

ELucas@robinsonbradshaw.com 704.377.8330 : Direct Phone 704.373.3930 : Direct Fax

## September 25, 2018

Re: Request for public hearing at Board of Commissioner's October 2, 2018 meeting to approve tax-exempt bond financing for Trinity Episcopal School

Ladies and Gentlemen:

On behalf of Trinity Episcopal School (the "School"), I am writing to request that the Board of Commissioners of Mecklenburg County (the "Board") hold a public hearing at its October 2, 2018 meeting and approve, in accordance with Section 147(f) of the Internal Revenue Code of 1986, as amended (the "Code"), the School's financing of a facility with the proposed issuance of tax-exempt bonds (the "Bonds").

As a requirement for tax exemption, that section of the Code requires all private activity bonds, such as the Bonds, to be approved by (1) the governmental unit issuing the bonds (in this case, Public Finance Authority, a body corporate and politic of the State of Wisconsin) and (2) each governmental unit having jurisdiction over the area in which the facilities being financed or refinanced are located (in this case, Mecklenburg County).

These requested actions by the Board do not in any way make Mecklenburg County responsible or liable for the Bonds, which is a fact that is set forth clearly in the resolution of the Board approving the financing, which we have previously provided to you.

Robinson, Bradshaw & Hinson, P.A., bond counsel for the transaction, caused the required notice of public hearing to be published in the *Charlotte Observer* at least 14 days before the public hearing. A copy of that notice has previously been provided to you.

As described in the notice, the principal amount of the Bonds will not exceed \$2,500,000 and will be used to finance the facility described in the notice of public hearing.

Please contact me if you have questions or need anything further.

Thank you for your consideration of this matter.

Sincerely,

ROBINSON, BRADSHAW & HINSON, P.A.

Edwin F. Lucas III

Ed Lucas