

RESOLUTION RELATING TO FINANCING OF CERTAIN PROPOSED PROJECTS TO BE UNDERTAKEN BY: Woodbury Leadership Academy school]; ESTABLISHING COMPLIANCE WITH REIMBURSEMENT BOND REGULATIONS UNDER THE INTERNAL REVENUE CODE.

Member Jason Livingston introduced the following resolution and moved its adoption, which motion was seconded by Member Ro Krejai :

BE IT RESOLVED by the Board of Directors [Board of Directors, Board of Trustees or School Board] (the Board) of Woodbury Leadership Academy [name of city & state] (the Charter School) as follows:

1. Recitals.

- (a) The Internal Revenue Service has issued Section 1.150-2 of the Income Tax Regulations (the "Regulations") dealing with the issuance of obligations, all or a portion of the proceeds of which are to be used to reimburse the Charter School for project expenditures made by the Charter School prior to the date of issuance.
- (b) The Regulations generally require that the Charter School make a declaration of its official intent to reimburse itself for such prior expenditures out of the proceeds of a subsequently issued series of obligations within 60 days after payment of the expenditures, that the obligations be issued and the reimbursement allocation be made from the proceeds of such obligations within the reimbursement period (as defined in the Regulations), and that the expenditures reimbursed be capital expenditures or costs of issuance of the obligations.
- (c) The Charter School desires to comply with requirements of the Regulations with respect to certain projects hereinafter identified.

2. Official Intent Declaration.

- (a) The Charter School proposes to undertake the following project or projects and to make original expenditures with respect thereto prior to the issuance of reimbursement obligations, and reasonably expects to issue reimbursement obligations for such project or projects in the maximum principal amounts shown below:

<u>Projects</u>	<u>Maximum Amount of Obligations Expected to be Issued for Projects</u>
Acquisition and betterment of school facilities	<u>\$16.5m</u>

- (b) Other than (i) de minimis amounts permitted to be reimbursed pursuant to Section 1.150-2(f)(1) of the Regulations or (ii) expenditures constituting preliminary expenditures as defined in Section 1.150-2(f)(2) of the Regulations, the Charter School will not seek reimbursement for any original expenditures with respect to the foregoing projects paid more than 60 days prior to the date of adoption of this resolution. All original expenditures for which reimbursement is sought will be capital expenditures or costs of issuance of the reimbursement obligations.

3. Budgetary Matters. As of the date hereof, there are no Charter School funds reserved, pledged, allocated on a long term basis or otherwise set aside (or reasonably expected to be reserved, pledged, allocated on a long term basis or otherwise set aside) to provide permanent financing for the original expenditures related to the projects, other than pursuant to the issuance of the reimbursement obligations. Consequently, it is not expected that the issuance of the reimbursement obligations will result in the creation of any replacement proceeds.

4. Reimbursement Allocations. The Charter School's financial officer shall be responsible for making the "reimbursement allocations" described in the Regulations, being generally the transfer of the appropriate amount of proceeds of the reimbursement obligations to reimburse the source of temporary financing used by the Charter School to make payment of the original expenditures relating to the projects. Each reimbursement allocation shall be made within 30 days of the date of issuance of the reimbursement obligations, shall be evidenced by an entry on the official books and records of the Charter School maintained for the reimbursement obligations and shall specifically identify the original expenditures being reimbursed.

Upon vote being taken thereon, the following voted in favor thereof: *Jessica Erickson, Mandi Folks, Claudia George, Shannon Kelly, Ro Krejci, Jason Livingston & Jolene Skordahl*  
and the following voted against the same: *none*

whereupon the resolution was declared duly passed and adopted.

*May 22, 2019*