time be amended and supplemented in accordance with its terms.

“Tax Compliance Procedure” means the City's Maintenance of Municipal Bonds and Master Lease Purchase Agreements policy and procedure, dated July 1, 2012.

“**Tax-Exempt Bond File**” means documents and records for the Bonds, maintained by the Bond Compliance Officer pursuant to the Tax Compliance Procedure.

“**Transcript**” means the Transcript of Proceedings relating to the authorization and issuance of the Bonds.

“**Underwriter**” means Barclays Capital Inc., as representative of the underwriters of the Bonds.

“**Yield**” means yield on the Bonds, computed under Regulations § 1.148-4, and yield on an Investment, computed under Regulations § 1.148-5.

ARTICLE II

GENERAL REPRESENTATIONS AND COVENANTS

Section 2.1. Representations and Covenants of the City. The City represents and covenants as follows:

(a) *Organization and Authority.* The City (1) is a political subdivision organized and existing under the laws of the State of Missouri, and (2) has lawful power and authority to issue the Bonds for the purposes set forth in the Ordinance, to enter into, execute and deliver the Ordinance, the Bonds, and this Tax Certificate and to carry out its obligations under this Tax Certificate and under such documents, and (3) by all necessary action has been duly authorized to execute and deliver the Ordinance, the Bonds, and this Tax Certificate, acting by and through its duly authorized officials.

(b) *Tax-Exempt Status of Bonds—General Covenant and Allocation of Proceeds to Project.*

(1) The City (to the extent within its power or direction) will not use any money on deposit in any fund or account maintained in connection with the Bonds, whether or not such money was derived from the proceeds of the sale of the Bonds or from any other source, in a manner that would cause the Bonds to be “arbitrage bonds,” within the meaning of Code § 148, and will not (to the extent within its power or direction) otherwise use or permit the use of any Bond proceeds or any other funds of the City, directly or indirectly, in any manner, or take or permit to be taken any other action or actions, that would cause interest on the Bonds to be included in gross income for federal income tax purposes.

(2) The City will account for the expenditure of the Bond proceeds and Qualified Equity for the Project as described in **Section 4.2** of this Tax Certificate. For purposes of the following covenants related to the use of the Financed Facility portion of the Project, any Non-Qualified Use shall be treated as first allocated entirely to the portion of the Project financed with Qualified Equity.

(c) *Governmental Obligations—Private Security or Payment.*

(1) The City will not permit more than 10% of the principal and interest on the Bonds to be (under the terms of the Bonds or any underlying arrangement) directly or indirectly:

(A) secured by (i) any interest in property used or to be used for a Non-Qualified Use, or (ii) any interest in payments in respect of such property; or

(B) derived from payments (whether or not such payments are made to the City) in respect of property, or borrowed money, used or to be used for a Non-Qualified Use.

(2) For purposes of the forgoing, taxes of general application, including payments in lieu of taxes, are not treated as private payments or as private security.

(3) In addition, for purposes of the forgoing, payments derived from operation of the portion of the Project representing the Animal Shelter in a Non-Qualified Use (including any Non-Qualified Use of the Animal Shelter resulting from use of the Animal Shelter by KCCAC or the Kanas City Pet Project) that directly or indirectly are paid to or benefit the City are included in determining whether the 10% limitation has been exceeded (the “Private Payment Limit”). However, to the extent payments derived from the operation of the Animal Shelter in a Non-Qualified Use do not exceed the operating expenditures incurred and paid with respect to the Animal Shelter, the payments are not counted against the Private Payment Limit. On an annual basis, the City agrees to maintain books and records sufficient to substantiate (A) the amount of revenue received from operation of the Animal Shelter and (ii) the amount of operating expenses related to the Animal Shelter. Based on this information, the City will consult with Bond Counsel if revenues from operation of the Animal Shelter are expected or actually exceed operating expenses in order to ensure compliance with the requirements of this **Section 2.1(c)**.

(d) *No Private Loan.* Not more than 5% of the net proceeds of the Bonds will be loaned directly or indirectly to any Non-Qualified User.

(e) *Management or Service Agreements.* As of the Issue Date, the City has no Management Agreements with Non-Qualified Users with respect to the Project. KCCAC has entered into a Management or Service Agreement with Kansas City Pet Project with respect to the Animal Shelter. However, the City does not expect any private payment or security with respect to the Animal Shelter for the reasons described in **Section 2.1(c)** of this Tax Certificate. During the Measurement Period, the City will not enter into or renew any Management or Service Agreement with any Non-Qualified User without first consulting with Bond Counsel.

(f) *Leases.* As of the Issue Date, the City entered into a lease with KCCAC with respect to the Animal Shelter (the “Animal Shelter Lease”). The City does not expect any private payment or security with respect to the Animal Shelter for the reasons described in **Section 2.1(c)** of this Tax Certificate. Except for the Animal Shelter Lease, as of the Issue Date, the City does not expect to enter into any leases of any portion of the Financed Facility other than Qualified Use Agreements during the Measurement Period. During the Measurement Period, the City will not enter into or renew any lease or similar agreement or arrangement other than a Qualified Use Agreement without first consulting with Bond Counsel.

(g) *Limit on Maturity of Bonds.* A list of the assets included in the Project and a computation of the “average reasonably expected economic life” is attached to this Tax Certificate as **Exhibit D**. Based on this computation, the “average maturity” of the Bonds as computed by Bond Counsel, does not exceed the average reasonably expected economic life of the Financed Facility.

(h) *Expenditure of Bond Proceeds.*

(1) General. The City will evidence each allocation of the proceeds of the Bonds and Qualified Equity for the Project to an expenditure in writing. No allocation will be made more than 18 months following the later of (i) the date of the expenditure or (ii) the date the Financed Facility was placed in service.

(2) Reimbursement of Expenditures; Official Intent. On the Official Intent Date, the City acting through the City Council adopted ordinances declaring the intent of the City to finance the Financed Facility with tax-exempt bonds and to reimburse the City for expenditures made for the Financed Facility prior to the issuance of the Bonds. Copies of these ordinances are attached to this Tax Certificate as **Exhibit C**. \$24,942,642.30 of the proceeds of the Bonds will be allocated to expenditures paid by the City prior to the Issue Date and should be shown on line 45a of Form 8038-G. No portion of the Net Proceeds of the Bonds will be used to reimburse an expenditure paid by the City more than 60 days prior to the date the ordinances were adopted. No reimbursement allocation will be made for an expenditure made more than 3 years before the date of the reimbursement allocation.

(3) Compliance Account. Except as provided in this paragraph (3), the City may allocate Bond proceeds held in the Compliance Account to pay fees and expenses relating to compliance with federal arbitrage law, state or federal securities laws, and other costs or expenses of carrying or repaying the Bonds. The City expects that all amounts in the Compliance Account will be allocated to expenditures within six years after the Issue Date. If any money remains in the Compliance Account on the sixth anniversary of the Issue Date, the City will transfer that money to the Debt Service Fund and use it to pay principal or interest on the Bonds.

(i) *Registration Requirement.* The Ordinance requires that all of the Bonds will be issued and held in registered form within the meaning of Code § 149(a).

(j) *Bonds Not Federally Guaranteed.* The City will not take any action or permit any action to be taken which would cause any Bond to be “federally guaranteed” within the meaning of Code § 149(b).

(k) *IRS Form 8038-G.* Bond Counsel will prepare Form 8038-G (Information Return for Tax-Exempt Governmental Obligations) based on the representations and covenants of the City contained in this Tax Certificate or otherwise provided by the City. Bond Counsel will sign the return as a paid preparer following completion and will then deliver copies to the City for execution and for the City’s records. The City agrees to timely execute and return to Bond Counsel the execution copy of Form 8038-G for filing with the IRS. A copy of the “as-filed” copy along with proof of filing will be included as **Exhibit B**. The City has allocated \$24,942,642.30 of the Net Proceeds of the Bonds to reimburse expenditures made prior to the Issue Date and that amount should be reflected on Line 45a of Form 8038-G. A list of expenditures to be reimbursed is included as part of **Exhibit D**.

(l) *Hedge Bonds.* At least 85% of the net sale proceeds (the sale proceeds of the Bonds less any sale proceeds invested in a reserve fund) of the Bonds will be used to carry out the governmental purpose of the Bonds within 3 years after the Issue Date, and not more than 50% of the proceeds of the Bonds will be invested in Investments having a substantially guaranteed Yield for 4 years or more.

(m) *Compliance with Future Tax Requirements.* The City understands that the Code and the Regulations may impose new or different restrictions and requirements on the City in the future. The City

will comply with such future restrictions that are necessary to maintain the exclusion of the interest on the Bonds from gross income for federal income tax purposes.

(n) *Single Issue; No Other Issues.* The Bonds constitute a single “issue” under Regulations § 1.150-1(c). The Series 2020A Special Obligation Bonds and Series 2020B Special Obligation Bonds are being sold within 15 days of the Bonds but constitute separate issues from the Bonds because the Series 2020A Special Obligation Bonds and Series 2020B Special Obligation Bonds are being issued under a separate plan of finance and interest on the Series 2020A Special Obligation Bonds is includable in gross income for federal income tax purposes. No debt obligations of the City are being sold within 15 days of the sale of the Bonds, under the same plan of financing as the Bonds, and expected to be paid from substantially the same source of funds as the Bonds (disregarding guarantees from unrelated parties, such as bond insurance).

(o) *Interest Rate Swap.* As of the Issue Date, the City has not entered into an interest rate swap agreement or any other similar arrangement designed to modify its interest rate risk with respect to the Bonds. The City will not enter into any such arrangement in the future without first consulting with Bond Counsel.

(p) *Guaranteed Investment Contract.* As of the Issue Date, the City does not expect to enter into a Guaranteed Investment Contract for any Gross Proceeds of the Bonds. The City will be responsible for complying with **Section 4.4(d)** if it decides to enter into a Guaranteed Investment Contract at a later date

(q) *Bank Qualified Tax-Exempt Obligation.* The Bonds are not “qualified tax-exempt obligations” under Code § 265(b)(3).

Section 2.2. Survival of Representations and Covenants. All representations, covenants and certifications contained in this Tax Certificate or in any certificate or other instrument delivered by the City under this Tax Certificate, will survive the execution and delivery of such documents and the issuance of the Bonds, as representations of facts existing as of the date of execution and delivery of the instruments containing such representations. The foregoing covenants of this Section will remain in full force and effect notwithstanding the defeasance of the Bonds.

ARTICLE III

ARBITRAGE CERTIFICATIONS AND COVENANTS

Section 3.1. General. The purpose of this **Article III** is to certify, under Regulations § 1.148-2(b), the City’s expectations as to the sources, uses and investment of Bond proceeds and other money, in order to support the City’s conclusion that the Bonds are not arbitrage bonds. The person executing this Tax Certificate on behalf of the City is an officer of the City responsible for issuing the Bonds.

Section 3.2. Reasonable Expectations. The facts, estimates and expectations set forth in this **Article III** are based upon and in reliance upon the City’s understanding of the documents and certificates that comprise the Transcript, and the representations, covenants and certifications of the parties contained therein. To the City’s knowledge, the facts and estimates set forth in this Tax Certificate are accurate, and the expectations of the City set forth in this Tax Certificate are reasonable. The City has no knowledge that would cause it to believe that the representations, warranties and certifications described in this Tax Certificate are unreasonable or inaccurate or may not be relied upon.

Section 3.3. Purposes of the Financing. The Bonds are being issued for the purpose of providing funds to finance certain Project costs.

Section 3.4. Funds and Accounts. The following funds and accounts have been established under the Ordinance:

- Project Fund;
- Costs of Issuance Fund;
- Debt Service Fund;
- Compliance Account; and
- Rebate Fund.

Section 3.5. Amount and Use of Bond Proceeds and Other Money.

(a) *Amount of Bond Proceeds.* The total proceeds to be received by the City from the sale of the Bonds will be as follows:

Principal Amount	\$43,360,000.00
Net Original Issue Premium	8,685,032.70
Less Underwriting Discount	<u>(197,394.85)</u>
Total Proceeds Received by City	\$51,847,637.85

(b) *Use of Bond Proceeds.* The Bond proceeds are expected to be allocated to expenditures as follows:

(1) \$216,211.85 will be deposited in the Costs of Issuance Fund and will be used to pay Costs of Issuance.

(2) \$51,621,426.00 will be deposited in the Project Fund, of which (a) \$25,971,600.00 will be deposited into the Street, Sidewalk and Bridge Project Account, (b) \$13,143,826.00 will be deposited into the Flood Control Project Account, and (c) \$12,506,000.00 will be deposited into the Public Buildings Project Account.

(3) \$10,000.00 will be deposited in the Compliance Account and used to pay the costs of post-issuance compliance for the Bonds through no later than five years after the Issue Date.

Section 3.6. Multipurpose Issue. [Reserved].

Section 3.7. No Current Refunding. No proceeds of the Bonds will be used to pay principal of or interest on any other debt obligation.

Section 3.8. Project Completion. The City has incurred, or will incur within 6 months after the Issue Date, a substantial binding obligation to a third party to spend at least 5% of the Net Proceeds of the Bonds on the Financed Facility. The completion of the Financed Facility and the allocation of the Net Proceeds of the Bonds to expenditures will proceed with due diligence. At least 85% of the Net Proceeds of the Bonds will be allocated to expenditures on the Financed Facility within 3 years after the Issue Date.

Section 3.9. Sinking Funds. The City is required to make periodic payments in amounts sufficient to pay the principal of and interest on the Bonds. These payments will be deposited into the Debt Service Fund. Except for the Debt Service Fund, no sinking fund or other similar fund that is expected to be used to pay principal of or interest on the Bonds has been established or is expected to be established. The Debt Service Fund is used primarily to achieve a proper matching of revenues with principal and interest payments on the Bonds within each Bond Year, and the City expects that the Debt Service Fund will qualify as a Bona Fide Debt Service Fund.

Section 3.10. Reserve, Replacement and Pledged Funds.

(a) *Debt Service Reserve Fund.* No reserve or replacement fund has been established for the Bonds.

(b) *No Other Replacement or Pledged Funds.* None of the Bond proceeds will be used as a substitute for other funds that were intended or earmarked to pay costs of the Financed Facility, and that instead has been or will be used to acquire higher yielding Investments. Except for the Debt Service Fund, there are no other funds pledged or committed in a manner that provides a reasonable assurance that such funds would be available for payment of the principal of or interest on the Bonds if the City encounters financial difficulty.

(c) *Compliance Account.* Amounts held in the Compliance Account are expected to be used to pay fees and expenses relating to compliance with federal arbitrage law, state or federal securities laws, and other costs or expenses of carrying or repaying the Bonds. Therefore, amounts held in the Compliance Account are not pledged or committed in a manner that provides a reasonable assurance that such funds would be available for payment of the principal of or interest on the Bonds if the City encounters financial difficulty.

Section 3.11. Purpose Investment Yield. The proceeds of the Bonds will not be used to purchase an Investment for the purpose of carrying out the governmental purpose of the financing.

Section 3.12. Issue Price and Yield on Bonds.

(a) *Issue Price.* Based on the Underwriter's certifications in the Issue Certificate, the City hereby elects to establish the issue prices of the Bonds pursuant to Regulations § 1.148-1(f)(2)(ii) (relating to the so-called "hold-the-offering-price rule"). Therefore, the aggregate issue price of the Bonds for such purpose is \$52,045,032.70.

(b) *Bond Yield.* Based on the issue price, the Yield on the Bonds is 1.77119%, as computed by Bond Counsel as shown on **Exhibit A**. The City has not entered into an interest rate swap agreement with respect to any portion of the proceeds of the Bonds.

Section 3.13. Miscellaneous Arbitrage Matters.

(a) *No Abusive Arbitrage Device.* The Bonds are not and will not be part of a transaction or series of transactions that has the effect of (1) enabling the City to exploit the difference between tax-exempt and taxable interest rates to gain a material financial advantage, and (2) overburdening the tax-exempt bond market.

(b) *No Over-Issuance.* The sale proceeds of the Bonds, together with expected Investment earnings thereon and other money contributed by the City, do not exceed the cost of the governmental purpose of the Bonds as described above.

Section 3.14. Conclusion. On the basis of the facts, estimates and circumstances set forth in this Tax Certificate, the City does not expect that the Bond proceeds will be used in a manner that would cause any Bond to be an “arbitrage bond” within the meaning of Code § 148 and the Regulations.

ARTICLE IV

POST-ISSUANCE TAX REQUIREMENTS, POLICIES AND PROCEDURES

Section 4.1. General.

(a) *Purpose of Article.* The purpose of **Article IV** is to supplement the Tax Compliance Procedure and to set out specific policies and procedures governing compliance with the federal income tax requirements that apply after the Bonds are issued. The City recognizes that interest on the Bonds will remain excludable from gross income only if the Post-Issuance Tax Requirements are followed after the Issue Date. The City further acknowledges that written evidence substantiating compliance with the Post-Issuance Tax Requirements must be retained in order to permit the Bonds to be refinanced with tax-exempt obligations and substantiate the position that interest on the Bonds is exempt from gross income in the event of an audit of the Bonds by the IRS.

(b) *Written Policies and Procedures of the City.* The City intends for the Tax Compliance Procedure, as supplemented by this Tax Certificate, to be its primary written policies and procedures for monitoring compliance with the Post-Issuance Tax Requirements for the Bonds and to supplement any other formal policies and procedures related to tax compliance that the City has established. The provisions of this Tax Certificate are intended to be consistent with the Tax Compliance Procedure. In the event of any inconsistency between the Tax Compliance Procedure and this Tax Certificate, the terms of this Tax Certificate will govern.

(c) *Bond Compliance Officer.* The City when necessary to fulfill its Post-Issuance Tax Requirements will, through its Bond Compliance Officer, sign Form 8038-T in connection with the payment of arbitrage rebate or Yield reduction amounts, participate in any federal income tax audit of the Bonds or related proceedings under a voluntary compliance agreement procedures (VCAP) or undertake a remedial action procedure pursuant to Regulations § 1.141-12. In each case, all costs and expenses incurred by the City shall be treated as a reasonable cost of administering the Bonds and the City shall be entitled to reimbursement and recovery of its costs to the same extent as provided in the Ordinance or State law.

Section 4.2. Record Keeping; Use of Bond Proceeds and Use of Financed Facilities.

(a) *Record Keeping.* The Bond Compliance Officer will maintain the Tax-Exempt Bond File for the Bonds in accordance with the Tax Compliance Procedure. Unless otherwise specifically instructed in advice or a written Opinion of Bond Counsel or to the extent otherwise provided in this Tax Certificate, the Bond Compliance Officer shall retain records related to the Post-Issuance Tax Requirements until 3 years following the final maturity of (1) the Bonds or (2) any obligation issued to refund the Bonds. Any records maintained electronically must comply with Section 4.01 of Revenue Procedure 97-22, which generally provides that an electronic storage system must (i) ensure an accurate and complete transfer of the hardcopy records which indexes, stores, preserves, retrieves and reproduces the electronic records, (ii)

include reasonable controls to ensure integrity, accuracy and reliability of the electronic storage system and to prevent unauthorized alteration or deterioration of electronic records, (iii) exhibit a high degree of legibility and readability both electronically and in hardcopy, (iv) provide support for other books and records of the City and (v) not be subject to any agreement that would limit the ability of the IRS to access and use the electronic storage system on the City's premises.

(b) *Accounting and Allocation of Bond Proceeds and Qualified Equity to Expenditures.* The Bond Compliance Officer will account for the investment and expenditure of Bond proceeds in the level of detail required by the Tax Compliance Procedure. The Bond Compliance Officer will supplement the expected allocation of Bond proceeds and Qualified Equity to expenditures with a Final Written Allocation as required by the Tax Compliance Procedure. A sample form of Final Written Allocation is attached as **Exhibit G**.

(c) *Annual Compliance Checklist.* Attached as **Exhibit E** is a sample Annual Compliance Checklist for the Bonds. The Bond Compliance Officer will prepare and complete an Annual Compliance Checklist for the Financed Facility at least annually in accordance with the Tax Compliance Procedure. If the Annual Compliance Checklist identifies a deficiency in compliance with the requirements of this Tax Certificate, the Bond Compliance Officer will take the actions identified in advice of Bond Counsel or as described in the Tax Compliance Procedure to correct any deficiency.

(d) *Advice and Opinions of Bond Counsel.* The Bond Compliance Officer is responsible for obtaining and delivering to the City any advice or Opinion of Bond Counsel required under the provisions of this Tax Certificate, including any advice or Opinion of Bond Counsel required by this Tax Certificate or the Annual Compliance Checklist.

Section 4.3. Temporary Periods/Yield Restriction. Except as described below, the City will not invest Gross Proceeds at a Yield greater than the Yield on the Bonds:

(a) *Project Fund and Cost of Issuance Fund.* Bond proceeds deposited in the Project Fund and Cost of Issuance Fund and Investment earnings on those proceeds may be invested without Yield restriction for up to 3 years following the Issue Date. If any unspent proceeds remain in those funds after 3 years, those amounts may continue to be invested without Yield restriction so long as the City pays to the IRS all Yield reduction payments in accordance with Regulations § 1.148-5(c). These payments are required whether or not the Bonds are exempt from the arbitrage rebate and Yield reduction amounts requirements of Code § 148.

(b) *Debt Service Fund.* To the extent that the Debt Service Fund qualifies as a Bona Fide Debt Service Fund, money in such account may be invested without Yield restriction for 13 months after the date of deposit. Earnings on such amounts may be invested without Yield restriction for 1 year after the date of receipt of such earnings.

(c) *Rebate Fund and Compliance Account.* Sale proceeds of the Bonds on deposit in the Compliance Account may not be invested above the Yield on the Bonds without first obtaining advice or an Opinion of Bond Counsel. Money other than sale proceeds or Investment proceeds of the Bonds on deposit in the Rebate Fund and Compliance Account may be invested without Yield restriction.

(d) *Minor Portion.* In addition to the amounts described above, Gross Proceeds not exceeding the Minor Portion may be invested without Yield restriction.

Section 4.4. Procedures for Establishing Fair Market Value.

(a) *General.* No Investment may be acquired with Gross Proceeds for an amount (including transaction costs) in excess of the fair market value of such Investment, or sold or otherwise disposed of for an amount (including transaction costs) less than the fair market value of the Investment. The fair market value of any Investment is the price a willing buyer would pay to a willing seller to acquire the Investment in a bona fide, arm's-length transaction. Fair market value will be determined in accordance with Regulations § 1.148-5.

(b) *Established Securities Market.* Except for Investments purchased for a Yield-restricted defeasance escrow, if an Investment is purchased or sold in an arm's-length transaction on an established securities market (within the meaning of Code § 1273), the purchase or sale price constitutes the fair market value. Where there is no established securities market for an Investment, market value must be established using 1 of the paragraphs below. The fair market value of Investments purchased for a Yield-restricted defeasance escrow must be determined in a bona fide solicitation for bids that complies with Regulations § 1.148-5.

(c) *Certificates of Deposit.* The purchase price of a certificate of deposit (a "CD") is treated as its fair market value on the purchase date if (1) the CD has a fixed interest rate, a fixed payment schedule, and a substantial penalty for early withdrawal, (2) the Yield on the CD is not less than the Yield on reasonably comparable direct obligations of the United States, and (3) the Yield is not less than the highest Yield published or posted by the CD issuer to be currently available on reasonably comparable CDs offered to the public.

(d) *Guaranteed Investment Contracts.* The City is applying Regulations § 1.148-5(d)(6)(iii)(A) to the Bonds. The purchase price of a Guaranteed Investment Contract is treated as its fair market value on the purchase date if all of the following requirements are met:

(1) Bona Fide Solicitation for Bids. The City makes a bona fide solicitation for the Guaranteed Investment Contract, using the following procedures:

(i) The bid specifications are in writing and are timely forwarded to potential providers, or are made available on an internet website or other similar electronic media that is regularly used to post bid specifications to potential bidders. A writing includes a hard copy, a fax, or an electronic e-mail copy.

(ii) The bid specifications include all "material" terms of the bid. A term is material if it may directly or indirectly affect the Yield or the cost of the Guaranteed Investment Contract.

(iii) The bid specifications include a statement notifying potential providers that submission of a bid is a representation (A) that the potential provider did not consult with any other potential provider about its bid, (B) that the bid was determined without regard to any other formal or informal agreement that the potential provider has with the City or any other person (whether or not in connection with the bond issue), and (C) that the bid is not being submitted solely as a courtesy to the City or any other person, for purposes of satisfying the requirements of the Regulations.

(iv) The terms of the bid specifications are “commercially reasonable.” A term is commercially reasonable if there is a legitimate business purpose for the term other than to increase the purchase price or reduce the yield of the Guaranteed Investment Contract.

(v) The terms of the solicitation take into account the City’s reasonably expected deposit and draw-down schedule for the amounts to be invested.

(vi) All potential providers have an equal opportunity to bid. If the bidding process affords any opportunity for a potential provider to review other bids before providing a bid, then providers have an equal opportunity to bid only if all potential providers have an equal opportunity to review other bids. Thus, no potential provider may be given an opportunity to review other bids that is not equally given to all potential providers (that is no exclusive “last look”).

(vii) At least 3 “reasonably competitive providers” are solicited for bids. A reasonably competitive provider is a provider that has an established industry reputation as a competitive provider of the type of Investments being purchased.

(2) Bids Received. The bids received must meet all of the following requirements:

(i) At least 3 bids are received from providers that were solicited as described above and that do not have a “material financial interest” in the issue. For this purpose, (A) a lead underwriter in a negotiated underwriting transaction is deemed to have a material financial interest in the issue until 15 days after the Issue Date of the issue, (B) any entity acting as a financial advisor with respect to the purchase of the Guaranteed Investment Contract at the time the bid specifications are forwarded to potential providers has a material financial interest in the issue, and (C) a provider that is a related party to a provider that has a material financial interest in the issue is deemed to have a material financial interest in the issue.

(ii) At least 1 of the 3 bids received is from a reasonably competitive provider, as defined above.

(iii) If an agent or broker is used to conduct the bidding process, the agent or broker did not bid to provide the Guaranteed Investment Contract.

(3) Winning Bid. The winning bid is the highest yielding bona fide bid (determined net of any broker’s fees).

(4) Fees Paid. The obligor on the Guaranteed Investment Contract certifies the administrative costs that it pays (or expects to pay, if any) to third parties in connection with supplying the Guaranteed Investment Contract.

(5) Records. The City retains the following records with the Bond documents until 3 years after the last outstanding Bond is redeemed:

(i) A copy of the Guaranteed Investment Contract.

(ii) The receipt or other record of the amount actually paid for the Guaranteed Investment Contract, including a record of any administrative costs paid by the City, and the certification as to fees paid, described in paragraph (d)(4) above.

(iii) For each bid that is submitted, the name of the person and entity submitting the bid, the time and date of the bid, and the bid results.

(iv) The bid solicitation form and, if the terms of Guaranteed Investment Contract deviated from the bid solicitation form or a submitted bid is modified, a brief statement explaining the deviation and stating the purpose for the deviation.

(e) *Other Investments.* If an Investment is not described above, the fair market value may be established through a competitive bidding process, as follows:

(1) at least 3 bids on the Investment must be received from persons with no financial interest in the Bonds (*e.g.*, as underwriters or brokers); and

(2) the Yield on the Investment must be equal to or greater than the Yield offered under the highest bid.

Section 4.5. Certain Gross Proceeds Exempt from the Rebate Requirement.

(a) *General.* A portion of the Gross Proceeds of the Bonds may be exempt from rebate pursuant to one or more of the following exceptions. The exceptions typically will not apply with respect to all Gross Proceeds of the Bonds and will not otherwise affect the application of the Investment limitations described in **Section 4.3**. Unless specifically noted, the obligation to compute, and if necessary, to pay rebate as set forth in **Section 4.6** applies even if a portion of the Gross Proceeds of the Bonds is exempt from the rebate requirement. To the extent all or a portion of the Bonds is exempt from rebate the Rebate Analyst may account for such fact in connection with its preparation of a rebate report described in **Section 4.6**. The City may defer the final rebate Computation Date and the payment of rebate for the Bonds to the extent permitted by Regulations §§ 1.148-7(b)(1) and 1.148-3(e)(2) but only in accordance with specific written instructions provided by the Rebate Analyst.

(b) *Applicable Spending Exceptions.*

(1) The City expects that at least 75% of the Available Construction Proceeds will be used for construction or rehabilitation expenditures for property owned by the City.

(2) The following optional rebate spending exceptions can apply to the Bonds:

- 6-month spending exception (Code § 148(f)(4)(B) and Regulations § 1.148-7(c)).
- 18-month spending exception (Regulations § 1.148-7(d)).
- 2-year spending exception (Code § 148(f)(4)(C) and Regulations § 1.148-7(e)).

(3) The City expects to earn approximately \$23,000 in Investment earnings on Bond proceeds in the Project Fund.

(c) *Special Elections Made with Respect to Spending Exception Elections* No special elections are being made in connection with the application of the spending exceptions.

(d) *Bona Fide Debt Service Fund.* To the extent that the Debt Service Fund qualifies as a Bona Fide Debt Service Fund, Investment earnings in the fund cannot be taken into account in computing arbitrage rebate and yield reduction amounts (1) with respect to such portion that meets the 6-month, 18-month or 2-year spending exception, or (2) for a given Bond Year, if the gross earnings on the Debt Service Fund for such Bond Year are less than \$100,000. If the average annual debt service on the Bonds does not exceed \$2,500,000, the \$100,000 earnings test may be treated as satisfied in every Bond Year.

(e) *Documenting Application of Spending Exception.* At any time prior to the first Computation Date, the City may engage the Rebate Analyst to determine whether one or more spending exceptions has been satisfied, and the extent to which the City must continue to comply with **Section 4.6** of this Tax Certificate.

(f) *General Requirements for Spending Exception.* The following general requirements apply in determining whether a spending exception is met.

(1) Using Adjusted Gross Proceeds or Available Construction Proceeds to pay principal of any Bonds is not taken into account as an expenditure for purposes of meeting any of the spending tests.

(2) The 6-month spending exception generally is met if all Adjusted Gross Proceeds of the Bonds are spent within 6 months following the Issue Date. The test may still be satisfied even if up to 5% of the sale proceeds remain at the end of the initial 6-month period, so long as this amount is spent within 1 year of the Issue Date.

(3) The 18-month spending exception generally is met if all Adjusted Gross Proceeds of the Bonds are spent in accordance with the following schedule:

Time Period After the Issue Date	Minimum Percentage of Adjusted Gross Proceeds Spent
6 months	15%
12 months	60%
18 months (Final)	100%

(4) The 2-year spending exception generally is met if all Available Construction Proceeds are spent in accordance with the following schedule:

Time Period After the Issue Date	Minimum Percentage of Available Construction Proceeds Spent
6 months	10%
12 months	45%
18 months	75%
24 months (Final)	100%

(5) For purposes of applying the 18-month and 2-year spending exceptions only, the failure to satisfy the **final** spending requirement is disregarded if the City uses due diligence to complete the Financed Facility and the failure does not exceed the lesser of 3% of the aggregate issue price the Bonds or \$250,000. **No such exception applies for any other spending period.**

(6) For purposes of applying the 18-month and 2-year spending exceptions only, the Bonds meet the applicable spending test even if, at the end of the **final** spending period, proceeds not exceeding a Reasonable Retainage remain unspent, so long as such Reasonable Retainage is spent within 30 months after the Issue Date in the case of the 18-month exception or 3 years after the Issue Date in the case of the 2-year spending exception.

Section 4.6. Computation and Payment of Arbitrage Rebate and Yield Reduction Amounts.

(a) *Rebate Fund.* The City will keep the Rebate Fund separate from all other funds and will administer the Rebate Fund under this Tax Certificate. Any Investment earnings derived from the Rebate Fund will be credited to the Rebate Fund, and any Investment loss will be charged to the Rebate Fund.

(b) *Computation of Rebate Amount.* The City will provide the Rebate Analyst Investment reports relating to each fund held by it that contains Gross Proceeds of the Bonds together with copies of Investment reports for any funds containing Gross Proceeds that are held by a party other than the City annually as of the end of each Bond Year and not later than 10 days following each Computation Date. Each Investment report provided to the Rebate Analyst will contain a record of each Investment, including (1) purchase date, (2) purchase price, (3) information establishing the fair market value on the date such Investment was allocated to the Bonds, (4) any accrued interest paid, (5) face amount, (6) coupon rate, (7) frequency of interest payments, (8) disposition price, (9) any accrued interest received, and (10) disposition date. These records may be supplied in electronic form. The Rebate Analyst will compute rebate following each Computation Date and deliver a written report to the City together with an opinion or certificate of the Rebate Analyst stating that arbitrage rebate and yield reduction amounts were determined in accordance with the Regulations. Each report and opinion will be provided not later than 45 days following the Computation Date to which it relates. In performing its duties, the Rebate Analyst may rely, in its discretion, on the correctness of financial analysis reports prepared by other professionals.

(c) *Rebate Payments.* Within 60 days after each Computation Date, the City will pay to the United States the rebate and Yield reduction amount then due, determined in accordance with the Regulations. Each payment must be (1) accompanied by IRS Form 8038-T and such other forms, documents or certificates as may be required by the Regulations, and (2) mailed or delivered to the IRS at the address shown below, or to such other location as the IRS may direct:

Internal Revenue Service Center
Ogden, UT 84201

(d) *Successor Rebate Analyst.* If the firm acting as the Rebate Analyst resigns or becomes incapable of acting for any reason, or if the City desires that a different firm act as the Rebate Analyst, then the City by an instrument or concurrent instruments in writing delivered to the firm then serving as the Rebate Analyst and any other party to this Tax Certificate, will name a successor Rebate Analyst. In each case the successor Rebate Analyst must be a firm of nationally recognized bond counsel or a firm of independent certified public accountants and such firm must expressly agree to undertake the responsibilities assigned to the Rebate Analyst hereunder.

(e) *Filing Requirements.* The City will file or cause to be filed with the IRS such reports or other documents as are required by the Code in accordance with advice of Bond Counsel.

(f) *Survival after Defeasance.* Notwithstanding anything in the Ordinance to the contrary, the obligation to pay arbitrage rebate and yield reduction amounts to the United States will survive the payment or defeasance of the Bonds.

ARTICLE V

MISCELLANEOUS PROVISIONS

Section 5.1. Term of Tax Certificate. This Tax Certificate will be effective concurrently with the issuance and delivery of the Bonds and will continue in force and effect until the principal of, redemption premium, if any, and interest on all Bonds have been fully paid and all such Bonds are cancelled; provided that, the provisions of **Article IV** of this Tax Certificate regarding payment of arbitrage rebate and Yield reduction amounts and all related penalties and interest will remain in effect until all such amounts are paid to the United States and the provisions of **Section 4.2** relating to record keeping shall continue in force for the period described therein for records to be retained.

Section 5.2. Amendments. This Tax Certificate may be amended from time to time by the parties to this Tax Certificate without notice to or the consent of any of the Bond owners, but only if such amendment is in writing and is accompanied by an Opinion of Bond Counsel to the effect that, under then existing law, assuming compliance with this Tax Certificate as so amended such amendment will not cause interest on any Bond to be included in gross income for federal income tax purposes. No such amendment will become effective until the City receives this Opinion of Bond Counsel.

Section 5.3. Opinion of Bond Counsel. The City may deviate from the provisions of this Tax Certificate if furnished with an Opinion of Bond Counsel to the effect that the proposed deviation will not adversely affect the exclusion of interest on the Bonds from gross income for federal income tax purposes. The City will comply with any further or different instructions provided in an Opinion of Bond Counsel to the effect that the further or different instructions need to be complied with in order to maintain the validity of the Bonds or the exclusion from gross income of interest on the Bonds.

Section 5.4. Reliance. In delivering this Tax Certificate the City is making only those certifications, representations and agreements as are specifically attributed to them in this Tax Certificate. The City is not aware of any facts or circumstances which would cause it to question the accuracy of the facts, circumstances, estimates or expectations of any other party providing certifications as part of this Tax Certificate and, to the best of its knowledge, those facts, circumstances, estimates and expectations are reasonable. The City understands that its certifications will be relied upon by the law firm of Gilmore &

Bell, P.C., in rendering its opinion as to the validity of the Bonds and the exclusion from federal gross income of the interest on the Bonds.

Section 5.5. Severability. If any provision in this Tax Certificate or in the Bonds is determined to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions will not be affected or impaired.

Section 5.6. Benefit of Agreement. This Tax Certificate is binding upon the City its respective successors and assigns, and inures to the benefit of the parties to this Tax Certificate and the owners of the Bonds. Nothing in this Tax Certificate or in the Ordinance or the Bonds, express or implied, gives to any person, other than the parties to this Tax Certificate, their successors and assigns, and the owners of the Bonds, any benefit or any legal or equitable right, remedy or claim under this Tax Certificate.

Section 5.7. Default, Breach and Enforcement. Any misrepresentation of a party contained herein or any breach of a covenant or agreement contained in this Tax Certificate may be pursued by the Bond owners pursuant to the terms of the Ordinance or any other document which references this Tax Certificate and gives remedies for a misrepresentation or breach thereof.

Section 5.8. Execution in Counterparts. This Tax Certificate may be executed in any number of counterparts, each of which so executed will be deemed to be an original, but all such counterparts will together constitute the same instrument.

Section 5.9. Governing Law. This Tax Certificate will be governed by and construed in accordance with the laws of the State of Missouri.

Section 5.10. Electronic Transactions. The transaction described in this Tax Certificate may be conducted, and related documents may be sent, stored and received, by electronic means.

[Remainder of Page Intentionally Left Blank]

IN WITNESS WHEREOF, the undersigned Director of Finance of the City, by their execution of this Tax Certificate hereby make the foregoing certifications, representations, and agreements contained in this Tax Certificate on behalf of the City, as of the Issue Date of the Bonds.

CITY OF KANSAS CITY, MISSOURI

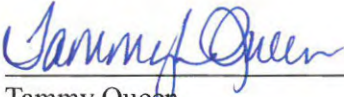
By: 
Name: Tammy Queen
Title: Director of Finance

EXHIBIT A

DEBT SERVICE SCHEDULE AND PROOF OF BOND YIELD

BOND DEBT SERVICE

City of Kansas City, Missouri
General Obligation Bonds, Series 2020A

Period Ending	Principal	Coupon	Interest	Debt Service	Annual Debt Service	Bond Balance	Total Bond Value
04/29/2020						43,360,000	43,360,000
08/01/2020			503,955.55	503,955.55		43,360,000	43,360,000
02/01/2021	1,775,000	5.000%	986,000.00	2,761,000.00	3,264,955.55	41,585,000	41,585,000
08/01/2021			941,625.00	941,625.00		41,585,000	41,585,000
02/01/2022	1,380,000	5.000%	941,625.00	2,321,625.00	3,263,250.00	40,205,000	40,205,000
08/01/2022			907,125.00	907,125.00		40,205,000	40,205,000
02/01/2023	1,450,000	5.000%	907,125.00	2,357,125.00	3,264,250.00	38,755,000	38,755,000
08/01/2023			870,875.00	870,875.00		38,755,000	38,755,000
02/01/2024	1,525,000	5.000%	870,875.00	2,395,875.00	3,266,750.00	37,230,000	37,230,000
08/01/2024			832,750.00	832,750.00		37,230,000	37,230,000
02/01/2025	1,600,000	5.000%	832,750.00	2,432,750.00	3,265,500.00	35,630,000	35,630,000
08/01/2025			792,750.00	792,750.00		35,630,000	35,630,000
02/01/2026	1,680,000	5.000%	792,750.00	2,472,750.00	3,265,500.00	33,950,000	33,950,000
08/01/2026			750,750.00	750,750.00		33,950,000	33,950,000
02/01/2027	1,760,000	5.000%	750,750.00	2,510,750.00	3,261,500.00	32,190,000	32,190,000
08/01/2027			706,750.00	706,750.00		32,190,000	32,190,000
02/01/2028	1,850,000	5.000%	706,750.00	2,556,750.00	3,263,500.00	30,340,000	30,340,000
08/01/2028			660,500.00	660,500.00		30,340,000	30,340,000
02/01/2029	1,940,000	5.000%	660,500.00	2,600,500.00	3,261,000.00	28,400,000	28,400,000
08/01/2029			612,000.00	612,000.00		28,400,000	28,400,000
02/01/2030	2,040,000	5.000%	612,000.00	2,652,000.00	3,264,000.00	26,360,000	26,360,000
08/01/2030			561,000.00	561,000.00		26,360,000	26,360,000
02/01/2031	2,145,000	5.000%	561,000.00	2,706,000.00	3,267,000.00	24,215,000	24,215,000
08/01/2031			507,375.00	507,375.00		24,215,000	24,215,000
02/01/2032	2,250,000	5.000%	507,375.00	2,757,375.00	3,264,750.00	21,965,000	21,965,000
08/01/2032			451,125.00	451,125.00		21,965,000	21,965,000
02/01/2033	2,365,000	5.000%	451,125.00	2,816,125.00	3,267,250.00	19,600,000	19,600,000
08/01/2033			392,000.00	392,000.00		19,600,000	19,600,000
02/01/2034	2,480,000	4.000%	392,000.00	2,872,000.00	3,264,000.00	17,120,000	17,120,000
08/01/2034			342,400.00	342,400.00		17,120,000	17,120,000
02/01/2035	2,580,000	4.000%	342,400.00	2,922,400.00	3,264,800.00	14,540,000	14,540,000
08/01/2035			290,800.00	290,800.00		14,540,000	14,540,000
02/01/2036	2,685,000	4.000%	290,800.00	2,975,800.00	3,266,600.00	11,855,000	11,855,000
08/01/2036			237,100.00	237,100.00		11,855,000	11,855,000
02/01/2037	2,790,000	4.000%	237,100.00	3,027,100.00	3,264,200.00	9,065,000	9,065,000
08/01/2037			181,300.00	181,300.00		9,065,000	9,065,000
02/01/2038	2,905,000	4.000%	181,300.00	3,086,300.00	3,267,600.00	6,160,000	6,160,000
08/01/2038			123,200.00	123,200.00		6,160,000	6,160,000
02/01/2039	3,020,000	4.000%	123,200.00	3,143,200.00	3,266,400.00	3,140,000	3,140,000
08/01/2039			62,800.00	62,800.00		3,140,000	3,140,000
02/01/2040	3,140,000	4.000%	62,800.00	3,202,800.00	3,265,600.00		
	43,360,000		21,938,405.55	65,298,405.55	65,298,405.55		

BOND PRICING

City of Kansas City, Missouri
General Obligation Bonds, Series 2020A

Bond Component	Maturity Date	Amount	Rate	Yield	Price	Premium (-Discount)
Serial Bonds:						
	02/01/2021	1,775,000	5.000%	0.971%	103.024	53,676.00
	02/01/2022	1,380,000	5.000%	1.010%	106.924	95,551.20
	02/01/2023	1,450,000	5.000%	1.040%	110.728	155,556.00
	02/01/2024	1,525,000	5.000%	1.060%	114.467	220,621.75
	02/01/2025	1,600,000	5.000%	1.090%	118.070	289,120.00
	02/01/2026	1,680,000	5.000%	1.120%	121.566	362,308.80
	02/01/2027	1,760,000	5.000%	1.160%	124.879	437,870.40
	02/01/2028	1,850,000	5.000%	1.190%	128.144	520,664.00
	02/01/2029	1,940,000	5.000%	1.270%	130.813	597,772.20
	02/01/2030	2,040,000	5.000%	1.350%	133.255	678,402.00
	02/01/2031	2,145,000	5.000%	1.470%	131.970 C	685,756.50
	02/01/2032	2,250,000	5.000%	1.580%	130.804 C	693,090.00
	02/01/2033	2,365,000	5.000%	1.690%	129.651 C	701,246.15
	02/01/2034	2,480,000	4.000%	1.970%	117.934 C	444,763.20
	02/01/2035	2,580,000	4.000%	2.030%	117.353 C	447,707.40
	02/01/2036	2,685,000	4.000%	2.090%	116.774 C	450,381.90
	02/01/2037	2,790,000	4.000%	2.150%	116.199 C	451,952.10
	02/01/2038	2,905,000	4.000%	2.190%	115.818 C	459,512.90
	02/01/2039	3,020,000	4.000%	2.230%	115.438 C	466,227.60
	02/01/2040	3,140,000	4.000%	2.270%	115.059 C	472,852.60
		43,360,000				8,685,032.70

Dated Date	04/29/2020	
Delivery Date	04/29/2020	
First Coupon	08/01/2020	
Par Amount	43,360,000.00	
Premium	8,685,032.70	
Production	52,045,032.70	120.030057%
Underwriter's Discount	-197,394.85	-0.455246%
Purchase Price	51,847,637.85	119.574811%
Accrued Interest		
Net Proceeds	51,847,637.85	

FORM 8038 STATISTICS

City of Kansas City, Missouri
General Obligation Bonds, Series 2020ADated Date 04/29/2020
Delivery Date 04/29/2020

Bond Component	Date	Principal	Coupon	Price	Issue Price	Redemption at Maturity
Serial Bonds:						
	02/01/2021	1,775,000.00	5.000%	103.024	1,828,676.00	1,775,000.00
	02/01/2022	1,380,000.00	5.000%	106.924	1,475,551.20	1,380,000.00
	02/01/2023	1,450,000.00	5.000%	110.728	1,605,556.00	1,450,000.00
	02/01/2024	1,525,000.00	5.000%	114.467	1,745,621.75	1,525,000.00
	02/01/2025	1,600,000.00	5.000%	118.070	1,889,120.00	1,600,000.00
	02/01/2026	1,680,000.00	5.000%	121.566	2,042,308.80	1,680,000.00
	02/01/2027	1,760,000.00	5.000%	124.879	2,197,870.40	1,760,000.00
	02/01/2028	1,850,000.00	5.000%	128.144	2,370,664.00	1,850,000.00
	02/01/2029	1,940,000.00	5.000%	130.813	2,537,772.20	1,940,000.00
	02/01/2030	2,040,000.00	5.000%	133.255	2,718,402.00	2,040,000.00
	02/01/2031	2,145,000.00	5.000%	131.970	2,830,756.50	2,145,000.00
	02/01/2032	2,250,000.00	5.000%	130.804	2,943,090.00	2,250,000.00
	02/01/2033	2,365,000.00	5.000%	129.651	3,066,246.15	2,365,000.00
	02/01/2034	2,480,000.00	4.000%	117.934	2,924,763.20	2,480,000.00
	02/01/2035	2,580,000.00	4.000%	117.353	3,027,707.40	2,580,000.00
	02/01/2036	2,685,000.00	4.000%	116.774	3,135,381.90	2,685,000.00
	02/01/2037	2,790,000.00	4.000%	116.199	3,241,952.10	2,790,000.00
	02/01/2038	2,905,000.00	4.000%	115.818	3,364,512.90	2,905,000.00
	02/01/2039	3,020,000.00	4.000%	115.438	3,486,227.60	3,020,000.00
	02/01/2040	3,140,000.00	4.000%	115.059	3,612,852.60	3,140,000.00
		43,360,000.00			52,045,032.70	43,360,000.00

	Maturity Date	Interest Rate	Issue Price	Stated Redemption at Maturity	Weighted Average Maturity	Yield
Final Maturity	02/01/2040	4.000%	3,612,852.60	3,140,000.00		
Entire Issue			52,045,032.70	43,360,000.00	11.6619	1.7712%

Proceeds used for accrued interest	0.00
Proceeds used for bond issuance costs (including underwriters' discount)	410,394.85
Proceeds used for credit enhancement	0.00
Proceeds allocated to reasonably required reserve or replacement fund	0.00

PROOF OF ARBITRAGE YIELD

City of Kansas City, Missouri
General Obligation Bonds, Series 2020A

Date	Debt Service	Total	Present Value to 04/29/2020 @ 1.7711960327%
08/01/2020	503,955.55	503,955.55	501,689.60
02/01/2021	2,761,000.00	2,761,000.00	2,724,457.90
08/01/2021	941,625.00	941,625.00	921,006.09
02/01/2022	2,321,625.00	2,321,625.00	2,250,854.49
08/01/2022	907,125.00	907,125.00	871,752.72
02/01/2023	2,357,125.00	2,357,125.00	2,245,327.10
08/01/2023	870,875.00	870,875.00	822,287.44
02/01/2024	2,395,875.00	2,395,875.00	2,242,346.97
08/01/2024	832,750.00	832,750.00	772,545.61
02/01/2025	2,432,750.00	2,432,750.00	2,237,060.83
08/01/2025	792,750.00	792,750.00	722,582.42
02/01/2026	2,472,750.00	2,472,750.00	2,234,097.79
08/01/2026	750,750.00	750,750.00	672,338.74
02/01/2027	2,510,750.00	2,510,750.00	2,228,779.44
08/01/2027	706,750.00	706,750.00	621,870.95
02/01/2028	2,556,750.00	2,556,750.00	2,229,941.87
08/01/2028	660,500.00	660,500.00	571,016.85
02/01/2029	2,600,500.00	2,600,500.00	2,228,454.59
08/01/2029	612,000.00	612,000.00	519,839.39
02/01/2030	29,012,000.00	29,012,000.00	24,426,781.91
	59,000,205.55	59,000,205.55	52,045,032.70

Proceeds Summary

Delivery date	04/29/2020
Par Value	43,360,000.00
Premium (Discount)	8,685,032.70
Target for yield calculation	52,045,032.70

PROOF OF ARBITRAGE YIELD

City of Kansas City, Missouri
General Obligation Bonds, Series 2020AAssumed Call/Computation Dates for Premium Bonds

Bond Component	Maturity Date	Rate	Yield	Call Date	Call Price	Yield To Call/Maturity
SERIAL	02/01/2031	5.000%	1.470%	02/01/2030	100.000	1.4704616%
SERIAL	02/01/2032	5.000%	1.580%	02/01/2030	100.000	1.5805592%
SERIAL	02/01/2033	5.000%	1.690%	02/01/2030	100.000	1.6905746%
SERIAL	02/01/2034	4.000%	1.970%	02/01/2030	100.000	1.9705662%
SERIAL	02/01/2035	4.000%	2.030%	02/01/2030	100.000	2.0305271%
SERIAL	02/01/2036	4.000%	2.090%	02/01/2030	100.000	2.0906266%
SERIAL	02/01/2037	4.000%	2.150%	02/01/2030	100.000	2.1506553%
SERIAL	02/01/2038	4.000%	2.190%	02/01/2030	100.000	2.1906217%
SERIAL	02/01/2039	4.000%	2.230%	02/01/2030	100.000	2.2306362%
SERIAL	02/01/2040	4.000%	2.270%	02/01/2030	100.000	2.2706987%

Rejected Call/Computation Dates for Premium Bonds

Bond Component	Maturity Date	Rate	Yield	Call Date	Call Price	Yield To Call/Maturity	Increase to Yield
SERIAL	02/01/2031	5.000%	1.470%			1.7299529%	0.2594914%
SERIAL	02/01/2032	5.000%	1.580%			2.0399148%	0.4593556%
SERIAL	02/01/2033	5.000%	1.690%			2.3041819%	0.6136073%
SERIAL	02/01/2034	4.000%	1.970%			2.4559790%	0.4854129%
SERIAL	02/01/2035	4.000%	2.030%			2.5788434%	0.5483163%
SERIAL	02/01/2036	4.000%	2.090%			2.6873421%	0.5967155%
SERIAL	02/01/2037	4.000%	2.150%			2.7839291%	0.6332738%
SERIAL	02/01/2038	4.000%	2.190%			2.8580789%	0.6674571%
SERIAL	02/01/2039	4.000%	2.230%			2.9249595%	0.6943233%
SERIAL	02/01/2040	4.000%	2.270%			2.9856858%	0.7149871%

EXHIBIT B

IRS FORM 8038-G

► Under Internal Revenue Code section 149(e)

► See separate instructions.

Department of the Treasury
Internal Revenue Service

Caution: If the issue price is under \$100,000, use Form 8038-GC.

► Go to www.irs.gov/F8038G for instructions and the latest information.

Part I Reporting Authority		If Amended Return, check here <input type="checkbox"/>	
1 Issuer's name City of Kansas City, Missouri		2 Issuer's employer identification number (EIN) 44-6000201	
3a Name of person (other than issuer) with whom the IRS may communicate about this return (see instructions) Tracy E. Shafton, Gilmore & Bell, P.C., Bond Counsel		3b Telephone number of other person shown on 3a 816-221-1000	
4 Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	5 Report number (For IRS Use Only)	
2405 Grand Boulevard	1100	3	
6 City, town, or post office, state, and ZIP code Kansas City, Missouri 64108		7 Date of issue 04/29/2020	
8 Name of issue General Obligation Bonds, Series 2020A		9 CUSIP number 484873 QC1	
10a Name and title of officer or other employee of the issuer whom the IRS may call for more information (see instructions) Tammy Queen, Director of Finance		10b Telephone number of officer or other employee shown on 10a 816-513-1173	

Part II Type of Issue (enter the issue price). See the instructions and attach schedule.			
11 Education	11		
12 Health and hospital	12		
13 Transportation	13	25,729,014	47
14 Public safety	14		
15 Environment (including sewage bonds)	15	13,077,265	93
16 Housing	16		
17 Utilities	17		
18 Other. Describe ► Public Building Improvements and Municipal Art	18	13,238,752	30
19a If bonds are TANs or RANs, check only box 19a			<input type="checkbox"/>
b If bonds are BANs, check only box 19b			<input type="checkbox"/>
20 If bonds are in the form of a lease or installment sale, check box			<input type="checkbox"/>

Part III Description of Bonds. Complete for the entire issue for which this form is being filed.					
	(a) Final maturity date	(b) Issue price	(c) Stated redemption price at maturity	(d) Weighted average maturity	(e) Yield
21	02/01/2040	\$ 52,045,032.70	\$ 43,360,000.00	11.6619 years	1.7711 %

Part IV Uses of Proceeds of Bond Issue (including underwriters' discount)				
22	Proceeds used for accrued interest	22	0	00
23	Issue price of entire issue (enter amount from line 21, column (b))	23	52,045,032	70
24	Proceeds used for bond issuance costs (including underwriters' discount)	24	410,394	85
25	Proceeds used for credit enhancement	25		
26	Proceeds allocated to reasonably required reserve or replacement fund	26		
27	Proceeds used to refund prior tax-exempt bonds. Complete Part V	27		
28	Proceeds used to refund prior taxable bonds. Complete Part V	28		
29	Total (add lines 24 through 28)	29	410,394	85
30	Nonrefunding proceeds of the issue (subtract line 29 from line 23 and enter amount here)	30	51,634,637	85

Part V Description of Refunded Bonds. Complete this part only for refunding bonds.		
31	Enter the remaining weighted average maturity of the tax-exempt bonds to be refunded	_____ years
32	Enter the remaining weighted average maturity of the taxable bonds to be refunded	_____ years
33	Enter the last date on which the refunded tax-exempt bonds will be called (MM/DD/YYYY)	_____
34	Enter the date(s) the refunded bonds were issued (MM/DD/YYYY)	_____

Part VI Miscellaneous

35	Enter the amount of the state volume cap allocated to the issue under section 141(b)(5)	35	
36a	Enter the amount of gross proceeds invested or to be invested in a guaranteed investment contract (GIC). See instructions	36a	
b	Enter the final maturity date of the GIC ▶ (MM/DD/YYYY) _____		
c	Enter the name of the GIC provider ▶ _____		
37	Pooled financings: Enter the amount of the proceeds of this issue that are to be used to make loans to other governmental units	37	
38a	If this issue is a loan made from the proceeds of another tax-exempt issue, check box <input type="checkbox"/> and enter the following information:		
b	Enter the date of the master pool bond ▶ (MM/DD/YYYY) _____		
c	Enter the EIN of the issuer of the master pool bond ▶ _____		
d	Enter the name of the issuer of the master pool bond ▶ _____		
39	If the issuer has designated the issue under section 265(b)(3)(B)(i)(III) (small issuer exception), check box <input type="checkbox"/>		
40	If the issuer has elected to pay a penalty in lieu of arbitrage rebate, check box <input type="checkbox"/>		
41a	If the issuer has identified a hedge, check here <input type="checkbox"/> and enter the following information:		
b	Name of hedge provider ▶ _____		
c	Type of hedge ▶ _____		
d	Term of hedge ▶ _____		
42	If the issuer has superintegrated the hedge, check box <input type="checkbox"/>		
43	If the issuer has established written procedures to ensure that all nonqualified bonds of this issue are remediated according to the requirements under the Code and Regulations (see instructions), check box <input checked="" type="checkbox"/>		
44	If the issuer has established written procedures to monitor the requirements of section 148, check box <input checked="" type="checkbox"/>		
45a	If some portion of the proceeds was used to reimburse expenditures, check here <input checked="" type="checkbox"/> and enter the amount of reimbursement ▶ \$24,942,642.30		
b	Enter the date the official intent was adopted ▶ (MM/DD/YYYY) 01/19/2017		

Signature and Consent

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I consent to the IRS's disclosure of the issuer's return information, as necessary to process this return, to the person that I have authorized above.

Signature of issuer's authorized representative: _____ Date: _____
 Type or print name and title: **Tammy Queen, Director of Finance**

Paid Preparer Use Only	Print/Type preparer's name Alan Woolever	Preparer's signature <i>Alan Woolever</i>	Date	Check <input type="checkbox"/> if self-employed	PTIN P01062536
	Firm's name ▶ Gilmore & Bell, P.C.			Firm's EIN ▶ 43-1611738	
	Firm's address ▶ 2405 Grand Boulevard, Suite 1100, Kansas City, MO 64108			Phone no. 816-221-1000	

▶ Under Internal Revenue Code section 149(e)

▶ See separate instructions.

Department of the Treasury
Internal Revenue Service

Caution: If the issue price is under \$100,000, use Form 8038-GC.

▶ Go to www.irs.gov/F8038G for instructions and the latest information.

Part I Reporting Authority		If Amended Return, check here <input type="checkbox"/>	
1 Issuer's name City of Kansas City, Missouri		2 Issuer's employer identification number (EIN) 44-6000201	
3a Name of person (other than issuer) with whom the IRS may communicate about this return (see instructions) Tracy E. Shafton, Gilmore & Bell, P.C., Bond Counsel		3b Telephone number of other person shown on 3a 816-221-1000	
4 Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	5 Report number (For IRS Use Only)	
2405 Grand Boulevard	1100	3	
6 City, town, or post office, state, and ZIP code Kansas City, Missouri 64108		7 Date of issue 04/29/2020	
8 Name of issue General Obligation Bonds, Series 2020A		9 CUSIP number 484873 QC1	
10a Name and title of officer or other employee of the issuer whom the IRS may call for more information (see instructions) Tammy Queen, Director of Finance		10b Telephone number of officer or other employee shown on 10a 816-513-1173	

Part II Type of Issue (enter the issue price). See the instructions and attach schedule.

11	Education	11		
12	Health and hospital	12		
13	Transportation	13	25,729,014	47
14	Public safety	14		
15	Environment (including sewage bonds)	15	13,077,265	93
16	Housing	16		
17	Utilities	17		
18	Other. Describe ▶ Public Building Improvements and Municipal Art	18	13,238,752	30
19a	If bonds are TANs or RANs, check only box 19a			
19b	If bonds are BANs, check only box 19b			
20	If bonds are in the form of a lease or installment sale, check box			

Part III Description of Bonds. Complete for the entire issue for which this form is being filed.

	(a) Final maturity date	(b) Issue price	(c) Stated redemption price at maturity	(d) Weighted average maturity	(e) Yield
21	02/01/2040	\$ 52,045,032.70	\$ 43,360,000.00	11.6619 years	1.7711 %

Part IV Uses of Proceeds of Bond Issue (including underwriters' discount)

22	Proceeds used for accrued interest	22	0	00
23	Issue price of entire issue (enter amount from line 21, column (b))	23	52,045,032	70
24	Proceeds used for bond issuance costs (including underwriters' discount)	24	410,394	85
25	Proceeds used for credit enhancement	25		
26	Proceeds allocated to reasonably required reserve or replacement fund	26		
27	Proceeds used to refund prior tax-exempt bonds. Complete Part V	27		
28	Proceeds used to refund prior taxable bonds. Complete Part V	28		
29	Total (add lines 24 through 28)	29	410,394	85
30	Nonrefunding proceeds of the issue (subtract line 29 from line 23 and enter amount here)	30	51,634,637	85

Part V Description of Refunded Bonds. Complete this part only for refunding bonds.

31 Enter the remaining weighted average maturity of the tax-exempt bonds to be refunded ▶ _____ years

32 Enter the remaining weighted average maturity of the taxable bonds to be refunded ▶ _____ years

33 Enter the last date on which the refunded tax-exempt bonds will be called (MM/DD/YYYY) ▶ _____

34 Enter the date(s) the refunded bonds were issued ▶ (MM/DD/YYYY)

Part VI Miscellaneous

35	Enter the amount of the state volume cap allocated to the issue under section 141(b)(5)	35	
36a	Enter the amount of gross proceeds invested or to be invested in a guaranteed investment contract (GIC). See instructions	36a	
b	Enter the final maturity date of the GIC ▶ (MM/DD/YYYY) _____		
c	Enter the name of the GIC provider ▶ _____		
37	Pooled financings: Enter the amount of the proceeds of this issue that are to be used to make loans to other governmental units	37	
38a	If this issue is a loan made from the proceeds of another tax-exempt issue, check box <input type="checkbox"/> and enter the following information:		
b	Enter the date of the master pool bond ▶ (MM/DD/YYYY) _____		
c	Enter the EIN of the issuer of the master pool bond ▶ _____		
d	Enter the name of the issuer of the master pool bond ▶ _____		
39	If the issuer has designated the issue under section 265(b)(3)(B)(i)(III) (small issuer exception), check box <input type="checkbox"/>		
40	If the issuer has elected to pay a penalty in lieu of arbitrage rebate, check box <input type="checkbox"/>		
41a	If the issuer has identified a hedge, check here <input type="checkbox"/> and enter the following information:		
b	Name of hedge provider ▶ _____		
c	Type of hedge ▶ _____		
d	Term of hedge ▶ _____		
42	If the issuer has superintegrated the hedge, check box <input type="checkbox"/>		
43	If the issuer has established written procedures to ensure that all nonqualified bonds of this issue are remediated according to the requirements under the Code and Regulations (see instructions), check box <input checked="" type="checkbox"/>		
44	If the issuer has established written procedures to monitor the requirements of section 148, check box <input checked="" type="checkbox"/>		
45a	If some portion of the proceeds was used to reimburse expenditures, check here <input checked="" type="checkbox"/> and enter the amount of reimbursement ▶ \$24,942,642.30		
b	Enter the date the official intent was adopted ▶ (MM/DD/YYYY) 01/19/2017		

Signature and Consent

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I consent to the IRS's disclosure of the issuer's return information, as necessary to process this return, to the person that I have authorized above.

Signature of issuer's authorized representative: _____ Date: _____

Tammy Queen, Director of Finance
Type or print name and title

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Alan Woolever	<i>Alan Woolever</i>			P01062536
	Firm's name ▶ Gilmore & Bell, P.C.	Firm's EIN ▶ 43-1611738		Firm's address ▶ 2405 Grand Boulevard, Suite 1100, Kansas City, MO 64108	
				Phone no. 816-221-1000	

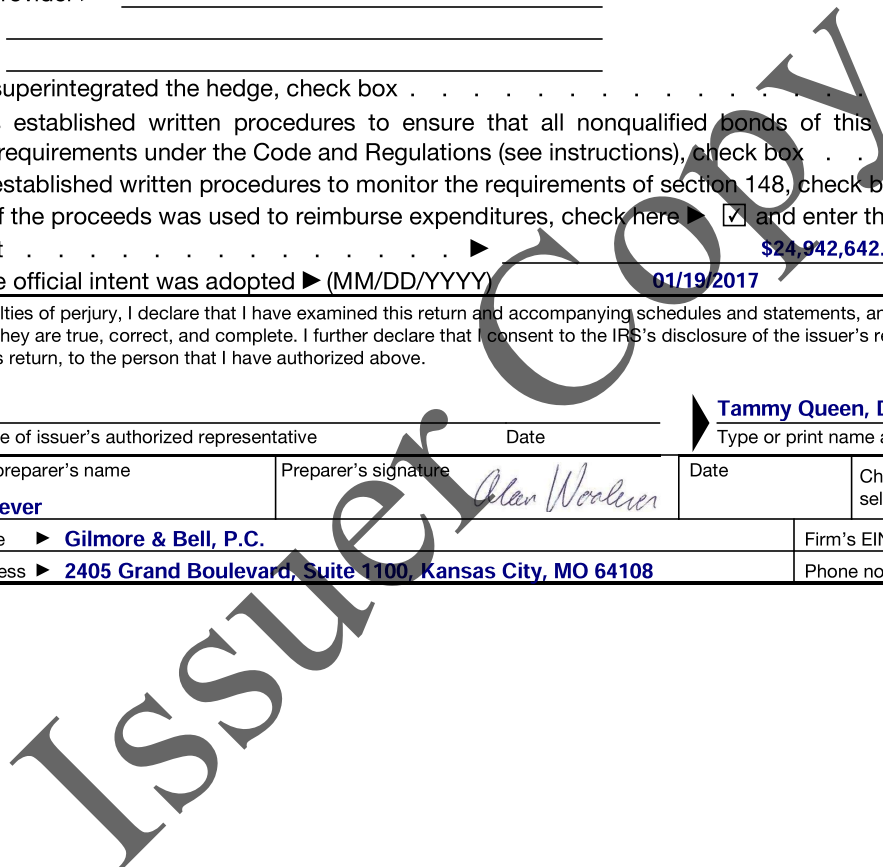


EXHIBIT C

ORDINANCES EVIDENCING INTENT TO FINANCE

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 160877, AS AMENDED

Calling an election on April 4, 2017, for the purpose of authorizing the issuance of an amount not to exceed \$800,000,000.00 in General Obligation Bonds; directing the City Clerk to provide notice of the election; declaring the City's intention to reimburse itself from bond proceeds for bond related expenditures; and recognizing this ordinance as having an accelerated effective date.

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section 1. The City Council finds it necessary and hereby declares its intent to borrow an amount not to exceed \$800,000,000.00 for the purpose of paying for basic capital infrastructure and to evidence such borrowing by the issuance of general obligation bonds of the City of Kansas City, Missouri (the "City"), in a maximum principal amount of \$800,000,000.00.

Section 2. A special election is ordered to be held in the City on Tuesday, April 4, 2017, on the following questions:

QUESTION NO. 1

(Basic capital infrastructure Streets, Bridges, and Sidewalks)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$600,000,000.00 for the purpose of paying for the construction and reconstruction of streets, bridges, and sidewalks?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

QUESTION NO. 2

(Basic capital infrastructure Flood Control)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$150,000,000.00 for the purpose of paying for the acquisition, construction, equipping and reconstruction of flood control projects including, but not limited to, projects partially funded with Federal grants?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

QUESTION NO. 3

(Basic capital infrastructure Public Buildings and Structures)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$50,000,000.00 for the purpose of paying for the acquisition, construction, equipping and improving of public buildings, facilities, and structures including, but not limited to, the Animal Shelter and for Americans with Disabilities Act improvements to public buildings and structures?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

Section 3. The form of the Notice of Bond Election for said election will read as follows:

NOTICE OF BOND ELECTION
CITY OF KANSAS CITY, MISSOURI

Notice is given to the qualified voters of the City of Kansas City, Missouri, that the City Council of the City has called a special election to be held in the City on April 4, 2017, commencing at 6:00 A.M. and closing at 7:00 P.M., on the questions contained in the following sample ballot:

OFFICIAL BALLOT
SPECIAL BOND ELECTION
CITY OF KANSAS CITY, MISSOURI

APRIL 4, 2017
QUESTION NO. 1

(Basic capital infrastructure Streets, Bridges, and Sidewalks)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$600,000,000.00 for the purpose of paying for the construction and reconstruction of streets, bridges, and sidewalks?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

YES [] NO []

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 160877, AS AMENDED

QUESTION NO. 2
(Basic capital infrastructure Flood Control)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$150,000,000.00 for the purpose of paying for the acquisition, construction, equipping and reconstruction of flood control projects including, but not limited to, projects partially funded with Federal grants?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

YES NO

QUESTION NO. 3
(Basic capital infrastructure Public Buildings and Structures)

Shall the City of Kansas City, Missouri issue its general obligation bonds in an amount not to exceed \$50,000,000.00 for the purpose of paying for the acquisition, construction, equipping and improving of public buildings, facilities, and structures including, but not limited to, the Animal Shelter and for Americans with Disabilities Act improvements to public buildings and structures?

The authorization of the bonds will authorize the City to maintain tangible property tax rates sufficient to pay the interest and principal on the bonds until fully paid.

YES NO

Instructions to voters will be supplied by the election authorities.

A complete copy of Committee Substitute for Ordinance No. 160877, submitting this question to the electorate, is on file in the Office of the City Clerk of Kansas City, Missouri, and is open for inspection and copying.


The election will be held at the following polling places in the City of Kansas City, Missouri: [insert list in last publication only]

I certify that the foregoing is the legal notice to be published pursuant to Section 115.127, R.S.Mo., as amended.

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 160877

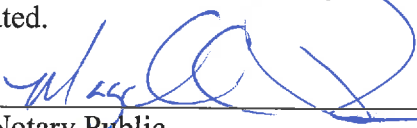
Given under my hand and the official seal of the City of Kansas City, Missouri, 1/20, 2017.

(SEAL)


Marilyn Sanders
City Clerk of Kansas City, Missouri

Before me a notary public personally appeared Marilyn Sanders, to me known to be the City Clerk of Kansas City, Missouri, and the person who acknowledged to me that she executed the same for the purposes therein stated.

MAGDALENA REA
Notary Public - Notary Seal
State of Missouri, Clay County
Commission # 14629938
My Commission Expires Sep 7, 2018


Notary Public

My Commission Expires: Sep 7 2018

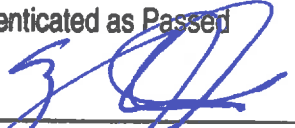
Section 4. Upon passage of this ordinance and not later than January 24, 2017, the Clerk shall deliver certified copies of this ordinance and notice of election to the Board of Election Commissioners of Kansas City, Missouri, the Board of Election Commissioners of Platte and Clay Counties, Missouri, and to the Clerk of the County Commission of Cass County, Missouri.

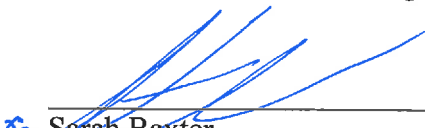
Section 5. That the City expects to make capital expenditures in connection with the projects to be financed and hereby declares its official intent to reimburse itself for certain expenditures made within 60 days prior to or on and after the date of this ordinance with the proceeds of the bonds. The maximum principal amount of obligations expected to be financed for the projects is \$800,000,000.00. This constitutes a declaration of official intent under Treasury Regulation 1.150-2.

Section 6. This ordinance providing for the submission of a question to the people of Kansas City, Missouri is recognized as having an accelerated effective date within the meaning of Section 503(a)(3)(A), Charter of Kansas City, and as such shall become effective in accordance with that section.

Approved as to form and legality:



Authenticated as Passed

Sly James, Mayor


Sarah Baxter
Assistant City Attorney


Marilyn Sanders, City Clerk

JAN 19 2017

Date Passed

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 170361, AS AMENDED

Establishing Fund No. 3518, the General Obligation Series 2018A Bond Fund, in the records of the City of Kansas City, Missouri; estimating revenues and appropriations of \$44,677,000.00 in Fund No. 3518, the General Obligation Series 2018A Bond Fund; designating requisitioning authority; declaring the City's intent to reimburse itself for certain expenditures; declaring that one percent of all GO Bond net proceeds shall be dedicated for the creation and construction and installation of works of art; and recognizing this ordinance as having an accelerated effective date.

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section 1. That Fund No. 3518, the General Obligation Series 2018A Bond Fund, is hereby established in the records of the City of Kansas City, Missouri.

Section 2. That the revenue in the following account of the General Obligation Series 2018A Bond Fund, is hereby estimated in the following amount:

AL-3518-120000-590000	Bond Proceeds	\$44,677,000.00
-----------------------	---------------	-----------------

Section 3. That the sum of \$44,677,000.00 is hereby appropriated from the Unappropriated Fund Balance of the General Obligation Series 2018A Bond Fund to the following account:

AL-3518-898012-B-89008573	North Oak Trafficway	\$1,180,000.00
AL-3518-708012-E-70182903	Maple Woods Parkway	1,700,000.00
AL-3518-707709-B-70168803	Spirit of Freedom Fountain	750,000.00
AL-3518-707709-B-70168805	Delbert Haff Fountain	750,000.00
AL-3518-707773-B-70155505	KC Museum	4,000,000.00
AL-3518-707706-B-70175933	Starlight ADA	1,100,000.00
AL-3518-078027-B-07001111	City Hall - Elevator ADA	750,000.00
AL-3518-708025-B-70185200	Animal Shelter	7,000,000.00
AL-3518-808055-B-89002672	Swope Park Industrial ROW	1,100,000.00
AL-3518-898043-B-89008263	Southwest Quadrant Beacon Hill	3,700,000.00
AL-3518-898404-B-89020329	Marlborough Community Infrastructure	2,250,000.00
AL-3518-708014-B-70172207	Paseo Gateway	3,500,000.00
AL-3518-898077-B-89060522	Sidewalk Repair-Citywide IDIQ	500,000.00
AL-3518-898077-B-89060524	Sidewalk Repair-Spot Repair Project A	2,750,000.00
AL-3518-898077-B-89060525	Sidewalk Repair-Spot Repair Project B	2,750,000.00
AL-3518-898077-B-89060487	Curb Ramps-ADA Corners Citywide	650,000.00
AL-3518-898077-B-89060526	Curb Ramps-ADA Corners 2 Citywide	850,000.00

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 170361, AS AMENDED

AL-3518-897001-B-89008240	Wornall Road, 85th-89th	680,000.00
AL-3518-897702-B-89008538	Beardsley Road Landslide	75,000.00
AL-3518-898013-B-89008009	22nd/23rd Street	1,200,000.00
AL-3518-898037-B-89005559	Paseo Bridge Repairs (Brush Creek)	600,000.00
AL-3518-898013-B-89008518	135th St from Wornall Rd to M-150	3,000,000.00
AL-3518-898037-B-89020330	Prospect MAX	2,500,000.00
AL-3518-898044-B-89004764	Broadway Traffic Synchronization	900,000.00
AL-3518-071254-B	Municipal Art Commission	442,000.00
	TOTAL	<u>\$44,677,000.00</u>

Section 4. That the Parks and Recreation Director is hereby designated as requisitioning authority for Account Nos. AL-3518-708012, AL-3518-707709, AL-3518-707773, AL-3518-707706, AL-3518-708025, and AL-3518-708014. That the Director of General Services is hereby designated as requisitioning authority for Account No. AL-3518-078027. That the Director of Water Services is hereby designated as requisitioning authority for Account No. AL-3518-808055. That the Director of Public Works is hereby designated as requisitioning authority for Account Nos. AL-3518-898012, AL-3518-898043, AL-3518-898404, AL-3518-898077, AL-3518-897701, AL-3518-897702, AL-3518-898013, AL-3518-898037 and AL-3518-898044.

Section 5. That the City hereby declares its official intent to reimburse itself for certain expenditures made within sixty (60) days prior to or on and after the date of this ordinance with respect to the appropriations listed in Section 3 (collectively the "Projects") with the proceeds of bonds expected to be issued by the City. The maximum principal amount of bonds expected to be issued for the Projects is not to exceed \$44,677,000.00. This constitutes a declaration of official intent under Treasury Regulation Section 1.150-2.

Section 6. Authorizing the Director of Finance to receive and deposit into the Public Art Fund contributions, allocations and appropriations for works of art; declaring that one percent of the estimated costs of construction, reconstruction, or remodeling of any municipal building shall be appropriated to the Public Art Fund; and declaring that one percent of all GO Bond net proceeds shall be dedicated for the creation and construction and installation of works of art, to be allocated as follows: one percent of GO bond proceeds issued under each of the three questions voters approved at an election held on April 4, 2017, will be allocated to fund works of art that qualify as projects under each of the three ballot questions, respectively, such that bond proceeds authorized to fund streets, sidewalks and bridges will only be used to fund street, sidewalk and bridge art projects; bond proceeds authorized to fund flood control projects will only be used to fund flood control art projects; and bond proceeds authorized to fund public buildings and structures will only be used to fund art projects at public buildings and structures.

Section 7. That the Director of Finance is hereby authorized to close project accounts, open encumbrances and retainage and return the unspent portion of the Fund

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 170361, AS AMENDED

Balance from which it came upon the earliest of: (i) Project's completion; (ii) final maturity of financing or (iii) five years after issuance.

Section 8. That this Ordinance is recognized as an ordinance with an accelerated effective date as provided by Section 503(a)(3)(C) of the City Charter in that it appropriates money, and shall take effect in accordance with that section.

I hereby certify that there is a balance, otherwise unencumbered, to the credit of the appropriation to which the foregoing expenditure is to be charged, and a cash balance, otherwise unencumbered, in the treasury, to the credit of the fund from which payment is to be made, each sufficient to meet the obligation hereby incurred.

for *James Queen*
Randall J. Landes
Director of Finance

Approved as to form and legality:

for *Cecelia Abbott*
Sarah Baxter
Assistant City Attorney



Authenticated as Passed

[Signature]
Sly James, Mayor

[Signature]
Marilyn Sanders, City Clerk

JUN 29 2017

Date Passed

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 180139

Establishing Fund No. 3519, the General Obligation Series 2019A Bond Fund in the records of the City of Kansas City, Missouri; estimating revenues and appropriating \$60,659,128.00 from the Unappropriated Fund Balance of the General Obligation Series 2019A Bond Fund; designating requisitioning authorities; declaring the intent of the City to reimburse itself from the bond proceeds for certain expenditures; authorizing the Director of Finance to close project accounts; and establishing the effective date of this ordinance.

WHEREAS, in a Special Election called on April 4, 2017, the voters of the City of Kansas City, Missouri approved Question 1 to be used for funding roads, bridges and sidewalks, Question 2 to be used for flood control and Question 3 to be used for public buildings; NOW, THEREFORE,

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section 1. That Fund No. 3519, the General Obligation Series 2019A Bond Fund, is hereby established in the records of the City of Kansas City, Missouri.

Section 2. That the revenue in the following account of the General Obligation Series 2019A Bond Fund, is hereby estimated in the following amount:

AL-3519-120000-590000	Bond Proceeds	\$60,659,128.00
-----------------------	---------------	-----------------

Section 3. Question 1 – Roads, Bridges, Sidewalks for the sum of \$36,009,500.00 is hereby appropriated from the Unappropriated Fund Balance of the General Obligation Series 2019A Bond Fund to the following accounts:

AL-3519-708012-E-70182903	Maple Woods Parkway	\$ 6,800,000.00
AL-3519-708014-B-70172207	Paseo Gateway	5,500,000.00
AL-3519-898077-B-89060525	Sidewalk Repair-Spot Repair Project B	5,000,000.00
AL-3519-898077-B-89060487	Curb Ramps-ADA Corners Citywide	2,500,000.00
AL-3519-897001-B-89008583	155th Street – Kensington to Scott Ave	1,478,100.00
AL-3519-897001-B-89008585	Kenneth Road Bridge	450,000.00
AL-3519-897001-B-89008586	Green Hills Road (Platte Brooke to 78th)	515,000.00
AL-3519-897001-B-89009996	Englewood Road	700,000.00
AL-3519-897001-B-89008587	Gregory Blvd over Big Blue River	650,000.00
AL-3519-898037-B-89020330	Prospect MAX	9,266,400.00
AL-3519-897001-B-89008588	Red Bridge (Holmes to Wornall)	2,250,000.00
AL-3519-897001-B-89008545	Candlelight Ridge Infrastructure	<u>900,000.00</u>
	ROADWAY TOTAL	\$36,009,500.00

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 180139

Section 4. Question 2 – Flood Control for the sum of \$9,120,826.00 is hereby appropriated from the Unappropriated Fund Balance of the General Obligation Series 2019A Bond Fund to the following accounts:

AL-3519-808055-B-89002672	Swope Park Industrial ROW	\$ 1,000,000.00
AL-3519-129600-B	Dodson/Turkey Creek Debt Service	7,620,826.00
AL-3519-808035-B-89009996	Brush Creek – Lake of Enshriners	<u>500,000.00</u>
	FLOOD TOTAL	\$ 9,120,826.00

Section 5. Question 3 – Public Buildings for the sum of \$15,528,802.00 is hereby appropriated from the Unappropriated Fund Balance of the General Obligation Series 2019A Bond Fund to the following accounts:

AL-3519-707773-B-70155505	KC Museum	\$ 4,000,000.00
AL-3519-078027-B-89009996	City Hall -Core ADA	2,128,802.00
AL-3519-708025-B-70185200	Animal Shelter	7,000,000.00
AL-3519-078102-B-7001309	North Fire Station	2,000,000.00
AL-3519-071254-B	Public Art	<u>400,000.00</u>
	BUILDINGS TOTAL	\$15,528,802.00

Section 6. That the Director of Public Works is hereby designated as the requisitioning authority for Account Nos. AL-3519-898077, AL-3519-897001 and AL-3519-898037, that the Director of the Parks and Recreation Department is hereby designated as the requisitioning authority for Account Nos. AL-3519-708012, AL-3519-708014, AL-3519-707773 and AL-3519-708025, that the Director of Water Services is hereby designated as the requisitioning authority for Account Nos. AL-3519-808055 and AL-3519-808035, that the Director of the General Services Department is hereby designated as the requisitioning authority for Account Nos. AL-3519-078027, AL-3519-078102 and AL-3519-071254, and that the Director of Finance is designated as the requisitioning authority for Account No. AL-3519-129600.

Section 7. That the City Council hereby declares its official intent to reimburse itself for certain expenditures made within sixty (60) days prior to or on and after the date of this ordinance with respect to appropriations in Section 3, Section 4 and Section 5 (collectively the “Appropriations”) from the General Obligation Series 2019A Bond Fund with the proceeds of bonds expected to be issued by the City. The maximum principal amount of bonds expected to be issued for the Appropriations is not to exceed \$59,159,128.00. This constitutes a declaration of official intent under Treasury Regulation 1.150-2.

Section 8. That the Director of Finance is hereby authorized to close project accounts, open encumbrances and retainage related to the accounts in Section 3, Section 4 and Section 5, and return the unspent portion to the Fund balance from which it came upon the earliest of: (i) Project’s completion; (ii) final maturity of financing or (iii) five years after issuance.

COMMITTEE SUBSTITUTE FOR ORDINANCE NO. 180139

Section 9. That this ordinance shall become effective on May 1, 2018.

I hereby certify that there is a balance, otherwise unencumbered, to the credit of the appropriation to which the foregoing expenditure is to be charged, and a cash balance, otherwise unencumbered, in the treasury, to the credit of the fund from which payment is to be made, each sufficient to meet the obligation hereby incurred.

Randall J. Landes
Director of Finance

Approved as to form and legality:



Katherine Chandler
Assistant City Attorney



Authenticated as Passed



Sly James, Mayor



Mariyn Sanders, City Clerk

MAR 22 2018

Date Passed

EXHIBIT D

**DESCRIPTION OF PROPERTY COMPRISING THE FINANCED FACILITY
AND
LIST OF REIMBURSEMENT EXPENDITURES**

EXHIBIT D TO FEDERAL TAX CERTIFICATE

Description of Property Comprising the Project and Financed Property



Series 2020A Project

Asset Description	Original Economic Life	Cost	Economic Life x Financed Cost
Chouteau and I-35 Interchange:			
Construction and physical improvements to prepare for development, involving earthwork, utilities, and changes in the public right-of-way	25	1,000,000	25,000,000
Front Street I-435 to I-35⁽¹⁾			
Reconstruction of Front Street from Chouteau to Universal	25	11,700,000	292,500,000
75th and Wornall Traffic Study⁽²⁾			
Reconstruct Wornall Road from 74th to 79th Street	25	7,600,000	190,000,000
Paseo Gateway Intersection:			
Construction and physical improvements to prepare for development, involving earthwork, utilities, and changes in the public right-of-way	25	2,000,000	50,000,000
Red Bridge from Holmes to Wornall:			
Construction and physical improvements to prepare for development, involving earthwork, utilities, and changes in the public right-of-way	25	2,600,000	65,000,000

Public Infrastructure:			
			-
19-20 CWA North of Missouri River - Replace sidewalk, drive approaches, curb and gutter	30	2,000,000	60,000,000
19-20 CWA South of Missouri River - Replace sidewalk, drive approaches, curb and gutter	30	2,100,000	63,000,000
Citywide Sidewalk Repair - Replace sidewalk, drive approaches, curb and gutter	30	900,000	27,000,000
Parvin and Prather Intersection			
Construction of intersection improvements	50	700,000	35,000,000
Prospect Max			
Barney Allis Plaza to Prospect @75th Street - Construct 48 stations including concrete pad, sidewalks, concrete pavement, bike racks, ADA	20	669,600	13,392,000
Mapewoods Parkway from NE 96th to Anne Garney Park			
Construction, physical improvements to the Prospect Area to prepare for development including earthwork, utilities, and changes in the public right-of-way	25	600,000	15,000,000
Noland & 350 Highway			
Design of the roadway improvements and purchase of properties and relocation of existing businesses	25	1,000,000	25,000,000
NW Prairie View - 62nd to 64th			
Construction and inspection of the roadway improvements	25	2,000,000	50,000,000
Beardsley Road Bridge Repairs			
Construction and inspection of the Bridge improvements	50	1,500,000	75,000,000
Gregory Boulevard Bridge			
Construction and inspection of the roadway improvements	50	850,000	42,500,000

Flood Control:

Swope Park Industrial Area Levee	100	4,550,000	455,000,000
Dodson Industrial District Levee	100	3,788,925	378,892,500
Turkey Creek - Missouri Hillside Interceptor	100	3,831,902	383,190,200
Indian Creek Buyouts	100	800,000	80,000,000
Municipal Arts Commission	100	173,000	17,300,000
Animal Shelter	50	11,000,000	550,000,000

Community Centers: Line Creek, Gregg-Klice, Marlborough, Westport-Roanoke

Remedy all ADA violations	30	1,400,000	42,000,000
Municipal Arts Commission	30	106,000	3,180,000
Municipal Art Commission	50	452,000	22,600,000

		63,321,426	2,960,554,700
Less land costs		-	
Net costs, excluding land		63,321,426	

Original Average, Reasonably Expected Economic Life:		46.75 years
120% of Original Economic Life	120%	56.11 years

2020 Bond Proceeds Allocated to Project Costs	51,621,426	81.52%
Other Money Allocated to Project Costs	11,700,000	18.48%
Total Project Costs	63,321,426	100.00%

⁽¹⁾The Front Street I-435 to I-35 project is expected to be comprised of \$3,500,000 of Series 2020A Bond Proceeds; \$4,000,000 of Universal TIF funds; \$1,200,000 of Special Obligation Bond Proceeds; and \$3,000,000 of Surface Transportation Grant funds.

⁽²⁾The 75th and Wornall Traffic Study to 79th Street project is expected to be comprised of \$4,100,000 of Series 2020A Bond Proceeds; \$2,100,000 of Surface Transportation Grant funds; and \$1,400,000 of funds from the Smart Sewer Program.

City of Kansas City, Missouri
General Obligation Bonds
Series 2020A

List of Reimbursement Expenditures

Date Paid	Vendor	Project	Amount
4/12/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	400,658.76
4/30/2019	Holiday Pay	Front Street I-435 to I-35	608.13
4/30/2019	Wages-Reg Full Time Employees	Front Street I-435 to I-35	19,388.99
5/22/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	1,543,074.70
6/17/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	1,172,328.69
7/1/2019	Construction By Contractor	Prospect Max	6,958.50
7/19/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	1,563,049.39
7/26/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	109.08
8/13/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	2,202,753.34
9/6/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	397.02
9/20/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	323.70
10/1/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	1,799,308.75
10/4/2019	Construction By Contractor	Prospect Max	2,000.00
10/4/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	109.08
10/21/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	31.00
10/25/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
10/25/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
10/29/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
11/5/2019	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	1,457,329.69
11/7/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
11/15/2019	MO DOT	Parvin Road at Prather	700,000.00
11/15/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	286.16
11/22/2019	L.G. BARCUS AND SONS INC	Beardsley Road Bridge Repairs	223,646.34
12/2/2019	NATIONAL STREETSCAPE INC	Animal Shelter	74,405.00
12/4/2019	BARTLETT & WEST INC	(RFQ) for Sidewalk Inspection	35,000.00
12/4/2019	BARTLETT & WEST INC	(RFQ) for Sidewalk Inspection	40,000.00
12/11/2019	L.G. BARCUS AND SONS INC	Beardsley Road Bridge Repairs	427,432.50
12/13/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	166.89

Date Paid	Vendor	Project	Amount
12/13/2019	Holiday Pay	(RFQ) for Sidewalk Inspection	890.12
12/23/2019	H W LOCHNER INC	Maple Woods	5,056.25
12/23/2019	H W LOCHNER INC	Maple Woods	12,670.00
12/23/2019	H W LOCHNER INC	Maple Woods	36,540.15
12/23/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	4.00
12/23/2019	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	24.00
12/27/2019	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	667.67
1/3/2020	BARTLETT & WEST INC	(RFQ) for Sidewalk Inspection	25,000.00
1/10/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	166.89
1/22/2020	L.G. BARCUS AND SONS INC	Beardsley Road Bridge Repairs	50,750.00
1/24/2020	H W LOCHNER INC	Maple Woods	19,916.39
1/24/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	278.16
1/31/2020	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
1/31/2020	Printing-Duplicating-Multilith	19-20 CWA N of Mo River	190.90
1/31/2020	Printing-Duplicating-Multilith	19-20 CWA S of the Mo river	190.30
2/4/2020	KANSAS CITY CAMPUS FOR ANIMAL CARE	Animal Shelter	646,495.68
2/7/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	111.27
2/10/2020	H W LOCHNER INC	Maple Woods	8,037.50
2/12/2020	HDC CONSULTING GROUP INC	75th and Wornall Traffic Study	5,925.00
2/18/2020	NATIONAL STREETSCAPE INC	Animal Shelter	27,545.00
2/19/2020	L.G. BARCUS AND SONS INC	Beardsley Road Bridge Repairs	57,236.69
2/19/2020	KELLER CRAIG & ASSOCIATES	75th and Wornall Traffic Study	24,500.00
2/21/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	536.55
2/21/2020	Wages-Reg Full Time Employees	19-20 CWA N of Mo River	143.08
2/28/2020	DENTON EXCAVATING INC	Washington St Flood Buyout	25,000.00
3/1/2020	Flood Control Project*		12,170,826.00
3/6/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	656.73
3/6/2020	Wages-Reg Full Time Employees	19-20 CWA N of Mo River	291.87
3/18/2020	STANDARD & POOR'S FINANCIAL SERVICES LLC		29,250.00
3/18/2020	ADVANTAGE PROJECT MANAGEMENT INC	Noland & 350 Highway	1,020.00
3/20/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	583.76
3/20/2020	BARTLETT & WEST INC	(RFQ) for Sidewalk Inspection	10,000.00

Date Paid	Vendor	Project	Amount
3/20/2020	Wages-Reg Full Time Employees	19-20 CWA N of Mo River	145.93
3/25/2020	HDC CONSULTING GROUP INC	75th and Wornall Traffic Study	5,925.00
4/3/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	474.30
4/7/2020	ADVANTAGE PROJECT MANAGEMENT INC	Noland & 350 Highway	1,530.00
4/8/2020	H W LOCHNER INC	Maple Woods	12,281.25
4/8/2020	H W LOCHNER INC	Maple Woods	26,849.52
4/8/2020	L.G. BARCUS AND SONS INC	Beardsley Road Bridge Repairs	44,730.00
4/17/2020	Wages-Reg Full Time Employees	(RFQ) for Sidewalk Inspection	607.12
4/22/2020	Bond Issue Cost		61.51
4/23/2020	MOBILIS TECHNOLOGIES LLC	75th and Wornall Traffic Study	28.00
4/28/2020	BARTLETT & WEST INC	(RFQ) for Sidewalk Inspection	20,000.00
Total Amount to be Reimbursed from Bond Proceeds \$			24,942,642.30

Flood Control Project*:			
8/1/2017	US Army Corps of Engineers	Turkey Creek/Dodson Industrial	2,627,850.00
8/1/2017	US Army Corps of Engineers	Turkey Creek/Dodson Industrial	4,950,000.00
8/1/2017	US Army Corps of Engineers	Turkey Creek/Dodson Industrial	331,000.00
8/1/2017	US Army Corps of Engineers	Turkey Creek/Dodson Industrial	7,332,803.25
3/26/2018	Construction By Contractor	Turkey Creek/Dodson Industrial	(500,000.00)
3/26/2018	Construction By Contractor	Turkey Creek/Dodson Industrial	500,000.00
3/31/2018	Construction By Contractor	Turkey Creek/Dodson Industrial	(500,000.00)
4/30/2018	Life Insurance	Turkey Creek/Dodson Industrial	6.74
4/30/2018	Medical Insurance	Turkey Creek/Dodson Industrial	472.68
4/30/2018	FICA Benefits-City	Turkey Creek/Dodson Industrial	530.06
4/30/2018	Work-Out-Of-Class	Turkey Creek/Dodson Industrial	891.08
4/30/2018	Employee Pension	Turkey Creek/Dodson Industrial	1,057.46
4/30/2018	Wages-Reg Full Time Employees	Turkey Creek/Dodson Industrial	21,146.71
5/15/2018	VSM Engineering LLC	Turkey Creek/Dodson Industrial	8,591.04
6/6/2018	KCPL	Turkey Creek/Dodson Industrial	87,500.00
7/31/2018	US Army Corps of Engineers	Swope Industrial Park	6,001,200.00
8/29/2018	Donoho Appraisals	Swope Industrial Park	1,500.00
9/11/2018	VSM Engineering LLC	Turkey Creek/Dodson Industrial	7,758.08

Date Paid	Vendor	Project	Amount
9/14/2018	Trekk Design Group	Swope Industrial Park	625.00
10/18/2018	Mobilis Technologies LLC	Turkey Creek/Dodson Industrial	55.00
10/24/2018	Mobilis Technologies LLC	Turkey Creek/Dodson Industrial	67.00
10/24/2018	Mobilis Technologies LLC	Turkey Creek/Dodson Industrial	67.00
10/24/2018	Mobilis Technologies LLC	Turkey Creek/Dodson Industrial	79.00
10/25/2018	New Horizons Enterprises LLC	Turkey Creek/Dodson Industrial	97,070.00
11/19/2018	Trekk Design Group	Swope Industrial Park	8,766.32
11/28/2018	Mobilis Technologies LLC	Turkey Creek/Dodson Industrial	49.00
1/11/2019	First American Title Ins. Co.	Swope Industrial Park	534.00
1/11/2019	First American Title Ins. Co.	Swope Industrial Park	4,709.80
1/11/2019	First American Title Ins. Co.	Swope Industrial Park	16,243.20
1/11/2019	First American Title Ins. Co.	Swope Industrial Park	35,313.00
1/23/2019	First American Title Ins. Co.	Swope Industrial Park	1,517.75
1/25/2019	First American Title Ins. Co.	Swope Industrial Park	33,660.00
2/1/2019	New Horizons Enterprises LLC	Turkey Creek/Dodson Industrial	1,500.00
2/26/2019	US Army Corps of Engineers	Swope Industrial Park	1,000,000.00
3/8/2019	First American Title Ins. Co.	Swope Industrial Park	1,389.25
4/3/2019	KCPL	Turkey Creek/Dodson Industrial	87,500.00
4/30/2019	Life Insurance	Turkey Creek/Dodson Industrial	5.50
4/30/2019	FICA Benefits-City	Turkey Creek/Dodson Industrial	395.71
4/30/2019	Employee Pension	Turkey Creek/Dodson Industrial	870.75
4/30/2019	Medical Insurance	Turkey Creek/Dodson Industrial	1,804.45
4/30/2019	Wages-Reg Full Time Employees	Turkey Creek/Dodson Industrial	27,466.77
4/30/2019	Life Insurance	Swope Industrial Park	16.04
4/30/2019	Extra Compensation-FLSA Rate	Swope Industrial Park	39.05
4/30/2019	FICA Benefits-City	Swope Industrial Park	1,164.48
4/30/2019	Employee Pension	Swope Industrial Park	2,769.51
4/30/2019	Medical Insurance	Swope Industrial Park	5,639.18
4/30/2019	Wages-Reg Full Time Employees	Swope Industrial Park	27,080.89
7/5/2019	Mark One Electric Company	Turkey Creek/Dodson Industrial	22,585.00
12/4/2019	Union Pacific Railroad Co	Swope Industrial Park	3,934.20
1/23/2020	Hanson Professional Services Inc.	Swope Industrial Park	3,750.27

Date Paid	Vendor	Project	Amount
1/24/2020	Union Pacific Railroad Co	Swope Industrial Park	300.79
2/6/2020	Hanson Professional Services Inc.	Swope Industrial Park	6,303.53
2/21/2020	Hanson Professional Services Inc.	Swope Industrial Park	20,987.86
2/28/2020	Denton Excavating Inc.	Turkey Creek/Dodson Industrial	4,990.00
3/25/2020	Hanson Professional Services Inc.	Swope Industrial Park	32,316.40
4/8/2020	Union Pacific Railroad Co	Swope Industrial Park	411.11
4/17/2020	Hanson Professional Services Inc.	Swope Industrial Park	25,058.84
Total Flood Control Project Expenditures \$			22,349,342.75

*\$12,170,826.00 of the total flood control project expenditures will be reimbursed from Series 2020A Bond proceeds.

EXHIBIT E

SAMPLE ANNUAL COMPLIANCE CHECKLIST

Name of tax-exempt bonds (“Bonds”) financing	\$43,360,000 General Obligation Bonds, Series 2020A
Financed Facility:	
Issue Date of Bonds:	April 29, 2020
Placed in service date of Financed Facility:	
Name of Bond Compliance Officer:	
Period covered by request (“Annual Period”):	

Item	Question	Response
1 Ownership	Was the entire Financed Facility owned by the City during the entire Annual Period?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If answer above was “No,” was advice of Bond Counsel obtained prior to the transfer?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If Yes, include a description of the advice in the Tax-Exempt Bond File.	
	If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.	

Item	Question	Response
2 Leases & Other Rights to Possession	During the Annual Period, was any part of the Financed Facility leased at any time pursuant to a lease or similar agreement for more than 50 days?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If answer above was “Yes,” was advice of Bond Counsel obtained prior to entering into the lease or other arrangement?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If Yes, include a description of the advice in the Tax-Exempt Bond File.	
	If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.	

Item	Question	Response
3 Management or Service Agreements	During the Annual Period, has the management of all or any part of the operations of the Financed Facility (e.g., cafeteria, gift shop, etc.) been assumed by or transferred to another entity?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If answer above was "Yes," was advice of Bond Counsel obtained prior to entering into the Management or Service Agreement? If Yes, include a description of the advice in the Tax-Exempt Bond File. If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Item	Question	Response
4 Other Use	Was any other agreement entered into with an individual or entity that grants special legal rights to the Financed Facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If answer above was "Yes," was advice of Bond Counsel obtained prior to entering into the agreement? If Yes, include a description of the advice in the Tax-Exempt Bond File. If No, contact Bond Counsel and include description of resolution in the Tax-Exempt Bond File.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Item	Question	Response
5 Arbitrage & Rebate	Have all rebate and yield reduction calculations mandated in the Federal Tax Certificate been prepared for the current year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If No, contact Rebate Analyst and incorporate report or include description of resolution in the Tax-Exempt Bond File.	

Bond Compliance Officer: _____

Date Completed: _____

EXHIBIT F

CERTIFICATES OF DEPARTMENT HEADS

CERTIFICATE OF DIRECTOR OF GENERAL SERVICES

\$43,360,000
CITY OF KANSAS CITY, MISSOURI
GENERAL OBLIGATION BONDS
SERIES 2020A
(THE "BONDS")

The undersigned Director of General Services for Kansas City, Missouri, or other City officer authorized to execute this Certificate by the Director of General Services for Kansas City, Missouri, understands that in the Federal Tax Certificate of the City that the City's Director of Finance is making certain certifications with respect to the use and expenditure of the proceeds of the above-referenced Bonds. The undersigned is executing this Certificate in order to assist the City's Director of Finance in making such certifications and the undersigned hereby certifies as follows:

1. Project to be Financed with Bond Proceeds. Approximately \$2,131,000.00 of the proceeds of the Bonds and the investment earnings thereon are to be used to finance the projects listed on **Exhibit A** hereto.

2. Expenditure of Bond Proceeds. The projects are expected to proceed with due diligence and be completed by the respective dates set forth on **Exhibit A** hereto, with at least 85% of the net sale proceeds of the Bonds for such projects expended by such date. The City has entered into, or will enter into within six months after the date hereof, binding contracts obligating the expenditure of at least 5% of the net sale proceeds of the Bonds with respect to the projects listed on **Exhibit A** hereto.

[Remainder of Page Intentionally Left Blank]

DATED: April 29, 2020.

By: Yolanda McKinzy 4/21/2020
Name: Yolanda McKinzy
Title: Acting Director of General Services

**EXHIBIT A TO
CERTIFICATE OF DIRECTOR OF GENERAL SERVICES**

<u>Project</u>	<u>Amount</u>	<u>Expected Completion Date</u>
Municipal Art Commission (Q1)	\$452,000.00	FYE 2023
Municipal Art Commission (Q2)	\$173,000.00	FYE 2023
Municipal Art Commission (Q3)	\$106,000.00	FYE 2023
Community Centers: Line Creek, Gregg-Klice, Marlborough, Westport-Roanoke: Remedy all ADA violations (7009996)	<u>\$1,400,000.00</u>	October 2021
TOTAL	<u>\$2,131,000.00</u>	

CERTIFICATE OF DIRECTOR OF PARKS AND RECREATION

**\$43,360,000
CITY OF KANSAS CITY, MISSOURI
GENERAL OBLIGATION BONDS
SERIES 2020A
(THE "BONDS")**

The undersigned Director of Parks and Recreation for Kansas City, Missouri, or other City officer authorized to execute this Certificate by the Director of Parks and Recreation for Kansas City, Missouri, understands that in the Federal Tax Certificate of the City that the City's Director of Finance is making certain certifications with respect to the use and expenditure of the proceeds of the above-referenced Bonds. The undersigned is executing this Certificate in order to assist the City's Director of Finance in making such certifications and the undersigned hereby certifies as follows:

1. Project to be Financed with Bond Proceeds. Approximately \$17,200,000.00 of the proceeds of the Bonds and the investment earnings thereon are to be used to finance the projects listed on **Exhibit A** hereto.

2. Expenditure of Bond Proceeds. The projects are expected to proceed with due diligence and be completed by the respective dates set forth on **Exhibit A** hereto, with at least 85% of the net sale proceeds of the Bonds for such projects expended by such date. The City has entered into, or will enter into within six months after the date hereof, binding contracts obligating the expenditure of at least 5% of the net sale proceeds of the Bonds with respect to the projects listed on **Exhibit A** hereto.

[Remainder of Page Intentionally Left Blank]

DATED: April 29, 2020.

By: 
Name: Teresa Rynard
Title: Director of Parks and Recreation

**EXHIBIT A TO
CERTIFICATE OF DIRECTOR OF PARKS AND RECREATION**

<u>Project</u>	<u>Amount</u>	<u>Expected Completion Date</u>
Maple Woods (70182903)	\$600,000.00	November 15 th , 2021
Paseo Gateway (70172207)	\$2,000,000.00	November 30 th , 2022
Red Bridge Road/Holmes/Wornall (70192304)	\$2,600,000.00	October 30 th , 2022
Animal Shelter (70185200)	\$11,000,000.00	December 30 th , 2019
Chouteau Parkway and I-35 - Construction and physical improvements to prepare for development, involving earthwork, utilities, and changes in the public right-of-way (70008822)	\$1,000,000.00	December 30 th , 2021
TOTAL	<u>\$17,200,000.00</u>	

CERTIFICATE OF DIRECTOR OF PUBLIC WORKS

**\$43,360,000
CITY OF KANSAS CITY, MISSOURI
GENERAL OBLIGATION BONDS
SERIES 2020A
(THE "BONDS")**

The undersigned Director of Public Works for Kansas City, Missouri, or other City officer authorized to execute this Certificate by the Director of Public Works for Kansas City, Missouri, understands that in the Federal Tax Certificate of the City that the City's Director of Finance is making certain certifications with respect to the use and expenditure of the proceeds of the above-referenced Bonds. The undersigned is executing this Certificate in order to assist the City's Director of Finance in making such certifications and the undersigned hereby certifies as follows:

1. Project to be Financed with Bond Proceeds. Approximately \$19,344,600.00 of the proceeds of the Bonds and the investment earnings thereon are to be used to finance the projects listed on **Exhibit A** hereto.

2. Expenditure of Bond Proceeds. The projects are expected to proceed with due diligence and be completed by the respective dates set forth on **Exhibit A** hereto, with at least 85% of the net sale proceeds of the Bonds for such projects expended by such date. The City has entered into, or will enter into within six months after the date hereof, binding contracts obligating the expenditure of at least 5% of the net sale proceeds of the Bonds with respect to the projects listed on **Exhibit A** hereto.

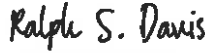
[Remainder of Page Intentionally Left Blank]

DATED: April 29, 2020.

DocuSigned by:
Ralph S. Davis
B70311B92EAF4DE

By: _____
Name: Ralph Davis
Title: Acting Director of Public Works

<u>Project</u>	<u>Amount</u>	<u>Expected Completion Date</u>
(RFQ) for Sidewalk Inspection (89022011)	\$540,100	Dec. 2020
19-20 CWA North of Missouri River (89060763)	\$2,000,000	May 2021
19-20 CWA South of Missouri River (89060799)	\$2,100,000	May 2021
75th and Wornall Traffic Study (89008516)	\$4,100,000	Dec. 2022
Beardsley Road Bridge Repairs (89005585)	\$1,500,000	July 2020
Front Street I-435 to I-35 (89008088)	\$3,500,000	April 2022
GOBond Citywide Sidewalk (89060525)	\$359,900	Dec 2021
Gregory Boulevard Bridge (89008587)	\$850,000	Sept 2022
Noland & 350 Highway (89008226)	\$1,000,000	Jan. 2023
NW Prairie View - 62nd to 64 th (89008182)	\$2,000,000	October 2021
Parvin Road and Prather Intersection (89008821)	\$700,000	Nov. 2020
Prospect Max (89020330)	\$669,600	Oct. 2019
Indian Creek Buyouts-Curbs and Sidewalks	\$25,000	March 2020
TOTAL	<u><u>\$19,344,600</u></u>	

DocuSigned by:

 B70311B82EAF4DE...

4/22/2020

CERTIFICATE OF DIRECTOR OF WATER SERVICES

**\$43,360,000
CITY OF KANSAS CITY, MISSOURI
GENERAL OBLIGATION BONDS
SERIES 2020A
(THE "BONDS")**


The undersigned Director of Water Services for Kansas City, Missouri, or other City officer authorized to execute this Certificate by the Director of Water Services for Kansas City, Missouri, understands that in the Federal Tax Certificate of the City that the City's Director of Finance is making certain certifications with respect to the use and expenditure of the proceeds of the above-referenced Bonds. The undersigned is executing this Certificate in order to assist the City's Director of Finance in making such certifications and the undersigned hereby certifies as follows:

1. Project to be Financed with Bond Proceeds. Approximately \$12,945,827.00 of the proceeds of the Bonds and the investment earnings thereon are to be used to finance the projects listed on **Exhibit A** hereto.

2. Expenditure of Bond Proceeds. The projects are expected to proceed with due diligence and be completed by the respective dates set forth on **Exhibit A** hereto, with at least 85% of the net sale proceeds of the Bonds for such projects expended by such date. The City has entered into, or will enter into within six months after the date hereof, binding contracts obligating the expenditure of at least 5% of the net sale proceeds of the Bonds with respect to the projects listed on **Exhibit A** hereto.

[Remainder of Page Intentionally Left Blank]

DATED: April 29, 2020.

By: 
Name: Terry Leeds
Title: Director of Water Services

**EXHIBIT A TO
CERTIFICATE OF DIRECTOR OF WATER SERVICES**

<u>Project</u>	<u>Amount</u>	<u>Expected Completion Date</u>
Turkey Creek Flood Control - MO Hillside Interceptor (89003209)	\$3,831,902.00	05/11/2021
Dodson Industrial District – Levee (89001535)	\$3,788,925.00	09/29/2020
Swope Park Industrial District (89002672)	\$4,550,000.00	03/13/2023
Indian Creek Buyouts (89020393)	<u>\$775,000.00</u>	12/01/2021
TOTAL	<u>\$12,945,827.00</u>	

EXHIBIT G

SAMPLE FINAL WRITTEN ALLOCATION

\$43,360,000

**City of Kansas City, Missouri
General Obligation Bonds
Series 2020A**

Final Written Allocation

The undersigned is the Bond Compliance Officer of the City of Kansas City, Missouri (the “City”) and in that capacity is authorized to execute federal income tax returns required to be filed by the City and to make appropriate elections and designations regarding federal income tax matters on behalf of the City. This allocation of the proceeds of the bond issue referenced above (the “Bonds”) is necessary for the City to satisfy ongoing reporting and compliance requirements under federal income tax laws.

Purpose. This document, together with the schedules and records referred to below, is intended to memorialize allocations of Bond proceeds to expenditures for purposes of §§ 141 and 148 of the Internal Revenue Code (the “Code”). All allocations are or were previously made no later than 18 months following the date the expenditure was made by the City or, if later, the date the “project” was “placed in service” (both as defined below), and no later than 60 days following the 5th anniversary of the issue date of the Bonds.

Background. The Bonds were issued on April 9, 2020 (the “Issue Date”), by the City of Kansas City, Missouri (the “City”). The Bonds were issued in order to provide funds needed to construct, equip and furnish sidewalks, bridges, streets, flood control projects and an animal shelter (the “Project”). The Bonds were issued pursuant to an Ordinance of the City. Proceeds of the Bonds were deposited to the following accounts:

- Project Fund
- Costs of Issuance Account
- Compliance Account

Sources Used to Fund Project Costs and Allocation of Proceeds to Project Costs. A portion of the costs of the Project was paid from sale proceeds of the Bonds and the remaining portion of the costs of the Project was paid from earnings from the investment of bond sale proceeds [and from other money of the City] as shown on **Schedule 1** to this Final Written Allocation.

Identification of Financed Assets. The portions of the Project financed from Bond proceeds (i.e., the “Financed Facility” referenced in the Federal Tax Certificate) are listed on page 1 of **Schedule 2** to this Final Written Allocation.

Identification and Timing of Expenditures for Arbitrage Purposes. For purposes of complying with the arbitrage rules, the City allocates the proceeds of the Bonds to the various expenditures described in the invoices, requisitions or other substantiation attached as **Schedule 2** to this Final Written Allocation. In each case, the cost requisitioned was either paid directly to a third party or reimbursed the City for an amount it had previously paid or incurred. Amounts received from the sale of the Bonds and

retained as underwriters discount are allocated to that purpose and spent on the Issue Date. Amounts allocated to interest expense are treated as paid on the interest payment dates for the Bonds.

Placed In Service. The Project was “placed in service” on the date set out on **Schedule 2** to this Final Written Allocation. For this purpose, the assets are considered to be “placed in service” as of the date on which, based on all the facts and circumstances: (a) the constructing and equipping of the asset has reached a degree of completion which would permit its operation at substantially its design level; and (b) the asset is, in fact, in operation at that level.

This allocation has been prepared based on statutes and regulations existing as of this date. The City reserves the right to amend this allocation to the extent permitted by future Treasury Regulations or similar authorities.

CITY OF KANSAS CITY, MISSOURI

By: _____
Title: _____

Dated: _____

Name of Legal Counsel/Law Firm Reviewing Final Written Allocation:

Date of Review: _____

**SCHEDULE 1
TO FINAL WRITTEN ALLOCATION**

ALLOCATION OF SOURCES AND USES

**SCHEDULE 2
TO FINAL WRITTEN ALLOCATION**

**IDENTIFICATION OF PROJECT ASSETS
&
DETAILED LISTING OF EXPENDITURES**