

RECEIVED

By City Clerk at 1:50 pm, Jan 22, 2024

(Notice date: January 22, 2024; 12:40 PM)

NOTICE OF PUBLIC HEARING

MASSACHUSETTS DEVELOPMENT FINANCE AGENCY

Telephonic Public Hearing at 10:00 a.m. January 30, 2024

Notice is hereby given that a telephonic public hearing will be conducted by the Massachusetts Development Finance Agency (“MassDevelopment”) at 10:00 a.m. January 30, 2024, with respect to the proposed amendment by MassDevelopment, acting under and pursuant to Massachusetts General Laws, Chapters 23G and 40D, as amended, of the terms of the Massachusetts Development Finance Agency Revenue Bonds, The Home for Little Wanderers Issue, Series 2011, in the aggregate original principal amount of \$18,000,000 (the “Bonds”).

Pursuant to IRS Revenue Procedure 2022-20, providing guidance for the holding of teleconference public hearings in conformance with the requirements of Section 147(f) of the Internal Revenue Code of 1986, as amended (the “Code”), the public hearing will be held via the following telephonic conference line:

Dial In: (888) 305-1655
Participant Code: 309-639

Said amendment of the terms of the Bonds will be deemed a current refunding of the Bonds under the Code. The Bonds, currently outstanding in the principal amount of \$7,800,000 constitute the maximum aggregate principal amount of the Bonds immediately following such amendment (\$7,800,000).

The proceeds of the Bonds were used to provide for the financing or refinancing of, or the reimbursement of funds advanced by The Home for Little Wanderers, Inc. (the “Borrower”), which term includes for the purposes of this Notice any parent, subsidiary or other affiliate thereof) with respect to the bonds previously issued by MassDevelopment with respect to facilities owned by the Borrower, including without limitation those facilities that are located at and adjacent to 399 Lincoln Road in Walpole, Massachusetts and 17 Greenville Avenue and 69 Alleghany Street, Boston, Massachusetts (including without limitation such financing, refinancing or reimbursement of bond reserves, interest and issuance costs), in particular, the proceeds of bonds, which were loaned to the Borrower for the purpose of:

(a) refinancing certain outstanding tax-exempt bonds (the “Prior Bonds”), (b) financing or refinancing (i) the construction, improvement and equipping of a two-story, approx. 43,000 sq. ft. school building to be used by the Borrower as an academic facility, (ii) the construction, improvement and equipping of two one-story dormitories of approx. 3,500 sq. ft. and approx. 6,000 sq. ft. and two one-story residential structures of approx. 2,600 sq. ft. each to be used by the Borrower for student housing, and (iii) the renovation of an existing one-story school building of approx. 14,500 sq. ft. that will continue to be used by the Borrower as an academic facility, all such facilities located on the Borrower's 161-acre property at 399 Lincoln Road in Walpole, Massachusetts, and (c) pay the costs of issuing the Bonds. The Prior Bonds were used to finance and refinance the acquisition, construction, renovation and equipping of certain academic, residential and administrative facilities

owned and used by the Borrower located at 17 Greenville Avenue and 69 Alleghany Street, Boston, Massachusetts.

The Bonds, as to be amended, will constitute qualified 501(c)(3) bonds for charitable purposes and will not constitute a general obligation of, or a pledge of the faith and credit of MassDevelopment or a general obligation of, or a debt or pledge of the faith and credit of The Commonwealth of Massachusetts.

Interested persons wishing to express their views on the proposed amendment of the Bonds will be given the opportunity to do so at the telephonic public hearing or may, prior to the time of the public hearing, submit their views in writing to the MassDevelopment at 99 High Street, 11th Floor, Boston, Massachusetts 02110. Persons desiring to participate at the telephonic public hearing must make a written request at least 24 hours prior to the hearing by email to tefrahearinginfo@MassDevelopment.com or by mail to MassDevelopment, 99 High Street, Boston, MA 02110, Attn: TEFRA Hearings.

MASSACHUSETTS DEVELOPMENT FINANCE AGENCY