RESOLUTION 2015 - 15

A RESOLUTION to approve, for federal tax purposes, the issuance of bonds by the Newburg Volunteer Rescue Squad and Fire Department, Inc. 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 Board of County Commissioners of Charles County (the "Board") has considered the request of the Newburg Volunteer Rescue Squad and Fire Department, Inc., a Maryland not-for-profit corporation (the "VFD"), to approve, for federal tax purposes, the issuance and/or incurrence by the VFD of its tax-exempt bonds, notes or other obligations in an aggregate principal amount not to exceed $2,100,000.00 (collectively, the "Bonds") to finance or refinance the loan pertaining to the existing fire station located at 12245 Rock Point Road, Newburg, Maryland 20664 and same being described with more particularity in a Deed recorded in the Land Records of Charles County, Maryland at Liber 3537 Folio 117.

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 County Commissioners of Charles County (the "County") and the Board constitutes the elected legislative body of the County.

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

BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF CHARLES COUNTY:

Section 1: The Board does approve the issuance and/or incurrence of the Bonds by the VFD in an aggregate principal amount not to exceed $2,100,000.00 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 VFD 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 VFD.

Section 3: The approval of the issuance of the Bonds in no way commits the County 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 County, and neither the faith nor credit nor taxing power of the State of Maryland or any political subdivision thereof, including the County, will be pledged to the payment of the Bonds.

Section 4: The Commissioners make no representation as to the tax exempt status of the loan proceeds or the purpose for such use.

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

Adopted this 14th day of July, 2015.

Peter F. Murphy, President

Ken Robinson, Vice President

Debra M. Davis, Esquire

Amanda Stewart, M.Ed.

Bobby Rucci

ATTEST:

Danielle Mitchell, Clerk