

RESOLUTION 2022

A RESOLUTION to approve, for federal tax purposes, the issuance of bonds by the Community Fire Company of Millington, Maryland for the purpose of financing or refinancing a certain project more particularly described in this Resolution; and generally providing for and determining various matters in connection with such bonds.

RECITALS

1. The Mayor and Council of the Town of Millington has considered the request of the Community Fire Company of Millington, Maryland, a Maryland not-for-profit corporation to approve, for federal tax purposes, the issuance and/or incurrence by the Community Fire Company of Millington, Maryland of its tax exempt bonds, notes or other obligations in an aggregate principal amount not to exceed \$450,000.00 (collectively, the "Bonds") to finance the loan for the construction of improvements to the fire company property located at 185 Sassafras Street, Millington, MD 21651.

2. Section 150(e)(3) of the Internal Revenue Code of 1986, as amended (the "Code") treats any bonds issued by the VFD, the interest on which is intended to be exempt from federal income taxation, as private activity bonds requiring public approval in accordance with Section 147(f) of the Code. Section 147(f) of the Code requires, as a condition to qualifying the interest on private activity bonds for federal tax exemption, the approval of the governmental unit having jurisdiction over the issuer of the private activity bonds and over the area in which any facility or equipment financed with the proceeds of the private activity bonds will be located.

3. The Project will be located within the boundaries of the Town of Millington, Maryland and the Mayor and Council constitutes the elected legislative body of the Town of Millington.

4. The Project and the proposed issuance of the Bonds to finance the Project have been described to the Mayor and Council and the Mayor and Council has conducted a public hearing in connection therewith as required by Section 147(f) of the Code.

BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE TOWN OF MILLINGTON:

Section 1: The Mayor and Council does approve the issuance and/or incurrence of the Bonds by the Community Fire Company of Millington, Maryland in an aggregate principal amount not to exceed \$450,000.00 for the purpose of financing or refinancing the Project as required by Section 147(f) of the Code, and the applicable proposed, temporary and final regulations thereunder, to assist the Community Fire

Company of Millington, Maryland in financing the Project with the proceeds of tax-exempt obligations.

Section 2: The approval of the issuance of the Bonds does not constitute an endorsement to a prospective purchaser of the Bonds or the creditworthiness of the Community Fire Company of Millington, Maryland.

Section 3: The approval of the issuance of the Bonds in no way commits the Town of Millington to expend any funds on the Project or to pay the debt service on the Bonds and the Bonds will not constitute a debt or pledge of the faith and credit of the State of Maryland or any political subdivision thereof, including the Town of Millington and neither the faith nor credit nor taxing power of the State of Maryland or any political subdivision thereof, including the Town of Millington, will be pledged to the payment of the Bonds.

Section 4: The Commissioners make no representation as to the tax exempt status of the bonds.

Section 5: This Resolution takes effect from the date of its adoption.

Adopted this _____ day of _____, 2022.

WITNESS:

MAYOR AND COUNCIL OF THE TOWN
OF MILLINGTON, MARYLAND

ATTEST:

, Clerk