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(Notice date: November 4, 2024; 8:45 a.m.)

NOTICE OF PUBLIC HEARING

MASSACHUSETTS DEVELOPMENT FINANCE AGENCY

Telephonic Public Hearing at 9:30 a.m. November 12, 2024

Notice is hereby given that a telephonic public hearing will be conducted by the Massachusetts Development Finance Agency (“MassDevelopment”) at 9:30 a.m. November 12, 2024, with respect to the proposed issuance by MassDevelopment, acting under and pursuant to Massachusetts General Laws, Chapters 23G and 40D, as amended, of bonds in the maximum aggregate principal amount of \$23,200,000 (the “Bonds”). The total estimated costs of the project are \$23,200,000.

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 toll-free telephonic conference line:

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

The Bonds will be issued 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, 17 Greenville Avenue, Boston, Massachusetts, 69 Alleghany Street, Boston, Massachusetts, 71-73 Alleghany Street, Boston, Massachusetts, 72 E. Dedham Street, Boston, Massachusetts, and 900 Ship Pond Road, Plymouth, 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) the current refunding of all or a portion of the outstanding principal amount of the Massachusetts Development Finance Agency Revenue Bonds, The Home for Little Wanderers Issue, Series 2011, issued as a tax-exempt bond issue in the original principal amount of \$18,000,000 (the “2011 Bonds”), dated September 8, 2011 (such 2011 Bonds being reissued for federal income tax purposes on February 27, 2014 and March 28, 2024), with the proceeds of the 2011 Bonds being loaned to the Borrower for the purpose of the:

(i) 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.

(b) the refinancing other conventional debt of the Borrower related to projects located at the following locations: 399 Lincoln Road in Walpole, Massachusetts, 17 Greenville Avenue, Boston, Massachusetts, 69 Alleghany Street, Boston, Massachusetts, 71-73 Alleghany Street, Boston, Massachusetts, 72 E. Dedham Street, Boston, Massachusetts, and 900 Ship Pond Road, Plymouth, Massachusetts.

and (c) financing certain capital improvements projects located at one or more of the following locations: 399 Lincoln Road in Walpole, Massachusetts, 17 Greenville Avenue, Boston, Massachusetts, 69 Alleghany Street, Boston, Massachusetts, 71-73 Alleghany Street, Boston, Massachusetts, 72 E. Dedham Street, Boston, Massachusetts, and 900 Ship Pond Road, Plymouth, Massachusetts.

The maximum aggregate principal amount of the Bonds for the project located at 399 Lincoln Road in Walpole, Massachusetts is \$11,481,059 (\$163,803 for capital improvements), the maximum aggregate principal amount of the Bonds for the project located at 17 Greenville Avenue in Boston, Massachusetts is \$134,536 (\$1,919 for capital improvements), the maximum aggregate principal amount of the Bonds for the project located at 69 Alleghany Street, in Boston, Massachusetts is \$145,537 (\$2,076 for capital improvements), the maximum aggregate principal amount of the Bonds for the project located at 71-73 Alleghany Street in Boston, Massachusetts is \$7,485,469 (\$106,797 for capital improvements), the maximum aggregate principal amount of the Bonds for the project located at 72 E. Dedham Street in Boston, Massachusetts is \$3,287,709 (\$46,907 for capital improvements), the maximum aggregate principal amount of the Bonds for the project located at 900 Ship Pond Road, Plymouth, Massachusetts is \$665,689 (\$9,498 for capital improvements) and the total estimated project costs are \$23,200,000.

The Bonds 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