

CERTIFICATE OF  
COUNTY OF UNION, ILLINOIS  
RE: ARBITRAGE AND FEDERAL TAX MATTERS

STATE OF ILLINOIS            )  
                                          ) SS:  
COUNTY OF UNION            )

We, the undersigned, certify that we are the duly elected or appointed officials of the County of Union, Illinois (the "County"), holding the offices appearing under our names, are the officials under whose jurisdiction the proceeds of the hereinafter defined Bonds will be expended; are authorized to execute this certificate on behalf of the County; and are officers of the County charged by the Ordinance, adopted September 7, 2010, and the Bond Order, dated September 20, 2010 (together, the "Ordinance") of the County with actually issuing said Bonds. The Bonds shall be issued as Taxable General Obligation Bonds (Alternate Revenue Source), Series 2010B (Build America Bonds (Direct Payment)) and in the form of Build America Bonds (Direct Pay Option) and "qualified bonds" under Section 54AA(d) and (g) of the Code (as hereinafter defined). We further certify that:

1.     Applicable Laws. This certificate is executed for, among other matters, the purpose of setting forth the covenants, facts and estimates upon which the County represents that the Bonds are not arbitrage bonds under (i) Section 148 of the Internal Revenue Code as in effect on this date (the "Code") and (ii) Sections 1.148-0 through 11, 1.149(b)-1, 1.149(d)1, 1.149(e)-1, 1.149(g)-1 and 1.150-1 through 1.150-2 of the Treasury Regulations as in effect on this date (the "Regulations") and for the purpose of establishing the requirements contained in Section 54AA (d) and (g) of the Code. Unless otherwise indicated by the context in which they are used, words and phrases used herein have the meaning ascribed to them in the Regulations.

2. Summary of Financing. We are cognizant of the facts and circumstances regarding the issuance of general obligation bonds of the County designated "Taxable General Obligation Bonds (Alternate Revenue Source), Series 2010B (Build America Bonds (Direct Payment))" (the "Bonds"), dated September 29, 2010, and the intended use of the proceeds to (i) finance the costs of certain capital projects within the County, including, but not limited to, the construction and equipping of a new courthouse (the "Project"), (ii) the payment of capitalized interest on the Bonds prior to the "Placed-in-Service" date, and (iii) pay certain costs associated with the issuance of the Bonds. For purposes of this Certificate, the term "Placed-in-Service" means, with respect to a facility, the date on which, based on all the facts and circumstances, (i) the facility has reached a degree of completion which would permit its operation at substantially its design level, and (ii) the facility is, in fact, in operation at such level. The Placed-in-Service date for the Project is expected to be no earlier than September 1, 2012. The County further represents that at least 75% of the proceeds received from the sale of the Bonds, including investment earnings thereon will be used to pay construction expenditures within the meaning of Section 148(f)(4)(C) of the Code.

3. Sale Proceeds. The County has sold the Bonds to Bernardi Securities, Inc. (the "Purchaser"). The purchase price for the Bonds is \$12,635,000 (at par) (the "Sale Proceeds").

4. Disposition of Sale Proceeds. (a) The County expects that Sale Proceeds of the Bonds shall be used to finance the costs of the Project (including capitalizable interest) and finance costs of issuance in the manner described in Exhibit A.

(b) The County expects to pay not more than \$252,700.00 in issuance expenses from Sale Proceeds of the Bonds (including investment earnings thereon). Costs of issuance payable from proceeds of the Bonds will not exceed 2% of the par amount of the Bonds and are expected

to be spent within thirty (30) days of the date hereof. No investment earnings or Sale Proceeds will be used to pay costs of issuance of the Bonds to the extent such payment would cause the aggregate amount of costs of issuance paid with proceeds of the Bonds to exceed \$252,700.00. Any funds held for costs of issuance which are not spent within one year will be invested at a yield no greater than the yield on the Bonds.

5. Project Fund and Capitalized Interest Fund. The County expects that Sale Proceeds held in the Project Fund and the Capitalized Interest Fund shall be used to finance the costs of capital expenditures (including capitalizable interest) for the Project at the time and in the manner described in Exhibit B. The County represents and covenants that:

(a) Except for certain architectural, construction management and other capital expenditures that constitute "preliminary expenditures" under Section 1.150-2 of the Regulations, none of the Sale Proceeds will be used to reimburse the County for costs of the Project paid by the County prior to the issuance of the Bonds.

(b) Substantial binding obligations to third parties to commence the Project have been or will be incurred by entering into construction contracts for the Project in an amount not less than \$632,000 by March 28, 2011. This amount accounts for at least 5% of the Sale Proceeds.

(c) Based upon the expected construction period for the Project and expectations for the expenditure of the Sale Proceeds as set forth in the drawdown schedule attached hereto as Exhibit B, the County reasonably expects that at least eighty-five percent (85%) of the Sale Proceeds will be expended on costs of the Project (including capitalizable interest and costs of issuance) within the 3-year period from September 29, 2010 through September 29, 2013.

(d) Based upon the drawdown schedule set forth in Exhibit B, the County reasonably expects the expenditure test of Section 1.148-2(e)(2)(i)(A) of the Regulations to be met for the Bonds.

(e) Based upon the above, the County reasonably expects that work on the Project will proceed with due diligence, as defined in Section 1.148-2(e)(2)(i)(C) of the Regulations, to completion, presently expected on or about September 29, 2013, and that the allocation of the Sale Proceeds in the Project Fund to these expenditures will occur as these expenditures are paid. The Bonds are being issued at this time to begin the construction schedule of the County and to comply with the provisions of the Code.

(f) The Sale Proceeds, together with the investment earnings thereon, will not exceed the amounts necessary for the purpose or purposes of the Bonds, as shown in Exhibit A. Any amounts remaining in the Project Fund or the Capitalized Interest Fund upon completion of the Project (except for moneys reserved to pay disputed or unpaid claims) will be used to pay other capital project costs of the County.

(g) Based upon the above, the County reasonably expects that the Project Fund will qualify for the temporary period described in Section 1.148-2(e)(2) of the Regulations and moneys in such fund may be invested at an unrestricted yield prior to the earlier of September 29, 2013 or the completion date of the Project.

(h) Any direct payment credits received by the County relating to the interest payments made with respect to the Bonds on September 1, 2011 and March 1, 2012 will be deposited into the Bond Fund and fully used to make the interest payment coming due on September 1, 2012 with respect to the Bonds.

6. Calculation of Yield. (i) The yield on the Bonds is 4.42017% (the "Bond Yield") which has been calculated in accordance with the Regulations and the Code as shown on Schedule 2 to the Purchaser's Certificate attached hereto as Exhibit C. In calculating the Bond Yield, the County relied on information provided by the Purchaser, including certain representations of the Purchaser included in the Purchaser's Certificate attached hereto as Exhibit C. Additionally, the Bond Yield has been calculated taking into account the federal subsidy to be received on each interest payment date as required by Section 6431(c) of the Code. The combined yield on the Bonds and the Series 2010A Bonds (as defined in paragraph 13 hereof) has also been computed by the Purchaser on Schedule 2 to the Purchaser's Certificate attached hereto as Exhibit C by taking into account the payments of principal and interest on the Bonds and the Series 2010A Bonds less the applicable federal subsidies to be not less than 4.38764% (the "Combined Bond Yield").

7. Overissuance. Based upon the County's inquiries prior to adopting the Ordinance, the County reasonably expects that the Sale Proceeds of such issue of Bonds, plus income earned on the investment of the Sale Proceeds and income earned on the investment income, will not exceed the amount necessary for the purpose of such issue of the Bonds. The Ordinance requires those investment earnings also be expended on the purpose of the issue of the Bonds.

8. Excess Gross Proceeds. The County certifies that the issuance of the Bonds will not result in excess gross proceeds as that term is defined in Section 1.148-10(c)(2) of the Regulations in excess of 1% of Sale Proceeds.

9. Bond Fund. Principal of and interest on the Bonds due each year will be paid from (a) the one percent (1%) public facility sales tax that was approved via referendum on February 2, 2010 for purposes of public facilities, (b) the County's receipts of State of Illinois

Income Taxes and share of County Sales Taxes, distributed pursuant to applicable law, and (c) ad valorem taxes levied against all of the taxable property in the County which are to be deposited into the Bond Fund. It is reasonably expected that the amounts held in the Bond Fund to pay debt service in any given year will not exceed the amount of principal and interest on all Bonds payable for that year. The County expects that the deposits into the Bond Fund will not be held for more than thirteen (13) months and that such Fund will be depleted at least once a year to pay debt service on the Bonds except for a reasonable carryover which will not exceed the greater of 1/12 of annual debt service on the Bonds for the immediately preceding year or one year's earnings on such amounts for the immediately preceding year. Such Fund is designed to achieve a proper matching of the County's tax revenues and debt service on the Bonds within each bond year. Therefore, such Bond Fund constitutes a Bona Fide Debt Service Fund as to the Bonds under the Regulations, and such moneys will be invested without restriction as to yield.

10. Disposition of Investment Earnings. All investment earnings on Sale Proceeds of the Bonds will be used to pay capital expenditures (including capitalizable interest) and earnings, if any, on amounts deposited in the Bond Fund will be expended to pay debt service on the Bonds within one year of receipt.

11. Replacement Proceeds. (a) As set forth in the Purchaser's Certificate attached hereto as Exhibit C, the weighted average maturity of the Bonds is 20.253 years. The weighted average maturity for the Bonds does not exceed 120 percent of the average reasonably expected economic life of the financed capital projects (at least [30] years). Therefore, the County does not expect replacement proceeds to arise under Section 1.148-1(c)(4)(i)(A) of the Regulations.

(b) Other than the funds described above, there are no other funds or accounts of the County established pursuant to the Ordinance or otherwise, (i) which are reasonably expected to

be used to pay debt service on the Bonds or which are pledged as collateral to secure repayment of debt service on the Bonds, (ii) for which there is reasonable assurance that amounts therein will be available to pay debt service on the Bonds, or (iii) for which the County has agreed to maintain a particular balance for the direct or indirect benefit of the owners of the Bonds.

(c) No portion of the proceeds of the Bonds will be used as a substitute for other funds which would otherwise have been used to pay the principal of, premium, if any, or interest on the Bonds and which will be used directly or indirectly to acquire obligations producing a yield in excess of the Bond Yield on the Bonds (as defined in Section 6).

12. Artifice and Device. The County has not employed in connection with the issuance of the Bonds, a transaction or series of transactions that attempts to circumvent the provisions of the Code and the Regulations enabling the County to exploit the difference between tax-exempt and taxable interest rates to gain a material financial advantage and overburdening the market for tax exempt obligations through actions such as, but not limited to, issuing more obligations, issuing obligations sooner and allowing them to remain outstanding longer than would otherwise be reasonably necessary to accomplish the purpose of the Bonds.

13. Concurrent Issues. Except for the Series 2010A Bonds (as described below), and the Series 2010C Taxable Bonds which do not qualify as Build America Bonds, there are no other obligations of the County which (i) are sold at substantially the same time as the Bonds (within 15 days), (ii) are sold pursuant to the same plan of financing as the Bonds, and (iii) are reasonably expected to be paid out of substantially the same source of funds as the Bonds. The County's Taxable General Obligation Bonds (Alternate Revenue Source), Series 2010A (Recovery Zone Economic Development Bonds (Direct Payment)) (the "Series 2010A Bonds") and the Bonds (the "Combined Bonds") are treated as part of the same issue under Section 1.150-

1(c) of the Regulations for all purposes of Section 148 of the Code. The County is hereby electing to treat the Bonds and the Series 2010A Bonds as separate issues for all other provisions pursuant to Section 1.150-1(c)(3)(i) of the Regulations for the purposes not listed under Section 1.150-1(c)(3)(ii) of the Regulations.

14. Covenants Regarding Arbitrage Rules. This certificate is being executed and delivered pursuant to the laws set forth in paragraph 1. On the basis of the foregoing, it is not expected that the proceeds of the Bonds will be used in a manner that would cause the Bonds to be arbitrage bonds under Section 148 of the Code and the Regulations. No action will be taken that would impair the status of the Bonds as Build America Bonds. In particular, and without limiting the foregoing, the proceeds of the Bonds shall not be used or invested in any manner that will cause the Bonds to be arbitrage bonds within the meaning of Section 148 of the Code. So long as any of the Bonds remain outstanding, no action shall be taken or authorized that will cause the Bonds to be classified as arbitrage bonds within the meaning of such Section 148 and the Regulations. No proceeds of the Bonds shall be invested at an unrestricted yield for a period of time or in an amount not allowable under the Code or the Regulations. The County acknowledges that the Combined Bond Yield may be used to measure compliance with the arbitrage provisions under Section 148 of the Code.

15. Covenants Regarding Use of Bond Proceeds and Maintenance of Direct Pay Build America Bond Status. In order to preserve the status of the Bonds as Build America Bonds under federal law and as an inducement to the purchasers of the Bonds, the County represents, covenants and agrees that:

(a) No actions will be taken by the County that would impair the status of the Bonds as Direct Pay Build America Bonds.

(b) All proceeds of the Bonds (except for up to \$252,700 which may be used for costs of issuance), plus investment earnings thereon, will be used, solely and exclusively, to pay capital expenditures for the Project.

(c) The Project will be available for use by members of the general public. Use by a member of the general public means use by natural persons not engaged in a trade or business. No person or entity, other than the County or another state or local government unit, will use more than 10% of the proceeds of the Bonds or the Project other than as a member of the general public. No person or entity other than the County or another state or local governmental unit will own property financed within the proceeds of the Bonds or will have actual or beneficial use of such property pursuant to a lease, a management or incentive payment contract, an arrangement such as a take-or-pay or output contract or any other type of arrangement that conveys other special legal entitlements and differentiates that person's or entity's use of such property from the use by the general public, unless such uses in the aggregate relate to no more than 10% of the proceeds of the Bonds. If the County enters into a management contract for any of the project financed with the Bonds, the terms of the contract will comply with IRS Revenue Procedure 97-13, as it may be amended, supplemented or superseded from time to time, so that the contract will not give rise to private business use under the Code and the Regulations, unless such use in aggregate relates to no more than 10% of the proceeds of the Bonds.

(d) No more than 10% of the payment of the principal of or interest on the Bonds will be (under the terms of the Bonds, the Ordinance or any underlying arrangement), directly or indirectly, (i) secured by any interest in property used or to be used for a private business use or payments in respect of such property or (ii) derived from payments (whether or not to the

County) in respect of such property or borrowed money used or to be used for a private business use.

(e) No more than 5% of the Bond proceeds will be loaned to any entity or person other than a state or local governmental unit. No more than 5% of the Bond proceeds will be transferred, directly or indirectly, or deemed transferred to a nongovernmental person in any manner that would in substance constitute a loan of the Bond proceeds.

(f) The County reasonably expects, as of the date hereof, that it will comply with the covenants described in paragraphs (c), (d) and (e) above during the entire term of the Bonds.

(g) No more than 5% of the proceeds of the Bonds will be attributable to private business use as described in (c) and private security or payments described in (d) attributable to unrelated or disproportionate private business use. For this purpose, the private business use test is applied by taking into account only use that is not related to any government use of proceeds of the issue (Unrelated Use) and use that is related but disproportionate to any governmental use of those proceeds (Disproportionate Use).

(h) The County covenants and agrees not to enter into any contracts or arrangements which would cause the Bonds to be treated as private activity bonds under Section 141 of the Code.

(i) To the extent necessary and in connection with the delivery to the County of an opinion of nationally recognized bond counsel, the County covenants to make any necessary reallocation of the use of proceeds of the Bonds for capital expenditures as permitted under Section 1.148-6(d)(1) of the Regulations in order to preserve the status of the Bonds as Direct Pay Build America Bonds.

16. Hedge Bonds. No more than 50% of the Sale Proceeds of the Bonds will be invested in "nonpurpose investments" as defined in Section 148(f)(6)(A) of the Code having a substantially guaranteed yield for four years or more. As shown in Paragraph 5, at least 85% of the Sale Proceeds are reasonably expected to be spent within three years of the issue date of the Bonds.

17. Federal Guarantees. The Bonds are not federally guaranteed as described in Section 149(b) of the Code.

18. Information Return. The County will file or cause to be filed on or before November 15, 2010, the Information Return for Build America Bonds and Recovery Zone Economic Development Bonds on Form 8038-B with the Internal Revenue Service Center, Ogden, Utah, 84201, for the issuance of the Bonds. The County has elected, pursuant to Section 54AA(g) of the Code, to receive a credit equal to thirty-five percent (35%) of the stated interest payable on each interest payment date from the United States Treasury pursuant to Section 6431 of the Code (the "Credit"). To obtain the Credit, the County shall complete and file a form requesting the Credit ("Form 8038-CP") on a date which is not more than ninety (90) nor less than forty-five (45) days preceding each interest payment date, with the Department of the Treasury. The Form 8038-CP will specify that the County is the entity entitled to receive payment of the Credit and the County intends to engage an independent party to prepare and file each Form 8038-CP relating to the Bonds. The County has reviewed the provisions of Form 8038-B incorporated in the transcript for the Bonds and hereby certifies and covenants that the information in that form is and will be correct.

19. Registered Bonds. The Bonds will be issued in registered form as described in Section 149(a) of the Code.

20. Rebate and Yield Restriction Requirement. The County will make rebate payments or any necessary yield reduction payments (or actually restrict the yield on investments that are yield restricted and do not qualify for yield reduction payments under the Regulations) to the United States Government to assure that the Bonds will not be "arbitrage bonds" under Section 148 of the Code. The County reasonably expects and hereby represents that at least 75% of the Available Construction Proceeds (as hereinafter defined) of the Combined Bonds will be used for construction expenditures with respect to a facility owned by the County and acknowledges that the County may qualify for the exception to the rebate requirement in Section 148(f)(4)(C) by spending the Available Construction Proceeds of the Combined Bonds for the governmental purpose as follows:

<u>Minimum Spent</u>	<u>Date</u>
10%	March 28, 2011
45%	September 28, 2011
75%	March 28, 2012
100%	September 28, 2012 (except for a de minimus amount not exceeding \$250,000)

except that on September 28, 2012, a reasonable retainage in an amount not to exceed 5% of the Available Construction Proceeds of the Combined Bonds may remain, which retainage must be spent on or before September 28, 2013. For purposes of determining whether the foregoing expenditure requirements have been met on each of the first three computation dates, the County shall include the total amount of reasonably expected earnings in the amount of Available Construction Proceeds of the Combined Bonds through the first three computation dates and shall include the actual earnings in the amount of Available Construction Proceeds for the final period. "Available Construction Proceeds of the Combined Bonds" means an amount equal to (i) Sale Proceeds of each issue plus (ii) investment earnings on the Sale Proceeds of each issue and

(iii) earnings on the amounts in clause (ii) for each issue reduced by (iv) the amount of Sale Proceeds (and investment earnings thereon) expended for costs of issuance for each issue. In reliance on the advice of its financial advisor, the County hereby elects that, if it fails to spend all of the Available Construction Proceeds in accordance with this schedule, it shall cause to be calculated and paid, as necessary, any rebate obligation which may be owed on the proceeds of the Combined Bonds. For purposes of the payment of any rebate obligation, the County hereby selects that the bond years for the Combined Bonds shall end on each anniversary of the issue date of the Bonds. The County certifies and agrees that it will calculate or have calculated, the above-referenced spend-down calculation and, if necessary, hire nationally recognized bond counsel or a qualified accounting firm to calculate any rebate or yield restriction liability owed.

21. Change in Law. It is not an event of default under the Ordinance if the designation of the Bonds as Direct Build America Bonds is affected by any provision of the Code which is not currently in effect and in existence on the date of the issuance of the Bonds.

22. Direct Pay Build America Bonds. The County has designated the Bonds as Build America Bonds pursuant to Section 54AA of the Code. The Bonds satisfy the following requirements: (i) the interest on the Bonds would be, but for Section 54AA of the Code, excludable from gross income under Section 103 of the Code, (ii) the Bonds meet the 2% limit on costs of issuance, (iii) the Bonds are issued before January 1, 2011, (iv) the County has made an irrevocable election to have Section 54AA(d) and (g) of the Code apply to the obligation (including investment earnings thereon) less Sale Proceeds used to pay costs of issuance, (v) the Bonds are not private activity bonds under Section 141 of the Code, (vi) 100% of the Sale Proceeds of the Bonds (including investment proceeds) less Sale Proceeds used to pay costs of issuance will be used, solely and exclusively, for capital expenditures, (vii) the issue price of

each maturity of the Bonds does not have more than a *de minimis* amount of premium over the stated principal amount of each maturity, as determined under rules similar to the rules of Section 1273(a)(3) of the Code governing original issue discount and (viii) the County reasonably hereby establishes written procedures in a form reasonably similar to the form attached hereto as Exhibit D to ensure (a) timely identification of violations of Federal tax requirements after the issuance of the Bonds and (b) timely correction of any identified violations through remedial actions taken under Section 1.141-12 of the Regulations or other applicable remedial actions taken under any additional remedial actions authorized by the Commissioner of the Internal Revenue Service under Section 1.141-12(h) of the Regulations. The County separately has elected to treat the Bonds as a direct pay bond under Section 54AA(g) of the Code.

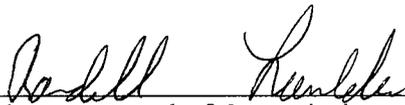
We have discussed this Certificate and the provisions of the Code and the applicable Regulations with such professionals as we have deemed necessary. We have been given an opportunity to ask questions of Ice Miller LLP with respect to the certifications contained above and the information needed to complete such certifications and have discussed such certifications with Ice Miller LLP. Based on all of these discussions we are satisfied: (a) that we understand the certifications which we have made in this Certificate, and (b) that to the best of our knowledge, information and belief, all of the certifications contained herein are true, complete and accurate.

To the best of our knowledge, information, and belief, the above expectations are reasonable and there are no other facts, estimates or circumstances that would materially change any of the foregoing certifications or conclusions. We understand that this certificate will be relied upon by the purchasers of the Bonds and by Ice Miller LLP in rendering its opinions as to

various legal issues. We further understand that the facts contained in this certificate will be used by the financial advisor to prepare or review the offering materials and disclosure documents to be distributed in connection with the sale of the Bonds. The representations contained in this Certificate may be relied upon by Ice Miller LLP and others in determining whether or not the Bonds constitute arbitrage bonds within the meaning of Section 148 of the Code.

IN WITNESS WHEREOF, we have hereunto set our hands this 29th day of September, 2010.

**COUNTY OF UNION, ILLINOIS**

By:   
Its: Chairman, Board of Commissioners

By:   
Its: County Clerk

By:   
Its: County Treasurer

(Signature Page to Certificate Re: Arbitrage and Federal Tax Matters)

**EXHIBIT A**

**SOURCES AND USES OF FUNDS**

Sources of Funds:		
Principal Amount of Bonds		\$12,635,000.00
Total Sources		\$12,635,000.00
Uses of Funds:		
Deposit to Project Fund		\$11,457,274.67
Underwriter's Discount		202,160.00
Capitalized Interest		925,025.33
Costs of Issuance		<u>50,540.00</u>
Total Uses		\$12,635,000.00

**EXHIBIT B**

**ESTIMATED DRAW SCHEDULE FOR PROJECT FUND  
AND CAPITALIZED INTEREST FUND**

<u>Date</u>	<u>Project Fund</u>	<u>Capitalized Interest Fund</u>
08/10	\$ 17,795	
09/10	104,000	
10/10	53,400	
10/10	64,560	
11/10	129,120	
12/10	128,620	
01/11	117,500	
02/11	122,080	
03/11	856,645	
04/11	549,500	
05/11	549,500	
06/11	549,000	
07/11	547,500	
08/11	547,500	
09/11	547,500	\$760,169
10/11	545,750	
11/11	547,500	
12/11	547,500	
01/12	545,750	
02/12	547,500	
03/12	547,500	
04/12	545,750	
05/12	547,500	
06/12	547,500	
07/12	545,750	
08/12	547,500	
09/12	<u>572,680</u>	<u>165,000</u>
Total	\$11,472,400	\$925,169

## EXHIBIT C

### PURCHASER CERTIFICATE

On the 29th day of September, the undersigned received from the County of Union, Illinois (the "County"), the \$12,635,000 Taxable General Obligation Bonds (Alternate Revenue Source), Series 2010B (Build American Bonds (Direct Payment)) (the "Bonds").

The undersigned, as representative of the purchaser of the Bonds (the "Purchaser"), hereby certifies that:

1. As Purchaser, we have entered into a Bond Purchase Agreement with the County on September 20, 2010 (the "Sale Date") which has not been amended after such date.

2. We hereby confirm that the initial offering price at which each maturity of the Bonds were offered to the public (excluding bond houses, brokers or similar persons or organizations acting in the capacity of underwriters or wholesalers) on the Sale Date was equal to the initial offering price shown for each maturity on Schedule 1 attached hereto. All the Bonds have been the subject of a bona fide initial offering to the public (excluding bond houses, brokers or similar persons or organizations acting in the capacity of underwriters or wholesalers) at prices no higher than that shown on Schedule 1 attached hereto. The initial offering price for each maturity of the Bonds is not less than the fair market value price of each such maturity of the Bonds as of the Sale Date. We hereby confirm that the first price at which at least 10% of each maturity of the Bonds has been sold to the public (excluding bond houses, brokers or similar persons or organization acting in the capacity of underwriters or wholesalers) was at or below the respective initial offering prices shown for each maturity of the Bonds on Schedule 1 attached hereto.

3. The calculation attached as Schedule 2 demonstrates that the yield on the Bonds is 4.42017% and the yield on the Combined Bonds (as defined in the Certificate of the County Re: Arbitrage and Federal Tax Matters) is 4.38764 %. Such calculations treat the aggregate of the initial offering prices multiplied by the respective par amount of each maturity described above as the "issue price" of the Bonds and Combined Bonds, respectively, taking into account as a reduction to the yield the direct payments from the United States Treasury to the County with respect to the Bonds and the Combined Bonds, respectively, as if such payments were made contemporaneously with each interest payment date under the Bonds and the Combined Bonds, respectively, in accordance with Section 6431(b) of the Internal Revenue Code of 1986, as amended (the "Code").

4. We have been asked by Ice Miller LLP, bond counsel, to calculate the weighted average maturity of the Bonds in the following manner: divide (a) the sum of the products determined by taking the initial offering price of each maturity of the Bonds times the number of years from the date hereof to the date of such maturity, by (b) the "issue price" of the Bonds as described above. Based on this calculation, the weighted average maturity of the Bonds is 20.253 years.

Nothing herein represents the interpretation by the undersigned of any laws, and in particular, regulations under Section 148 of the Code.

Dated this 29th day of September, 2010.

**BERNARDI SECURITIES, INC., as Purchaser**

By: *Kay Kumbati*  
Its: *SA VP.*

**SCHEDULE 1**

Designation: County of Union, Illinois, Taxable General Obligation Bonds (Alternate Revenue Source), Series 2010B (Build American Bonds (Direct Payment))

Total issue: \$12,635,000

Originally Dated: September 29, 2010

Denomination: \$5,000 each or integral multiples thereof

Interest Payment Dates: Payable semiannually on each March 1 and September 1 of each year, beginning on September 1, 2011

Maturities and Interest Rates: Maturing on September 1 in the years and amounts and bearing interest at the rates as follows:

<u>Year</u>	<u>Amount(\$)</u>	<u>Interest Rate(%)</u>	<u>Reoffering Price (%)</u>
2015	\$280,000	3.400%	100.00
2016	285,000	3.700%	100.00
2017	295,000	4.300%	100.00
2018	300,000	4.550%	100.00
2019	310,000	4.800%	100.00
2020	320,000	5.000%	100.00
2021	330,000	5.200%	100.00
2022	345,000	5.400%	100.00
2023	355,000	5.600%	100.00
2024	370,000	5.800%	100.00
2025	390,000	6.000%	100.00
2026	400,000	6.200%	100.00
2030	1,805,000	6.900%	100.00
2040	6,350,000	7.250%	100.00
2041	500,000	7.350%	100.00

The Bonds maturing on September 1, 2030 are subject to mandatory redemption on September 1 of the years and in the principal amounts as follows:

YEAR	PRINCIPAL AMOUNT
2027	\$420,000
2028	440,000
2029	460,000
2030	485,000

The Bonds due on September 1, 2040 are subject to mandatory redemption on September 1 of the years and in the principal amounts as follows:

YEAR	PRINCIPAL AMOUNT
2031	\$505,000
2032	530,000
2033	555,000
2034	585,000
2035	610,000
2036	645,000
2037	675,000
2038	710,000
2039	745,000
2040	790,000

## **SCHEDULE 2**

See Attached Bond Yield Calculation and Combined Bond Yield Calculation.

Preliminary

## Union County, Illinois

\$12,635,000 Taxable General Obligation Bonds (ARS), Series 2010B

(Build America Bonds (Direct Payment))

AAA Insured

### Proof Of Bond Yield @ 4.4201796%

Part 1 of 2

Date	Cashflow	PV Factor	Present Value	Cumulative PV
09/29/2010	-	1.0000000x	-	-
09/01/2011	494,110.07	0.9604821x	474,583.87	474,583.87
03/01/2012	267,891.00	0.9397136x	251,740.81	726,324.68
09/01/2012	267,891.00	0.9193941x	246,297.41	972,622.09
03/01/2013	267,891.00	0.8995141x	240,971.72	1,213,593.82
09/01/2013	267,891.00	0.8800639x	235,761.19	1,449,355.00
03/01/2014	267,891.00	0.8610342x	230,663.32	1,680,018.33
09/01/2014	267,891.00	0.8424161x	225,675.69	1,905,694.01
03/01/2015	267,891.00	0.8242005x	220,795.90	2,126,489.91
09/01/2015	547,891.00	0.8063788x	441,807.70	2,568,297.61
03/01/2016	264,797.00	0.7889425x	208,909.60	2,777,207.21
09/01/2016	549,797.00	0.7718832x	424,379.05	3,201,586.26
03/01/2017	261,369.88	0.7551927x	197,384.63	3,398,970.89
09/01/2017	556,369.88	0.7388632x	411,081.22	3,810,052.12
03/01/2018	257,247.25	0.7228867x	185,960.63	3,996,012.74
09/01/2018	557,247.25	0.7072558x	394,116.33	4,390,129.07
03/01/2019	252,811.00	0.6919628x	174,935.80	4,565,064.87
09/01/2019	562,811.00	0.6770004x	381,023.29	4,946,088.16
03/01/2020	247,975.00	0.6623617x	164,249.13	5,110,337.29
09/01/2020	567,975.00	0.6480394x	368,070.18	5,478,407.47
03/01/2021	242,775.00	0.6340268x	153,925.87	5,632,333.34
09/01/2021	572,775.00	0.6203173x	355,302.22	5,987,635.56
03/01/2022	237,198.00	0.6069041x	143,956.45	6,131,592.01
09/01/2022	582,198.00	0.5937810x	345,698.14	6,477,290.15
03/01/2023	231,143.25	0.5809417x	134,280.76	6,611,570.90
09/01/2023	586,143.25	0.5683800x	333,152.10	6,944,723.01
03/01/2024	224,682.25	0.5560899x	124,943.53	7,069,666.54
09/01/2024	594,682.25	0.5440656x	323,546.14	7,393,212.68
03/01/2025	217,707.75	0.5323012x	115,886.11	7,509,098.79
09/01/2025	607,707.75	0.5207913x	316,488.90	7,825,587.69
03/01/2026	210,102.75	0.5095302x	107,053.70	7,932,641.39
09/01/2026	610,102.75	0.4985126x	304,143.93	8,236,785.32
03/01/2027	202,042.75	0.4877333x	98,542.98	8,335,328.30
09/01/2027	622,042.75	0.4771870x	296,830.73	8,632,159.03
03/01/2028	192,624.25	0.4668688x	89,930.25	8,722,089.29
09/01/2028	632,624.25	0.4567737x	288,966.12	9,011,055.41
03/01/2029	182,757.25	0.4468969x	81,673.64	9,092,729.06
09/01/2029	642,757.25	0.4372336x	281,035.08	9,373,764.14
03/01/2030	172,441.75	0.4277793x	73,767.01	9,447,531.15
09/01/2030	657,441.75	0.4185294x	275,158.73	9,722,689.88
03/01/2031	161,565.63	0.4094796x	66,157.83	9,788,847.71
09/01/2031	666,565.63	0.4006254x	267,043.12	10,055,890.82
03/01/2032	149,666.57	0.3919627x	58,663.71	10,114,554.53

Preliminary

**Union County, Illinois**

\$12,635,000 Taxable General Obligation Bonds (ARS), Series 2010B

(Build America Bonds (Direct Payment))

AAA Insured

**Proof Of Bond Yield @ 4.4201796%**

Part 2 of 2

Date	Cashflow	PV Factor	Present Value	Cumulative PV
09/01/2032	679,666.57	0.3834873x	260,643.47	10,375,198.00
03/01/2033	137,178.44	0.3751951x	51,468.68	10,426,666.68
09/01/2033	692,178.44	0.3670823x	254,086.42	10,680,753.10
03/01/2034	124,101.25	0.3591448x	44,570.32	10,725,323.43
09/01/2034	709,101.25	0.3513790x	249,163.32	10,974,486.74
03/01/2035	110,317.19	0.3437812x	37,924.97	11,012,411.72
09/01/2035	720,317.19	0.3363476x	242,276.95	11,254,688.67
03/01/2036	95,944.07	0.3290747x	31,572.77	11,286,261.44
09/01/2036	740,944.07	0.3219592x	238,553.72	11,524,815.16
03/01/2037	80,746.25	0.3149974x	25,434.86	11,550,250.02
09/01/2037	755,746.25	0.3081862x	232,910.59	11,783,160.61
03/01/2038	64,841.57	0.3015223x	19,551.18	11,802,711.79
09/01/2038	774,841.57	0.2950025x	228,580.20	12,031,291.99
03/01/2039	48,112.19	0.2886237x	13,886.32	12,045,178.31
09/01/2039	793,112.19	0.2823827x	223,961.20	12,269,139.51
03/01/2040	30,558.13	0.2762768x	8,442.50	12,277,582.01
09/01/2040	820,558.13	0.2703028x	221,799.20	12,499,381.20
03/01/2041	11,943.75	0.2644581x	3,158.62	12,502,539.83
09/01/2041	511,943.75	0.2587397x	132,460.17	12,635,000.00
<b>Total</b>	<b>\$24,097,538.41</b>	<b>-</b>	<b>\$12,635,000.00</b>	<b>-</b>

**Derivation Of Target Amount**

Par Amount of Bonds	\$12,635,000.00
Original Issue Proceeds	\$12,635,000.00

Preliminary

**Union County, Illinois**

Series 2010A & 2010B Arbitrage Yield Summary

**Yield Calculations**

Part 1 of 2

Date	Debt Service	Arbitrage Yield '4.387640%	True Interest Cost '4.509710%	All-in Bond Yield '4.540678%	Net Debt Service	Effective All-in Yield '4.540678%
9/29/2010	-	-	-	-	-	-
9/1/2011	534,543.29	513,570.03	513,004.76	512,861.51	(225,626.04)	(216,474.35)
3/1/2012	289,812.63	272,464.21	272,001.87	271,884.74	124,956.63	117,226.78
9/1/2012	289,812.63	266,615.15	266,003.86	265,849.07	289,812.63	265,849.07
3/1/2013	289,812.63	260,891.66	260,138.13	259,947.38	289,812.63	259,947.38
9/1/2013	289,812.63	255,291.03	254,401.74	254,176.71	289,812.63	254,176.71
3/1/2014	289,812.63	249,810.64	248,791.84	248,534.14	289,812.63	248,534.14
9/1/2014	289,812.63	244,447.89	243,305.65	243,016.84	289,812.63	243,016.84
3/1/2015	289,812.63	239,200.27	237,940.44	237,622.01	289,812.63	237,622.01
9/1/2015	569,812.63	460,205.49	457,508.41	456,826.97	569,812.63	456,826.97
3/1/2016	286,718.63	226,595.35	225,132.91	224,763.55	286,718.63	224,763.55
9/1/2016	571,718.63	442,132.86	439,017.14	438,230.51	571,718.63	438,230.51
3/1/2017	283,291.51	214,377.59	212,739.80	212,326.47	283,291.51	212,326.47
9/1/2017	578,291.51	428,221.04	424,695.90	423,806.58	578,291.51	423,806.58
3/1/2018	279,168.88	202,284.94	200,499.97	200,049.83	279,168.88	200,049.83
9/1/2018	579,168.88	410,655.02	406,788.44	405,813.70	579,168.88	405,813.70
3/1/2019	274,732.63	190,615.20	188,707.73	188,227.05	274,732.63	188,227.05
9/1/2019	584,732.63	396,990.38	392,783.14	391,723.32	584,732.63	391,723.32
3/1/2020	269,896.63	179,306.27	177,300.12	176,794.95	269,896.63	176,794.95
9/1/2020	589,896.63	383,485.81	378,968.87	377,831.90	589,896.63	377,831.90
3/1/2021	264,696.63	168,382.58	166,299.94	165,775.91	264,696.63	165,775.91
9/1/2021	594,696.63	370,185.66	365,388.80	364,182.26	594,696.63	364,182.26
3/1/2022	259,119.63	157,833.72	155,695.52	155,157.91	259,119.63	155,157.91
9/1/2022	604,119.63	360,079.00	354,988.94	353,709.62	604,119.63	353,709.62
3/1/2023	253,064.88	147,598.55	145,425.25	144,879.22	253,064.88	144,879.22
9/1/2023	608,064.88	347,036.78	341,722.77	340,388.16	608,064.88	340,388.16
3/1/2024	246,603.88	137,721.22	135,531.41	134,981.65	246,603.88	134,981.65
9/1/2024	616,603.88	336,963.28	331,407.53	330,013.26	616,603.88	330,013.26
3/1/2025	239,629.38	128,142.07	125,954.08	125,405.19	239,629.38	125,405.19
9/1/2025	629,629.38	329,467.09	323,648.23	322,189.02	629,629.38	322,189.02
3/1/2026	232,024.38	118,805.36	116,637.43	116,093.97	232,024.38	116,093.97
9/1/2026	632,024.38	316,673.42	310,709.26	309,214.74	632,024.38	309,214.74
3/1/2027	223,964.38	109,807.52	107,675.12	107,140.98	223,964.38	107,140.98
9/1/2027	643,964.38	308,951.54	302,771.04	301,223.47	643,964.38	301,223.47
3/1/2028	214,545.88	100,721.94	98,648.10	98,129.02	214,545.88	98,129.02
9/1/2028	654,545.88	300,690.25	294,323.34	292,730.29	654,545.88	292,730.29
3/1/2029	204,678.88	92,008.44	90,006.47	89,505.74	204,678.88	89,505.74
9/1/2029	664,678.88	292,376.10	285,843.70	284,210.46	664,678.88	284,210.46
3/1/2030	194,363.38	83,660.37	81,742.37	81,263.01	194,363.38	81,263.01
9/1/2030	679,363.38	286,142.82	279,415.82	277,735.20	679,363.38	277,735.20
3/1/2031	183,487.26	75,624.41	73,802.46	73,347.45	183,487.26	73,347.45

Preliminary

**Union County, Illinois**

Series 2010A & 2010B Arbitrage Yield Summary

**Yield Calculations**

Part 2 of 2

Date	Debt Service	Arbitrage Yield '4.387640%	True Interest Cost '4.509710%	All-in Bond Yield '4.540678%	Net Debt Service	Effective All-in Yield '4.540678%
9/1/2031	688,487.26	277,668.98	270,817.61	269,107.19	688,487.26	269,107.19
3/1/2032	171,588.20	67,716.46	66,006.16	65,579.35	171,588.20	65,579.35
9/1/2032	701,588.20	270,934.59	263,934.03	262,187.68	701,588.20	262,187.68
3/1/2033	159,100.07	60,121.24	58,532.83	58,136.74	159,100.07	58,136.74
9/1/2033	714,100.07	264,053.54	256,923.78	255,146.54	714,100.07	255,146.54
3/1/2034	146,022.88	52,835.91	51,378.59	51,015.46	146,022.88	51,015.46
9/1/2034	731,022.88	258,830.00	251,540.74	249,725.10	731,022.88	249,725.10
3/1/2035	132,238.82	45,816.09	44,499.22	44,171.33	132,238.82	44,171.33
9/1/2035	742,238.82	251,639.06	244,260.45	242,423.93	742,238.82	242,423.93
3/1/2036	117,865.70	39,101.84	37,932.63	37,641.73	117,865.70	37,641.73
9/1/2036	762,865.70	247,647.08	240,098.64	238,221.27	762,865.70	238,221.27
3/1/2037	102,667.88	32,613.32	31,600.38	31,348.54	102,667.88	31,348.54
9/1/2037	777,667.88	241,729.70	234,081.93	232,181.28	777,667.88	232,181.28
3/1/2038	86,763.20	26,390.45	25,540.26	25,329.05	86,763.20	25,329.05
9/1/2038	796,763.20	237,146.02	229,369.21	227,437.94	796,763.20	227,437.94
3/1/2039	70,033.82	20,397.16	19,716.50	19,547.52	70,033.82	19,547.52
9/1/2039	815,033.82	232,280.60	224,395.22	222,438.47	815,033.82	222,438.47
3/1/2040	52,479.76	14,635.40	14,130.12	14,004.78	52,479.76	14,004.78
9/1/2040	842,479.76	229,904.53	221,834.75	219,833.74	842,479.76	219,833.74
3/1/2041	33,865.38	9,043.14	8,720.51	8,640.54	33,865.38	8,640.54
9/1/2041	748,865.38	195,678.24	188,584.49	186,826.83	748,865.38	186,826.83
3/1/2042	17,516.82	4,478.88	4,313.93	4,273.08	17,516.82	4,273.08
9/1/2042	872,516.82	218,304.82	210,139.72	208,118.12	872,516.82	208,118.12
<b>Total:</b>	<b>26,558,303.07</b>	<b>13,705,000.00</b>	<b>13,485,720.00</b>	<b>13,430,900.00</b>	<b>25,633,277.74</b>	<b>12,546,906.17</b>
	-	-	-	-	-	-
	-	-	-	-	-	-
Bonds	-	13,705,000.00	13,705,000.00	13,705,000.00	-	13,705,000.00
Accrued Interest	-	-	-	-	-	-
Reoffering Premium	-	-	-	-	-	-
Bond Insurance	-	-	-	-	-	-
Underwriter's Discount	-	-	(219,280.00)	(219,280.00)	-	(219,280.00)
Costs of Issuance	-	-	-	(54,820.00)	-	(54,820.00)
	-	-	-	-	-	-
Target Price for Yield	-	13,705,000.00	13,485,720.00	13,430,900.00	-	13,430,900.00
	-	-	-	-	-	-

## EXHIBIT D

### TAX COMPLIANCE PROCEDURES

\_\_\_\_\_, 2010

The following procedures (the "Procedures") are adopted by the County of Union, Illinois (the "Issuer") to ensure that any obligations issued by the Issuer, the interest on which is excludable from gross income under Section 103(a) of the Internal Revenue Code of 1986, as amended (the "Code"), or which are "build America bonds" within the meaning of Section 54AA of the Code (any such obligations, "Bonds"), satisfy and will continue to satisfy all requirements of the Code and the regulations thereunder (the "Regulations").

The Procedures supplement, but do not replace, any other procedures of the Issuer. The Procedures may be supplemented or amended at any time and from time to time by the Issuer, with the advice of nationally recognized bond counsel, but without any notice to or consent from any trustee, any bondholder or any other person. Noncompliance with the Procedures is permitted, with the advice of nationally recognized bond counsel, but without any notice to or consent from any trustee, any bondholder or any other person, if (i) compliance would impose unreasonable burdens on the Issuer and (ii) noncompliance would not cause any Bonds to fail to satisfy all requirements of the Code and the Regulations.

#### **General**

1. The \_\_\_\_\_ of the Issuer (the "Compliance Officer") shall be primarily responsible for monitoring compliance with the Code and the Regulations.
2. The Compliance Officer may delegate any such responsibility to any officer, employee, attorney or agent of the Issuer, if, such officer's employee's, attorney's or agent's discharge of such responsibility is under the supervision of the Compliance Officer.
3. The Compliance Officer and any such officers, employees, attorneys or agents shall be provided training and educational resources necessary to ensure compliance with the Code and the Regulations.

#### **Issuance**

4. Upon issuance of any Bonds, the Compliance Officer shall obtain, review and retain a copy of any tax or arbitrage certificates or agreements of the Issuer with respect to the Bonds (the "Tax Certificate").
5. The Compliance Officer shall cause an Internal Revenue Service Information Return (*e.g.*, Form 8038-B) for any Bonds (an "Information Return") to be filed with the Internal Revenue Service not later than the 15th day of the second calendar month after the close of the calendar quarter in which the Bonds are issued.

## Post-Issuance

6. The Compliance Officer shall monitor the yield on the investment of Bond proceeds (including compliance with any yield restrictions or temporary periods).

7. The Compliance Officer shall monitor the timely expenditure of Bond proceeds.

8. The Compliance Officer shall monitor the proper use of Bond proceeds and any facilities financed thereby.

9. The Compliance Officer shall, on or before each anniversary of the date of issuance of any Bonds, determine whether the Issuer has paid all amounts required to be rebated to the United States under Section 148(f) of the Code and Section 1.148-3 of the Regulations.

10. The Compliance Officer shall, on or before each anniversary of the date of issuance of any Bonds, determine whether Issuer has made all yield reduction payments required to be made to the United States under Section 1.148-5(c) of the Regulations.

11. The Compliance Officer shall monitor the investment, expenditure and use of Bond proceeds, to ensure timely identification of any violations of federal tax requirements and timely correction of any identified violations through remedial actions described in Section 1.141-12 of the Regulations or through the Tax Exempt Bonds Voluntary Closing Agreement Program described in Notice 2008-31.

12. The Compliance Officer shall monitor use of Bond proceeds, and any facilities financed thereby, to ensure that not more than 5% of Bond proceeds, or any facilities financed thereby, are:

(a) owned by any nongovernmental person;

(b) leased to any nongovernmental person;

(c) subjected to any management, service or incentive payment contract with any nongovernmental person, under which such nongovernmental person provides services involving all, any portion or any function of such facilities, unless such contract satisfies the conditions under which it would not result in private business use set forth in Revenue Procedure 97-13 (1997-1 C.B. 623), as amended from time to time;

(d) subjected to any agreement by any nongovernmental person to sponsor research, unless such agreement satisfies the conditions under which it would not result in private business use set forth in Revenue Procedure 2007-47 (2007-29 I.R.B. 108), as amended from time to time; or

(e) subjected to any other arrangement that conveys special legal entitlements for beneficial use thereof that are comparable to special legal entitlements described in subparagraph (a), (b), (c) or (d) above.

### **Build America Bonds (Direct Pay)**

13. To ensure that none of the maturities of any Bonds are issued with not more than a *de minimis* amount of premium (as required by Section 54AA(d)(2)(C) of the Code), the Compliance Officer shall:

- Obtain and review an issue price certificate from the underwriter
- Review records of secondary market trading activity for the Bonds available through the Municipal Securities Rulemaking Board's Electronic Municipal Market Access System after the sale date of the Bonds but before the Bonds are delivered on the date of issue

14. The Compliance Officer shall confirm that the "available project proceeds" (as defined in Section 54A(e)(4) of the Code) were correctly calculated.

15. The Compliance Officer shall monitor the use of Bond proceeds to ensure that 100% of such available project proceeds (less proceeds in any reasonably required reserve fund and proceeds used for costs of issuance not in excess of 2% as described in 16. below) are used only for capital expenditures.

16. The Compliance Officer shall monitor the use of Bond proceeds to ensure that costs of issuance financed by the Bonds do not exceed 2% of the proceeds of sale.

17. The Compliance Officer shall confirm that the amount of interest payable on each interest payment date is properly determined.

18. The Compliance Officer shall confirm that the amount of each refundable credit reported on Form 8038-CP is proper.

19. The Compliance Officer shall confirm that each Form 8038-CP is timely filed.

20. The Compliance Officer shall confirm that the payment of each refundable credit is made to the proper person.

### **Record Retention**

21. The following documents shall be maintained, on paper or by electronic means (*e.g.*, CD, disks, tapes), for the life of any Bonds, plus 3 years:

- Tax Certificate
- Information Return
- Audited Financial statements
- Bond transcripts, official statements and other offering documents

- Minutes and resolutions authorizing the issuance of the Bonds
- Certifications of the issue price of the Bonds
- Any formal elections for the Bonds (*e.g.*, election to employ an accounting methodology other than specific tracing)
- Appraisals, demand surveys or feasibility studies for Bond-financed property, if any
- Documents related to government grants associated with construction, renovation or purchase of Bond-financed facilities, if any
- Trustee statements for the Bonds, if any
- Reports of any IRS examinations of the Issuer or the Bonds
- Documentation of allocations of investments and investment earnings to the Bonds
- Documentation for investments of the Bond proceeds related to;
  - Investment contracts (*e.g.*, guaranteed investment contracts)
  - Credit enhancement transactions (*e.g.*, bond insurance contracts)
  - Financial derivatives (swaps, caps, etc)
  - Bidding of financial products
- The following arbitrage-related documents for the Bonds:
  - Computations of Bond yield
  - Computation of rebate and yield reduction payments
  - Form 8038-T, Arbitrage Rebate, Yield Reduction and Penalty in Lieu of Arbitrage Rebate
  - Form 8038-R, Request for Recovery of Overpayments Under Arbitrage Rebate Provisions
- Documentation of allocations of Bond proceeds to expenditures (*e.g.*, allocation of Bond proceeds to expenditures for the construction, renovation or purchase of facilities)
- Documentation of allocations of Bond proceeds to issuance costs
- Copies of requisitions, draw schedules, draw requests, invoices, bills and cancelled checks related to Bond proceeds spent during the construction period
- Copies of all contracts entered into for the construction, renovation or purchase of Bond-financed facilities

- Records of expenditure reimbursements incurred prior to issuing the Bonds for facilities financed with Bond proceeds
- A list or schedule of all Bond-financed facilities or equipment
- Documentation that tracks the purchase and sale of Bond-financed assets
- Records of trade or business activities by third parties allocated to Bond-financed facilities, if any
- Copies of the following agreements when entered into with respect to Bond-financed property:
  - Management and other service agreements
  - Research contracts
  - Naming rights contracts
  - Ownership documentation (*e.g.*, deeds, mortgages)
  - Leases
  - Subleases
  - Leasehold improvement contracts
  - Joint venture arrangements
  - Limited liability corporation arrangements
  - Partnership arrangements
  - Take contracts, take or pay contracts, or requirements contracts