PRELIMINARY OFFICIAL STATEMENT DATED JUNE 13, 2022

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NEW ISSUE SERIAL BONDS

In the opinion of Trespasz & Marquardt, LLP, Bond Counsel to the City, based upon an analysis of existing laws, regulations, rulings and court decisions, and assuming, among other matters, compliance by the City with certain covenants, interest on the Bonds excluded from gross income for Federal income tax purposes pursuant to Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and is not treated as a preference item in calculating the alternative minimum tax imposed under the Code with

RATINGS: See "RATINGS" herein

purposes pursuant to Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and is not treated as a preference item in calculating the alternative minimum tax imposed under the Code with respect to individuals. Bond Counsel is also of the opinion that interest on the Bonds is excluded from adjusted gross income for purposes of personal income taxes imposed by the State of New York and the City of New York. Bond Counsel expresses no opinion regarding any other tax consequences related to the ownership or disposition of, or the accrual of, interest on the Bonds. See "Tax Matters" herein.

The Bonds are not "Qualified Tax-Exempt Obligations" under Section 265(b) of the Code.



CITY OF SYRACUSE ONONDAGA COUNTY, NEW YORK

\$24,751,555* PUBLIC IMPROVEMENT BONDS, SERIES 2022A (the "Bonds")

Date of Issue: Date of Delivery Maturity Dates: May 15, 2024 – 2042

The Bonds are general obligations of the City of Syracuse, Onondaga County, New York (the "City"), and will contain a pledge of the faith and credit of the City for the payment of the principal of and interest on the Bonds. All the taxable real property within the City will be subject to the levy of ad valorem taxes to pay the Bonds and the interest thereon, subject to applicable statutory limitations. **See "Nature of Obligation" and "Tax Levy Limitation Law," herein.**

The Bonds will be issued in fully registered form, and when issued, will be registered in the name of Cede & Co., as nominee of The Depository Trust Company ("DTC"), New York, New York. DTC will act as securities depository for the Bonds. Individual purchases may be made in book-entry form only, in the principal amount of \$5,000 or integral multiples thereof. Purchasers will not receive certificates representing their ownership interest in the Bonds. Payment of the principal of and interest on the Bonds will be made by the City to DTC, which will in turn remit such principal and interest to its participants for subsequent disbursement to the beneficial owners of the Bonds as described herein. See "Book-Entry-Only System" herein.

The Bonds will be dated their Date of Delivery, will bear interest from such date payable May 15, 2023, November 15, 2023 and semiannually thereafter on May 15 and November 15 until maturity, and will mature on the dates in the years and amounts as set forth on the inside cover page hereof.

The Bonds will be subject to redemption prior to maturity (see "Optional Redemption" herein).

The Bonds are offered subject to the final approving opinions of Trespasz & Marquardt, LLP, Syracuse, New York, Bond Counsel, and certain other conditions. Capital Markets Advisors, LLC has served as Municipal Advisor to the City in connection with the issuance of the Bonds. It is expected that delivery of the Bonds in book-entry form through DTC on or about June 30, 2022.

THE OFFICIAL STATEMENT IS IN A FORM "DEEMED FINAL" BY THE CITY FOR PURPOSES OF THE SECURITIES AND EXCHANGE COMMISSION RULE 15C2-12 ("THE RULE"). THE CITY WILL COVENANT IN A DISCLOSURE UNDERTAKING TO PROVIDE NOTICE OF CERTAIN INFORMATION (AS DEFINED IN THE RULE) AS REQUIRED BY THE RULE (SEE "DISCLOSURE UNDERTAKING FOR THE BONDS" AND DISCLOSURE UNDERTAKING FOR THE NOTES," HEREIN).

Dated: June ____, 2022

^{*} Preliminary, subject to change.

\$24,751,555* PUBLIC IMPROVEMENT BONDS, SERIES 2022A

Dated Date: June 30, 2022 Principal Due: Interest Due:

May 15 as shown below. May 15 and November 15 of each year until maturity commencing May 15, 2023.

Year	Principal Amount	Interest Rate	Yield	CUSIP#
2024	\$ 2,641,555			871702
2025	3,155,000			871702
2026	3,405,000			871702
2027	3,415,000			871702
2028	1,030,000			871702
2029	1,060,000			871702
2030	1,095,000			871702
2031	1,125,000			871702
2032	1,120,000			871702
2033	965,000			871702
2034	985,000			871702
2035	1,010,000			871702
2036	1,035,000			871702
2037	950,000			871702
2038	350,000			871702
2039	355,000			871702
2040	365,000			871702
2041	370,000			871702
2042	320,000			871702

CITY OF SYRACUSE ONONDAGA COUNTY, NEW YORK

Ben Walsh MAYOR

COMMON COUNCIL

Helen Hudson President

Michael Greene	President Pro-Tempore and Councilor-at-Large
Rita Paniagua	Councilor-at-Large
	Councilor-at-Large
Amir Gethers	Councilor-at-Large
Jennifer Schultz	
Patrick Hogan	Councilor, Second District
Chol Majok	Councilor, Third District
Latoya Allen	
	City Auditor
Brad O'Connor, CPA	
Susan Katzoff	
Timothy Rudd	Director of Management and Budget

BOND COUNSEL

Trespasz & Marquardt, LLP Syracuse, New York

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC

Capital Markets Advisors, LLC Long Island * Southern Tier * Western New York (716) 662-3910 [THIS PAGE INTENTIONALLY LEFT BLANK]

No person has been authorized by the City of Syracuse to give any information or to make any representations not contained in this Official Statement and, if given or made, such other information or representations must not be relied upon as having been authorized. This Official Statement does not constitute an offer to sell or the solicitation of an offer to buy nor shall there be any sale of the Bonds by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale.

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OFFICIAL STATEMENT

CITY OF SYRACUSE ONONDAGA COUNTY, NEW YORK

relating to

\$24,751,555* PUBLIC IMPROVEMENT BONDS, SERIES 2022A

This Official Statement, including the cover pages, inside cover page and appendices hereto, presents certain information relating to the City of Syracuse, in Onondaga County, in the State of New York, (the "City," "County," and "State," respectively) in connection with the sale of \$24,751,555* Public Improvement Bonds, Series 2022A (the "Bonds").

All quotations from and summaries and explanations of provisions of the Constitution and laws of the State as well as the acts and proceedings of the City contained herein do not purport to be complete and are qualified in their entirety by reference to the official compilations thereof and all references to the Bonds and Notes as well as the proceedings of the City relating thereto are qualified in their entirety by reference to the definitive form of such obligations and such proceedings.

THE BONDS

Description

The Bonds will be dated the date of delivery, bear interest payable in each year until maturity, and mature as shown on the inside cover page of this Official Statement. The Bonds will be issued in book-entry-only form, registered in the name of Cede & Co., as nominee for The Depository Trust Company, New York, New York ("DTC"). See "Book-Entry-Only System" herein. Individual purchases shall be made in denominations of \$5,000 or integral multiples thereof, except for one necessary odd denomination maturing in 2024.

Principal of and interest on the Bonds will be made by the City to DTC, which will in turn remit such principal and interest to its Participants (defined herein), for subsequent disbursement to the Beneficial Owners (defined herein) of the Bonds as described herein. The Bonds may be transferred in the manner described on the Bonds and as referenced in certain proceedings of the City referred to therein.

The Bonds will be dated June 30, 2022, will bear interest payable semiannually on May 15 and November 15 of each year, beginning on May 15, 2023, and will mature May 15 in the years and amounts as set forth on the inside cover page hereof. The record date (the "Record Date") for the Bonds is the last business day of the calendar month preceding each interest payment date.

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^{*} Preliminary, subject to change.

Authority for and Purpose of the Bonds

Authorization. The Bonds are issued pursuant to the Constitution and laws of the State, including the Local Finance Law, the City Charter and various bond ordinances adopted by the Common Council of the City and approved by the Mayor. Certain details of the Bonds will be prescribed by certificates of the Commissioner of Finance executed pursuant to powers delegated to him to fix terms, form and contents of the Bonds and to provide for the sale thereof.

Purpose. The proceeds of the Bonds will provide new money for various purposes as listed below.

Purpose	The Bonds	Date of Authorization
Municipal Sidewalk Program	\$3,000,000	6/7/2021
LED Street Lighting Upgrade	2,742,671	8/20/2018
Parking Meters	2,025,000	2/28/2022
Heavy Rescue Replacement	1,500,000	1/10/2022
Settlement - Grant	1,449,110	3/28/2022
Apparatus Replace - Aerial	1,400,000	1/10/2022
Lafayette PRV Replacement Proj	1,300,000	9/13/2021
DPW Capital Equipment	1,262,156	2/7/2022
Parking Garage Rehab	1,000,000	1/24/2022
CIP Equipment - Packers	938,090	2/7/2022
Settlement - Cooper Crouse Hinds	850,000	5/23/2022
Parking Garage Rehab	700,000	6/21/2021
DPW Sweep & Flush Equip	631,578	7/12/2021
Fiber Optic Trunk Replacement	600,000	8/2/2021
Facility Rehab Project	575,000	7/12/2021
W Genesee St Rd Improvement	502,950	11/23/2020
South Geddes Safety	400,000	1/24/2022
Clinton Two Way Conversion	325,000	2/28/2022
Fire Apparatus Replacement	320,000	3/28/2022
Complete Streets	300,000	7/31/2017
Pools & Fountains	300,000	3/14/2022
City Owned Sidewalks	300,000	5/9/2022
Eastwood Parks Improvements	300,000	8/23/2021
Settlement - George	295,000	6/21/2021
Interstate Lighting Upgrade	250,000	1/24/2022
Downtown Mill & Pave	225,000	9/25/2017
Legacy Street Lighting	190,000	2/4/2019
Settlement - Morris	190,000	9/27/2021
Pass' Aboretum Park Fence	180,000	9/13/2021
Legacy Street Lighting	170,000	7/12/2021
Parks Chipper and Pickup	170,000	8/2/2021
Legacy Street Lighting	150,000	6/21/2021
Parks Paving Projects	100,000	9/13/2021
Creekwalk Amenities	40,000	3/30/2020
Barry Park Improvements	40,000	5/9/2022
Radar Sign	30,000	4/25/2022
	\$24,751,555	•

Optional Redemption for the Bonds

Call Provisions. The Bonds maturing on or before May 15, 2030 will not be subject to redemption prior to maturity. The Bonds maturing on May 15, 2031, and thereafter, will be subject to redemption prior to maturity, at the option of the City, in whole or in part, and if in part, in any order of their maturity and in any amount within a maturity (selected by lot within a maturity) on any date on or after May 15, 2030 at par plus accrued interest to the redemption date.

Notification Procedures. If less than all of the Bonds of any maturity are to be redeemed, the particular bonds of such maturity to be redeemed shall be selected by lot in any customary manner of selection as determined by the Commissioner of Finance of the City. Notice of such call for redemption shall be given by mailing such notice to the registered holder not more than sixty (60) days nor less than thirty (30) days prior to such date. Notice of redemption having been given as aforesaid, the bonds so called for redemption shall, on the date for redemption set forth in such call for redemption, become due and payable together with interest to such redemption date. Interest shall cease to be paid thereon after such redemption date (See "Book-Entry-Only System" for additional information concerning redemptions).

Book-Entry-Only System

The Depository Trust Company ("DTC"), New York, New York, will act as securities depository for the Bonds. Such Bonds will be issued as fully-registered Bond registered in the name of Cede & Co. (DTC's partnership nominee) or such other name as may be requested by an authorized representative of DTC. One fully registered certificate per maturity will be issued and deposited with DTC.

DTC is a limited-purpose trust company organized under the New York Banking Law, a "banking organization" within the meaning of the New York Banking Law, a member of the Federal Reserve System, a "clearing corporation" within the meaning of the New York Uniform Commercial Code, and a "clearing agency" registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC's participants ("Direct Participants") deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants' accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations. DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation ("DTCC"). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies. DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly ("Indirect Participants"). The DTC Rules applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at www.dtcc.com and www.dtc.org.

Purchases of the Bonds under the DTC system must be made by or through Direct Participants, which will receive a credit for the Bonds on DTC's records. The ownership interest of each actual purchaser of each note ("Beneficial Owner") is in turn to be recorded on the Direct and Indirect Participants' records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the Bonds are to be accomplished by entries made on the books of Direct and Indirect Participants acting on behalf of Beneficial Owners. Beneficial Owners will not receive certificates representing their ownership interests in the Bonds, except in the event that use of the book-entry system for the Bonds is discontinued.

To facilitate subsequent transfers, all Bonds deposited by Direct Participants with DTC are registered in the name of DTC's partnership nominee, Cede & Co., or such other name as may be requested by an authorized representative of DTC. The deposit of the Bonds with DTC and their registration in the name of Cede & Co. or such other DTC nominee do not effect any change in beneficial ownership. DTC has no knowledge of the actual Beneficial Owners of the Bonds; DTC's records reflect only the identity of the Direct Participants to whose accounts such Bonds are credited, which may or may not be the Beneficial Owners. The Direct and Indirect Participants will remain responsible for keeping account of their holdings on behalf of their customers.

Conveyance of notices and other communications by DTC to Direct Participants, by Direct Participants to Indirect Participants, and by Direct Participants and Indirect Participants to Beneficial Owners will be governed by arrangements among them, subject to any statutory or regulatory requirements as may be in effect from time to time.

Redemption notices shall be sent to DTC. If less than all of the Bonds within an issue are being redeemed, DTC's practice is to determine by lot the amount of the interest of each Direct Participant in such issue to be redeemed.

Neither DTC nor Cede & Co. (nor any other DTC nominee) will consent or vote with respect to the Bonds unless authorized by a Direct Participant in accordance with DTC's Money Market Instruments (MMI) Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the City as soon as possible after the record date. The Omnibus Proxy assigns Cede & Co.'s consenting or voting rights to those Direct Participants to whose accounts the Bonds are credited on the record date (identified in a listing attached to the Omnibus Proxy).

Principal and interest payments on the Bonds will be made to Cede & Co., or such other nominee as may be requested by an authorized representative of DTC. DTC's practice is to credit Direct Participants' accounts upon DTC's receipt of funds and corresponding detail information from the City, on payable date in accordance with their respective holdings shown on DTC's records. Payments by Participants to Beneficial Owners will be governed by standing instructions and customary practices, as is the case with securities held for the accounts of customers in bearer form or registered in "street name," and will be the responsibility of such Participant and not of DTC or the City, subject to any statutory or regulatory requirements as may be in effect from time to time. Payment of principal and interest payments to Cede & Co. (or such other nominee as may be requested by an authorized representative of DTC) is the responsibility of the City, disbursement of such payments to Direct Participants will be the responsibility of DTC, and disbursement of such payments to the Beneficial Owners will be the responsibility of DTC, and Indirect Participants.

DTC may discontinue providing its services as depository with respect to the Bonds at any time by giving reasonable notice to the City. Under such circumstances, in the event that a successor depository is not obtained, note certificates are required to be printed and delivered.

The City may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, note certificates will be printed and delivered to DTC.

The information in this section concerning DTC and DTC's book-entry system has been obtained from sources that the City believes to be reliable, but the City takes no responsibility for the accuracy thereof.

THE INFORMATION CONTAINED IN THE ABOVE SECTION CONCERNING DTC AND DTC'S BOOKENTRY SYSTEM HAS BEEN OBTAINED FROM SAMPLE OFFERING DOCUMENT LANGUAGE SUPPLIED BY DTC, BUT THE CITY TAKES NO RESPONSIBILITY FOR THE ACCURACY OR COMPLETENESS THEREOF OR AS TO THE ABSENCE OF MATERIAL CHANGES IN SUCH INFORMATION SUBSEQUENT TO THE DATE HEREOF.

THE CITY CANNOT AND DOES NOT GIVE ANY ASSURANCES THAT DTC, DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC WILL DISTRIBUTE TO THE BENEFICIAL OWNERS OF THE BONDS (1) PAYMENTS OF PRINCIPAL OF OR INTEREST OR REDEMPTION PREMIUM ON THE BONDS (2) CONFIRMATIONS OF THEIR OWNERSHIP INTERESTS IN THE BONDS OR (3) OTHER NOTICES SENT TO DTC OR CEDE & CO., ITS PARTNERSHIP NOMINEE, AS THE REGISTERED OWNER OF THE BONDS, OR THAT THEY WILL DO SO ON A TIMELY BASIS, OR THAT DTC, DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS WILL SERVE AND ACT IN THE MANNER DESCRIBED IN THIS OFFICIAL STATEMENT.

THE CITY WILL NOT HAVE ANY RESPONSIBILITY OR OBLIGATIONS TO DTC, THE DIRECT PARTICIPANTS, THE INDIRECT PARTICIPANTS OF DTC OR THE BENEFICIAL OWNERS WITH RESPECT TO (1) THE ACCURACY OF ANY RECORDS MAINTAINED BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC; (2) THE PAYMENT BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC OF ANY AMOUNT DUE TO ANY BENEFICIAL OWNER IN RESPECT OF THE PRINCIPAL AMOUNT OF OR INTEREST OR REDEMPTION PREMIUM ON THE BONDS; (3) THE DELIVERY BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC OF ANY NOTICE TO ANY BENEFICIAL OWNER THAT IS REQUIRED OR PERMITTED TO BE GIVEN TO OWNERS; OR (4) ANY CONSENT GIVEN OR OTHER ACTION TAKEN BY DTC AS THE REGISTERED HOLDER OF THE BONDS.

Source: The Depository Trust Company

NATURE OF OBLIGATION

The Bonds, when duly issued and paid for, will constitute a contract between the City and the holder thereof.

Holders of any series of bonds or notes of the City may bring an action or commence a proceeding in accordance with the civil practice law and rules to enforce the rights of the holders of such series of notes or bonds.

The Bonds will be general obligations of the City and will contain a pledge of the faith and credit of the City for the payment of the principal thereof and the interest thereon as required by the Constitution and laws of the State. For the payment of such principal and interest, the City has power and statutory authorization to levy ad valorem taxes on all real property within the City, subject to applicable statutory limitations.

Although the State Legislature is restricted by Article VIII, Section 12 of the State Constitution from imposing limitations on the power to raise taxes to pay "interest on or principal of indebtedness theretofore contracted" prior to the effective date of any such legislation, the New York State Legislature may from time to time impose additional limitations or requirements on the ability to increase a real property tax levy or on the methodology, exclusions or other restrictions of various aspects of real property taxation (as well as on the ability to issue new indebtedness). On June 24, 2011, Chapter 97 of the Laws of 2011 was signed into law by the Governor (the "Tax Levy Limitation Law"). The Tax Levy Limitation Law applies to local governments and School Districts in the State (with certain exceptions) and imposes additional procedural requirements on the ability of municipalities and School Districts to levy certain year-to-year increases in real property taxes.

Under the Constitution of the State, the City is required to pledge its faith and credit for the payment of the principal of and interest on the Bonds and is required to raise real estate taxes, and without specification, other revenues, if such levy is necessary to repay such indebtedness. While the Tax Levy Limitation Law imposes a statutory limitation on the City's power to increase its annual tax levy with the amount of such increase limited by the formulas set forth in the Tax Levy Limitation Law, it also provides the procedural method to surmount that limitation. See "Tax Levy Limitation Law," herein.

The Constitutionally-mandated general obligation pledge of municipalities and School Districts in New York State has been interpreted by the Court of Appeals, the State's highest court, in <u>Flushing National Bank v. Municipal Assistance Corporation for the City of New York</u>, 40 N.Y.2d 731 (1976), as follows:

"A pledge of the city's faith and credit is both a commitment to pay and a commitment of the city's revenue generating powers to produce the funds to pay. Hence, an obligation containing a pledge of the City's "faith and credit" is secured by a promise both to pay and to use in good faith the city's general revenue powers to produce sufficient funds to pay the principal and interest of the obligation as it becomes due. That is why both words, "faith" and "credit" are used and they are not tautological. That is what the words say and this is what the courts have held they mean... So, too, although the Legislature is given the duty to restrict municipalities in order to prevent abuses in taxation, assessment, and in contracting of indebtedness, it may not constrict the City's power to levy taxes on real estate for the payment of interest on or principal of indebtedness previously contracted... While phrased in permissive language, these provisions, when read

together with the requirement of the pledge and faith and credit, express a constitutional imperative: debt obligations must be paid, even if tax limits be exceeded".

In addition, the Court of Appeals in the Flushing National Bank case has held that the payment of debt service on outstanding general obligation bonds and notes takes precedence over fiscal emergencies and the police power of political subdivisions in New York State.

The pledge has generally been understood as a promise to levy property taxes without limitation as to rate or amount to the extent necessary to cover debt service due to language in Article VIII Section 10 of the Constitution which provides an exclusion for debt service from Constitutional limitations on the amount of a real property tax levy, insuring the availability of the levy of property tax revenues to pay debt service. As the Flushing National Bank Court noted, the term "faith and credit" in its context is "not qualified in any way". Indeed, in Flushing National Bank v. Municipal Assistance Corp., 40 N.Y.2d 1088 (1977), the Court of Appeals described the pledge as a direct constitutional mandate. In Quirk v. Municipal Assistance Corp., 41 N.Y.2d 644 (1977), the Court of Appeals stated that, while holders of general obligation debt did not have a right to particular revenues such as sales tax, "with respect to traditional real estate tax levies, the bondholders are constitutionally protected against an attempt by the State to deprive the city of those revenues to meet its obligations." According to the Court in Quirk, the State Constitution "requires the city to raise real estate taxes, and without specification other revenues, if such a levy be necessary to repay indebtedness."

In addition, the Constitution of the State requires that every county, city, town, village, and School District in the State provide annually by appropriation for the payment of all interest and principal on its serial bonds and certain other obligations, and that, if at any time the respective appropriating authorities shall fail to make such appropriation, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. In the event that an appropriating authority were to make an appropriation for debt service and then decline to expend it for that purpose, this provision would not apply. However, the Constitution of the State does also provide that the fiscal officer of any county, city, town, village, or School District may be required to set apart and apply such first revenues at the suit of any holder of any such obligations.

In <u>Quirk v. Municipal Assistance Corp.</u>, the Court of Appeals described this as a "first lien" on revenues, but one that does not give holders a right to any particular revenues. It should thus be noted that the pledge of the faith and credit of a political subdivision in New York State is a pledge of an issuer of a general obligation bond or note to use its general revenue powers, including, but not limited to, its property tax levy to pay debt service on such obligations, but that such pledge may not be interpreted by a court of competent jurisdiction to include a constitutional or statutory lien upon any particular revenues.

While the courts in New York State have historically been protective of the rights of holders of general obligation debt of political subdivisions, it is not possible to predict what a future court might hold.

Tax Levy Limitation Law

On June 24, 2011, the Governor signed into law the Tax Levy Limitation Law. The Tax Levy Limitation Law applies to all local governments, including School Districts (with the exception of New York City, the counties comprising New York City and School Districts in New York City, Buffalo, Rochester, Syracuse and Yonkers, the latter four of which are affected indirectly by applicability to their respective city). It also applies to independent special districts and to town and county improvement districts as part of their parent municipalities' tax levies.

The Tax Levy Limitation Law restricts, among other things, the amount of real property taxes (including assessments of certain special improvement districts) that may be levied by or on behalf of a municipality in a particular year, beginning with fiscal years commencing on or after January 1, 2012 and thereafter, without providing an exclusion for debt service on obligations issued by the City. Pursuant to the Tax Levy Limitation Law, the tax levy of a municipality cannot increase by more than the lesser of (i) two percent (2%) or (ii) the annual increase in the consumer price index ("CPI"), over the amount of the prior year's tax levy. Certain adjustments would be permitted for taxable real property full valuation increases due to changes in physical or quantity growth in the real property base as defined in Section 1220 of the Real Property Tax Law. A municipality may exceed the tax levy limitation for the coming fiscal year only if the governing body of such municipality first enacts, by at least a

sixty percent vote of the total voting strength of the board, a local law (resolution in the case of fire districts and certain special districts) to override such limitation for such coming fiscal year only. There are permissible exceptions to the tax levy limitation provided in the Tax Levy Limitation Law, including expenditures made on account of certain tort settlements and certain increases in the average actuarial contribution rates of the New York State and Local Employees' Retirement System, the Police and Fire Retirement System, and the Teachers' Retirement System. Municipalities are also permitted to carry forward a certain portion of their unused levy limitation from a prior year. Each municipality prior to adoption of its fiscal year budget must submit for review to the State Comptroller any information that is necessary in the calculation of its tax levy for such fiscal year.

The Tax Levy Limitation Law does not contain an exception from the levy limitation for the payment of debt service on either outstanding general obligation debt of municipalities or such debt incurred after the effective date of the Tax Levy Limitation Law (June 24, 2011).

While the Tax Levy Limitation Law may constrict an issuer's power to levy real property taxes for the payment of debt service on debt contracted after the effective date of the Tax Levy Limitation Law, it is clear that no statute is able (1) to limit an issuer's pledge of its faith and credit to the payment of any of its general obligation indebtedness or (2) to limit an issuer's levy of real property taxes to pay debt service on general obligation debt contracted prior to the effective date of the Tax Levy Limitation Law. Whether the Constitution grants a municipality authority to treat debt service payments as a constitutional exception to such a statutory tax levy limitation is not clear.

SPECIAL PROVISIONS AFFECTING REMEDIES UPON DEFAULT

General Municipal Law Contract Creditors' Provision. Each Bond and Note, when duly issued and paid for, will constitute a contract between the City and the holder thereof. Under current law, provision is made for contract creditors of the City to enforce payments upon such contracts, if necessary, through court action. Section 3-a of the General Municipal Law provides, subject to exceptions not pertinent, that the rate of interest to be paid by the City upon any judgment or accrued claim against it on an amount adjudged due to a creditor shall not exceed nine per centum per annum from the date due to the date of payment. This provision might be construed to have application to the holders of the Bonds in the event of a default in the payment of the principal of and interest on the Bonds.

Execution/Attachment of Municipal Property. As a general rule, property and funds of a municipal corporation serving the public welfare and interest have not been judicially subjected to execution or attachment to satisfy a judgment, although judicial mandates have been issued to officials to appropriate and pay judgments out of certain funds or the proceeds of a tax levy. In accordance with the general rule with respect to municipalities, judgments against the City may not be enforced by levy and execution against property owned by the City.

Authority to File For Municipal Bankruptcy. The Federal Bankruptcy Code allows public bodies, such as the counties, cities, towns and villages, recourse to the protection of a Federal Court for the purpose of adjusting outstanding indebtedness. Section 85.80 of the Local Finance Law contains specific authorization for any municipality in the State or its emergency control board to file a petition under any provision of Federal bankruptcy law for the composition or adjustment of municipal indebtedness.

The State has consented that any municipality in the State may file a petition with the United States District Court or court of bankruptcy under any provision of the laws of the United States, now or hereafter in effect, for the composition or adjustment of municipal indebtedness. Subject to such State consent, under the United States Constitution, Congress has jurisdiction over such matters and has enacted amendments to the existing federal bankruptcy statute, being Chapter 9 thereof, generally to the effect and with the purpose of affording municipal corporations, under certain circumstances, with easier access to judicially approved adjustment of debt, including judicial control over identifiable and unidentifiable creditors.

No current state law purports to create any priority for holders of the Bonds should the City be under the jurisdiction of any court, pursuant to the laws of the United States, now or hereafter in effect, for the composition or adjustment of municipal indebtedness.

The rights of the owners of Bonds to receive interest and principal from the City could be adversely affected by the restructuring of the City's debt under Chapter 9 of the Federal Bankruptcy Code. No assurance can be given that

any priority of holders of debt obligations issued by the City (including the Bonds) to payment from monies retained in any debt service fund or from other cash resources would be recognized if a petition were filed by or on behalf of the City under the Federal Bankruptcy Code or pursuant to other subsequently enacted laws relating to creditors' rights; such monies might, under such circumstances, be paid to satisfy the claims of all creditors generally.

Under the Federal Bankruptcy Code, a petition may be filed in the Federal Bankruptcy court by a municipality which is insolvent or unable to meet its debts as they mature. Generally, the filing of such a petition operates as a stay of any proceeding to enforce a claim against the municipality. The Federal Bankruptcy Code also requires that a plan be filed for the adjustment of the municipality's debt, which may modify or alter the rights of creditors and which could be secured. Any plan of adjustment confirmed by the court must be approved by the requisite number of creditors. If confirmed by the bankruptcy court, the plan would be binding upon all creditors affected by it.

State Debt Moratorium Law. There are separate State law provisions regarding debt service moratoriums enacted into law in 1975.

At the Extraordinary Session of the State Legislature held in November, 1975, legislation was enacted which purported to suspend the right to commence or continue an action in any court to collect or enforce certain short-term obligations of The City of New York. The effect of such act was to create a three-year moratorium on actions to enforce the payment of such obligations. On November 19, 1976, the Court of Appeals, the State's highest court, declared such act to be invalid on the ground that it violates the provisions of the State Constitution requiring a pledge by such City of its faith and credit for the payment of obligations.

As a result of the Court of Appeals decision in Flushing National Bank v. Municipal Assistance Corporation for the City of New York, 40 N.Y.2d 731 (1976), the constitutionality of that portion of Title 6-A of Article 2 of the Local Finance Law, as described below, enacted at the 1975 Extraordinary Session of the State legislature authorizing any county, city, town or village with respect to which the State has declared a financial emergency to petition the State Supreme Court to stay the enforcement against such municipality of any claim for payment relating to any contract, debt or obligation of the municipality during the emergency period, is subject to doubt. In any event, no such emergency has been declared with respect to the City.

Right of Municipality or State to Declare a Municipal Financial Emergency and Stay Claims Under State Debt Moratorium Law. The State Legislature is authorized to declare by special act that a state of financial emergency exists in any county, city, town or village. (The provision does not by its terms apply to School Districts or fire districts.) In addition, the State Legislature may authorize by special act establishment of an "emergency financial control board" for any county, city, town or village upon determination that such a state of financial emergency exists. Thereafter, unless such special act provides otherwise, a voluntary petition to stay claims may be filed by any such municipality (or by its emergency financial control board in the event said board requests the municipality to petition and the municipality fails to do so within five days thereafter). A petition filed in supreme court in the county in which the municipality is located in accordance with the requirements of Title 6-A of the Local Finance Law ("Title 6-A") effectively prohibits the doing of any act for ninety days in the payment of claims against the municipality, including payment of debt service on outstanding indebtedness.

This includes staying the commencement or continuation of any court proceedings seeking payment of debt service due, the assessment, levy or collection of taxes by or for the municipality or the application of any funds, property, receivables or revenues of the municipality to the payment of debt service. The stay can be vacated under certain circumstances with provisions for the payment of amounts due or overdue upon a demand for payment in accordance with the statutory provisions set forth therein. The filing of a petition may be accompanied with a proposed repayment plan which, upon court order approving the plan, may extend any stay in the payment of claims against the municipality for such "additional period of time as is required to carry out fully all the terms and provisions of the plan with respect to those creditors who accept the plan or any benefits thereunder." Court approval is conditioned, after a hearing, upon certain findings as provided in Title 6-A.

A proposed plan can be modified prior to court approval or disapproval. After approval, modification is not permissible without court order after a hearing. If not approved, the proposed plan must be amended within ten days or else the stay is vacated and claims, including debt service due or overdue, must be paid. It is at the discretion of the court to permit additional filings of amended plans and continuation of any stay during such time. A stay may

be vacated or modified by the court upon motion of any creditor if the court finds after a hearing that the municipality has failed to comply with a material provision of an accepted repayment plan or that due to a "material change in circumstances" the repayment plan is no longer in compliance with statutory requirements.

Once an approved repayment plan has been completed, the court, after a hearing upon motion of any creditor, or a motion of the municipality or its emergency financial control board, will enter an order vacating any stay then in effect and enjoining of creditors who accepted the plan or any benefits thereunder from commencing or continuing any court action, proceeding or other act described in Title 6-A relating to any debt included in the plan.

Title 6-A requires notice to all creditors of each material step in the proceedings. Court determinations adverse to the municipality or its financial emergency control board are appealable as of right to the appellate division in the judicial department in which the court is located and thereafter, if necessary, to the Court of Appeals. Such appeals stay the judgment or appealed from and all other actions, special proceedings or acts within the scope of Section 85.30 of Title 6-A pending the hearing and determination of the appeals.

Whether Title 6-A is valid under the Constitutional provisions regarding the payment of debt service is not known. However, based upon the decision in the <u>Flushing National Bank</u> case described above, its validity is subject to doubt.

While the State Legislature has from time to time adopted legislation in response to a municipal fiscal emergency and established public benefit corporations with a broad range of financial control and oversight powers to oversee such municipalities, generally such legislation has provided that the provisions of Title 6-A are not applicable during any period of time that such a public benefit corporation has outstanding indebtedness issued on behalf of such municipality.

Fiscal Stress and State Emergency Financial Control Boards. Pursuant to Article IX Section 2(b)(2) of the State Constitution, any local government in the State may request the intervention of the State in its "property, affairs and government" by a two-thirds vote of the total membership of its legislative body or on request of its chief executive officer concurred in by a majority of such membership. This has resulted in the adoption of special acts for the establishment of public benefit corporations with varying degrees of authority to control the finances (including debt issuance) of the cities of Buffalo, Troy and Yonkers and the County of Nassau. The specific authority, powers and composition of the financial control boards established by these acts varies based upon circumstances and needs. Generally, the State legislature has granted such boards the power to approve or disapprove budget and financial plans and to issue debt on behalf of the municipality, as well as to impose wage and/or hiring freezes and approve collective bargaining agreements in certain cases. Implementation is left to the discretion of the board of the public benefit corporation. Such a State financial control board was first established for New York City in 1975. In addition, on a certificate of necessity of the governor reciting facts which in the judgment of governor constitute an emergency requiring enactment of such laws, with the concurrences of two-thirds of the members elected in each house of the State legislature, the State is authorized to intervene in the "property, affairs and governments" of local government units. This occurred in the case of the County of Erie in 2005. The authority of the State to intervene in the financial affairs of local government is further supported by Article VIII, Section 12 of the Constitution, which declares it to be the duty of the State legislature to restrict, subject to other provisions of the Constitution, the power of taxation, assessment, borrowing money and contracting indebtedness and loaning the credit of counties, cities, towns and villages so as to prevent abuses in taxation and assessment and in contracting indebtedness by them.

In 2013, the State established a new state advisory board to assist counties, cities, towns and villages in financial distress. The Financial Restructuring Board for Local Governments (the "FRB"), is authorized to conduct a comprehensive review of the finances and operations of any such municipality deemed by the FRB to be fiscally eligible for its services upon request by resolution of the municipal legislative body and concurrence of its chief executive. The FRB is authorized to make recommendations for, but cannot compel improvement of fiscal stability, management and delivery of municipal services, including shared services opportunities and is authorized to offer grants and/or loans of up to \$5,000,000 through a Local Government Performance and Efficiency Program to undertake certain recommendations. If a municipality agrees to undertake the FRB recommendations, it will be automatically bound to fulfill the terms in order to receive the aid.

The FRB is also authorized to serve as an alternative arbitration panel for binding arbitration.

Although from time to time there have been proposals for the creation of a statewide financial control board with broad authority over local governments in the State, the FRB does not have emergency financial control board powers to intervene such as the public benefit corporations established by special acts as described above. Several municipalities in the State are presently working with the FRB. School Districts and fire districts are not eligible for FRB assistance.

As of the date of this Official Statement, the City has indicated they have no intention of submitting an application to the FRB.

Constitutional Non-Appropriation Provision. There is in the Constitution of the State, Article VIII, Section 2, the following provision relating to the annual appropriation of monies for the payment of due principal of and interest on indebtedness of every county, city, town, village and School District in the State: "If at any time the respective appropriating authorities shall fail to make such appropriations, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. The fiscal officer of any county, city, town, village or School District may be required to set aside and apply such revenues as aforesaid at the suit of any holder of obligations issued for any such indebtedness." This constitutes a specific non-exclusive constitutional remedy against a defaulting municipality or School District; however, it does not apply in a context in which monies have been appropriated for debt service but the appropriating authorities decline to use such monies to pay debt service. However, Article VIII, Section 2 of the Constitution of the State also provides that the fiscal officer of any county, city, town, village or School District may be required to set apart and apply such revenues at the suit of any holder of any obligations of indebtedness issued with the pledge of the faith of the credit of such political subdivision. See "General Municipal Law Contract Creditors' Provision" herein.

The Constitutional provision providing for first revenue set asides does not apply to tax anticipation notes, revenue anticipation notes or bond anticipation notes.

Default Litigation. In prior years, certain events and legislation affecting a holder's remedies upon default have resulted in litigation. While courts of final jurisdiction have upheld and sustained the rights of noteholders and bondholders, such courts might hold that future events including financial crises as they may occur in the State and in political subdivisions of the State require the exercise by the State or its political subdivisions of emergency and police powers to assure the continuation of essential public services prior to the payment of debt service. See "Nature of Obligation" and "State Debt Moratorium Law" herein.

No Past Due Debt. No principal of or interest on City indebtedness is past due. The City has never defaulted in the payment of the principal of and interest on any indebtedness.

MARKET FACTORS

The financial and economic condition of the City as well as the market for the Bonds could be affected by a variety of factors, some of which are beyond the City's control. There can be no assurance that adverse events in the State and in other jurisdictions, including, for example, the seeking by a municipality or large taxable property owner of remedies pursuant to the Federal Bankruptcy Code or otherwise, will not occur which might affect the market price of and the market for the Bonds. If a significant default or other financial crisis should occur in the affairs of the State or another jurisdiction or any of its agencies or political subdivisions thereby impairing the acceptability of obligations issued by borrowers within the State, both the ability of the City to arrange for additional borrowings, and the market for and market value of outstanding debt obligations, including the Bonds, could be adversely affected.

There can be no assurance that the State appropriation for State aid to the City will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the City can be paid only if the State has such monies available therefor. The availability of such monies and the timeliness of such payment may also be affected by a delay in the adoption of the State budget and other circumstances, including State fiscal stress. In any event, State aid appropriated and apportioned to the City can be paid only if the State has such monies available therefor. (See "State Aid" herein).

Should the City fail to receive monies expected from the State in the amounts and at the times expected, the City is permitted to issue revenue anticipation notes in anticipation of the receipt of delayed State aid.

If and when a holder of any of the Bonds should elect to sell a Bond prior to its maturity, there can be no assurance that a market shall have been established, maintained and be in existence for the purchase and sale of any of the Bonds. In addition, the price and principal value of the Bonds is dependent on the prevailing level of interest rates; if interest rates rise, the price of a bond will decline, causing the bondholder to incur a potential capital loss if such bond or note is sold prior to its maturity.

Amendments to the U.S. Internal Revenue Code could reduce or eliminate the favorable tax treatment granted to municipal debt, including the Bonds and other debt issued by the City. Any such future legislation could have an adverse effect on the market value of the Bonds (See "Tax Matters" herein).

The enactment of Chapter 97 of the Laws of 2011 on June 24, 2011, which imposes a tax levy limitation upon municipalities, School Districts, including the City, and fire districts in the State could have an impact upon operations of the City and as a result, the market price for the Bonds. (See "Tax Levy Limitation Law," herein.)

An outbreak of disease or similar public health threat, such as the COVID-19 outbreak, could have an adverse impact on the City's financial condition and operating results. Currently, the spread of COVID-19, a respiratory disease caused by a new strain of coronavirus, has spread globally, including to the United States, and has been declared a pandemic by the World Health Organization. The outbreak of the disease has affected travel, commerce and financial markets globally and is widely expected to affect economic growth worldwide. The current outbreak has caused the Federal government to declare a national state of emergency. The State has also declared a state of emergency and the Governor has taken steps designed to mitigate the spread and impact of COVID-19, including closing schools and non-essential businesses. The impact to the City's operations and finances cannot be predicted at this time due to the dynamic nature of the COVID-19 outbreak, including uncertainties relating to its (i) duration, and (ii) severity, as well as with regard to what actions may be taken by governmental and other health care authorities, including the State and County, to contain or mitigate its impact. There can be no assurances that the spread of COVID-19 will not materially adversely impact the financial condition of the City. Potential impacts to the City include, but are not limited to, costs and challenges to maintain existing services with decreases in major revenues such as mortgage tax and sales tax. The City is monitoring the situation and will take such proactive measures as may be required to maintain its operations and meet its obligations. The City continues to evaluate various options to mitigate the impact of COVID-19 on the City's finances, including cash flow borrowings, reductions of budgeted expenditures, and eligibility for federal or state aid for COVID-19 related costs and revenue losses.

THE STATE COMPTROLLER'S FISCAL STRESS MONITORING SYSTEM <u>AND COMPLANCE REVIEWS</u>

The New York State Comptroller has reported that New York State's School Districts and municipalities are facing significant fiscal challenges. As a result, the Office of the State Comptroller ("OSC") has developed a Fiscal Stress Monitoring System ("FSMS") to provide independent, objectively measured and quantifiable information to School District and municipal officials, taxpayers and policy makers regarding the various levels of fiscal stress under which the State's School Districts and municipalities are operating.

The fiscal stress scores are based on financial information submitted as part of each School District's ST-3 report filed with the State Education Department annually, and each municipality's annual report filed with the State Comptroller. Using financial indicators that include year-end fund balance, cash position and patterns of operating deficits, the system creates an overall fiscal stress score which classifies whether a School District or municipality is in "significant fiscal stress", in "moderate fiscal stress," as "susceptible to fiscal stress" or "no designation". Entities that do not accumulate the number of points that would place them in a stress category will receive a financial score but will be classified in a category of "no designation." This classification should not be interpreted to imply that the entity is completely free of fiscal stress conditions. Rather, the entity's financial information, when objectively

scored according to the FSMS criteria, did not generate sufficient points to place them in one of the three established stress categories.

The most current applicable report of the State Comptroller designates the City as "No Designation." The City's score was 11.7% and an environmental score of 50.0%.

See the State Comptroller's official website for more information on FSMS. Reference to this website implies no warranty of accuracy of information therein.

The financial affairs of the City are subject to periodic compliance reviews by OSC to ascertain whether the City has complied with the requirements of various State and federal statutes.

LITIGATION

Litigation. Various actions are pending against the City. Most often, the allegations asserted relate to circumstances involving false arrest, malicious prosecution, negligence and the violation of civil rights. Most suits seek money damages but others demand the performance of, or the forbearance from, certain acts. In the opinion of the City's Corporation Counsel, the resolution of various matters of litigation threatened or currently pending will not have an adverse material effect on the City's financial position. However, the following matters each present some possibility of a financial award of \$400,000 or greater.

Notice of Claim: Ann E. Macbain as proposed administrator of the estate of Allison Lakie – against – the City of Syracuse, et al.

Police were called to the house of an approximately 30 year old female, Allison Lakie, who was threatening to commit suicide with a large kitchen knife. After almost two hours of negotiation, Lakie who had already cut herself severely, started a large house fire in the kitchen. Officers attempted to get Ms. Lakie to drop the knife, to which she later responded by charging out of the kitchen with the knife toward officers. Ms. Lakie was shot by the officers. Ms. Lakie's estate have served a Notice of Claim pursuant to New York General Municipal Law. If the case becomes a civil action, is not dismissed, and goes to trial then it is possible the City could be subject to a judgment greater than \$400,000.

Notice of Claim: *Anthony Broadwater – against – the City of Syracuse, et al.*

Anthony Broadwater was convicted for the sexual assault of Alice Sebold in the early 1980s and served a 16 year sentence in state prison. In 2021, as a result of evidentiary issues and an improperly suggestive line-up identification, the court dismissed Mr. Broadwater's indictment. Mr. Broadwater served a Notice of Claim pursuant to New York General Municipal Law. If the case becomes a civil action, is not dismissed, and goes to trial then it is possible the City could be subject to a judgment greater than \$400,000.

Brandon Hanks v. City of Syracuse, et al.

A City of Syracuse police officer, Plaintiff Brandon Hanks, is suing the City of Syracuse and a series of City employees of employment discrimination related to a delay in him being transferred to a temporary unit within Syracuse Police Department ("SPD"). Pre-answer motions to dismiss have been briefed and awaiting a decision from the Court for total dismissal. After discovery if the case is not dismissed, if the matter proceeds to trial, it is possible the City could be subject to a judgment greater than \$400,000.

Adrian Jones v. City of Syracuse, et al.

Officers were responding at night to a shots fired call, and when arriving on the scene identified Plaintiff Adrian Jones who fled on foot. After giving chase, Plaintiff surrendered himself to SPD officers. While fleeing officers, Plaintiff discarded a firearm in a trash bin, which was later recovered by SPD officers. Although the gun was not used in the shots fired, Plaintiff pleaded guilty of illegally possessing the weapon and served three years in prison. On appeal, Plaintiff's conviction was overturned solely on the ground that the handgun salvaged from the trash bin was considered inadmissible evidence. Plaintiff now sues the City for a deprivation of his right to a fair trial. The case is currently in discovery. If the matter proceeds to trial, it is possible the City could be subject to a judgment greater than \$400,000.

Darnell Williams v. City of Syracuse, et al.

A nine year old girl was waiting at a bus stop before school, when a male matching the description of Plaintiff Darnell Williams attempted to abduct her. The victim scared away the attempted abductor. Plaintiff was confined for seven months awaiting trial, when he was released on bail. Plaintiff did not appear at his own criminal trial, and was found not guilty by a jury while *in absentia*. Plaintiff now sues the City of Syracuse and Syracuse Police Department ("SPD") Detectives for, among other things, false arrest and malicious prosecution. Parties are engaged in motion practice to dismiss certain claims pre-discovery. Discovery is starting in concurrence with this motion practice. If the matter proceeds to trial, it is possible the City could be subject to a judgment greater than \$400,000.

Peter Dixon v. City of Syracuse, et al.

Peter Dixon was questioned by police as he sat in his parked vehicle within the City of Syracuse. Mr. Dixon refused to open the vehicle for officers and, instead of complying with lawful orders, attempted to flee the scene in his vehicle. In doing so, he endangered the lives of multiple officers, prompting former SPD officer Ahmad Mims to fire his weapon at the vehicle. Plaintiff engaged in a high speed pursuit with SPD and was arrested 7 miles away after a chase on the Onondaga Nation. Plaintiff is suing the named SPD officers for excessive use of force and is also bringing a *Monell* claim against the City of Syracuse. Currently, discovery is ongoing in this case after dispositive pre-answer motion practice. If the matter proceeds to trial, it is possible the City could be subject to a judgment greater than \$400,000.

Jason Lopez v. Eric Gerace

Officer Gerace was responding to a domestic disturbance in the early hours of the morning, when confronting Plaintiff Jason Lopez. Plaintiff, who was under the influence, through a can at Officer Gerace's partner and charged at him, at which point Officer Gerace intervened and used force to arrest Plaintiff. Plaintiff is suing the Officer Gerace excessive use of force. Currently, discovery is ongoing. If the matter proceeds to trial, it is possible the City could be subject to a judgment greater than \$400,000.

Kadeem Arrindel-Martin v. City of Syracuse, et al.

Plaintiff shot by Syracuse Police Officers while trying to flee arrest and endangering lives of officers by driving his vehicle at them. Plaintiff alleges that Officers exercised excessive use of force, failure to provide medical care, and otherwise failed to intervene. Case is approaching the end of discovery. If the matter proceeds to trial, it is possible the City Defendants could be subject to a judgment greater than \$400,000.

Harold Blackmon, et al. v. City of Syracuse, et al.

A group of eleven current and former employees of the City Department of Public Works allege employment discrimination. Discovery has closed and a motion for summary judgment made by Defendants is pending before the Court. If that motion is not successful, the City and the Defendants will likely have to go to trial as to the remaining Plaintiffs. Damages (if liability is determined) could exceed \$400,000 solely because of the number of Plaintiffs.

Lilian Cervantes, et al. v. City of Syracuse, et al.

Plaintiffs were operating their vehicle at the intersection of S. Collingwood Ave. and the Interstate 690 on-ramp on Burnet Ave. when Third-Party Defendant vehicle negligently and carelessly struck Plaintiffs' vehicle when not properly signaling and making an erratic set of turns. Infant Plaintiff suffered severe injuries. The City is being sued for negligently designing the intersection, but the State of New York has been sued in the Court of Claims as the intersection is an on-ramp to an NYS highway. There has been a stay put in place as to discovery in the NYS Supreme Court case while the matter is being litigated in the NYS Court of Claims. Motions for summary judgment NYS Court of Claims. Infant Plaintiff's injuries may exceed \$400,000 if the City is held a certain percentage liable. However, the City has argued in its summary judgment papers that the design of the intersection was primarily orchestrated by New York State, relieving the City from liability.

Belinda Davis v. City of Syracuse, et al.

Plaintiff was a passenger in a vehicle that turned from a stop sign onto a road not controlled by a traffic control, and was then struck by a Syracuse Police Department vehicle. Plaintiff alleges to have suffered serious or permanent injuries form the accident, but the City may benefit from certain immunities under the emergency vehicle doctrine. Early stages of discovery, and the case has been inactive as a result of no progress being made by Plaintiff, but if the City is liable then damages could exceed \$400,000.

Tanajee Maddox v. City of Syracuse, et al.

Plaintiff, Administratrix of the Estate of decedent, Gary Terrance Porter, alleges that Mr. Porter was an unarmed man who was shot and killed by a Syracuse Police Officer during a shootout on Father's Day in 2016, with multiple shooters. There is evidence that decedent was armed and firing a weapon during the same incident. Discovery and depositions are ongoing. The damages sought by the Plaintiff are in excess of \$1 million. We will be better positioned to estimate liability after discovery. This is a companion case of *Tennyson v. City of Syracuse*, et al.

Evelyn Tennyson v. City of Syracuse, et al.

Plaintiff alleges she was shot in her leg by a Syracuse Police Officer, however, it is unclear as to whether Ms. Tennyson's was actually shot by the officer as there were multiple individuals who were firing weapons. The damages sought by the Plaintiff are in excess of \$1 million. Discovery and depositions are ongoing in this case. We will be better positioned to estimate liability after discovery. This is a companion case of *Maddox v. City of Syracuse, et al.*

Other Claims

In addition to the matters discussed above, the City reports that numerous claims are filed against it each year. Many claims are not actively pursued or are disposed of at little or no cost to the City. In the Corporation Counsel's opinion, it would be premature to express an opinion on any of these additional pending matters. However, a preliminary assessment of these claims indicates that the City's maximum liability for each individual claim is unlikely to exceed \$400,000.

Insurance. The City funds a self-insurance program from operating funds to protect itself against various forms of risks. Under the program, the City is self-insured for employee medical and dental benefits, unemployment benefits, workers' compensation and general liability claims. For the year ending June 30, 2021 the City paid \$1,630,824.18 from operating funds to settle various judgments and claims.

The City purchases commercial insurance for various risks and liabilities. Property insurance is utilized to protect all of the City's School Buildings, City Hall, the terminal building at Hancock International Airport, and certain other structures for losses in excess of \$100,000. Airport claims in excess of \$100,000 and aircraft losses exceeding \$5,000,000 are also covered by insurance policies.

Tax Litigation and Certiorari Claims. The City is a party to various tax certiorari proceedings instituted under Article 7 of the Real Property Tax Law. In these actions, taxpayers claim that their current real property assessments are excessive and ask that such assessments be reduced. Generally, tax claims request a refund of taxes in excess of the alleged assessment. Claims of this nature are filed continuously and some cases may not be settled for several years or more. It is not unusual for certain taxpayers to have multiple pending claims affecting a period of years. For the 2021 fiscal year the City expended \$17,905.72 to settle various tax refunds. For the current fiscal year, as of May 26, 2022, the City has expended no funds to settle any tax refunds.

It is not possible to provide an estimate concerning the possible outcome of pending tax certiorari cases. Tax certiorari claims are frequently settled for amounts substantially less than the original claims. The 2022 budget of City general fund includes an appropriation of \$40,000 to pay tax refunds. Pursuant to the Local Finance Law, the City issues debt from time to time to finance tax certiorari settlements.

Contingencies. The City participates in numerous state and federal grant programs, principal among which are Community Development and Section 8 Housing. These programs are subject to program compliance audits by the grantors or their representatives. The audits of these programs are an on-going process and many have not yet been conducted or completed. Accordingly, the City's compliance with applicable grant requirements will be established at a future date. Except as discussed in the following paragraphs, the amount, if any, of expenditures which may be disallowed by the granting agencies cannot be determined at this time, although the City believes that such amounts, if any, will be immaterial (See "Discussion of Financial Matters," Independent Audits herein).

Regulatory Matters. As of a result of inquiry conducted by the U.S. Securities and Exchange Commission (the "Commission"), the Commission found that the City violated federal securities laws in the offer and sale of

municipal securities issued in December 1995 and February 1996. All of the securities in question were paid in full in accordance with their terms. Nonetheless, the Commission found that "the City materially misrepresented its financial condition and results of operations and described certain summary financial information as audited without disclosing that some of this information was derived from financial statements upon which auditors had issued reports containing qualified opinions. These actions were taken knowingly or recklessly, within the meaning of those terms under the federal securities laws."

The City made an offer of settlement, which did not admit or deny the Commission's findings and acquiesced to the issuance of a cease-and-desist order by the Commission. On September 30, 1997, the Commission issued an Order Instituting Cease and Desist Proceedings, Making Findings and Issuing Cease-and-Desist Orders. No fines or penalties were assessed against the City. Pursuant to the Orders, the City must cease and desist from committing or causing any violation, and any future violation, of Section 17(a) of the Securities Act of 1933 and Section 10(b) of the Exchange Act of 1934 and Rules 10b-5 thereunder. Prior to the issuance of the Orders, however, the City had taken measures to enhance its ability to produce reliable financial information, including the hiring of an outside auditor to produce audits of its financial statements. The Commission stated in the Orders that "in determining to accept the offers, the Commission considered remedial acts promptly undertaken by the City and cooperation afforded to the Commission's staff."

City officials do not expect any further action by the Commission in this or any other matter concerning the City.

TAX MATTERS

In the opinion of Trespasz & Marquardt, LLP ("Bond Counsel"), based upon an analysis of existing laws, regulations, rulings, and court decisions, and assuming, among other matters, compliance with certain covenants, interest on the Bonds is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"). In the further opinion of Bond Counsel, interest on the Bonds is not a specific preference item for purposes of the alternative minimum income tax imposed under the Code with respect to individuals. A copy of the proposed form of the opinions of Bond Counsel are set forth in Appendix D hereto.

General Matters. The Code imposes various restrictions, conditions and requirements relating to the exclusion from gross income for federal income tax purposes of interest on obligations such as the Bonds. The City has covenanted to comply with certain restrictions designed to insure that interest on the Bonds and Notes will not be included in federal gross income. Failure to comply with these covenants will result in interest on the Bonds being included in gross income for federal income tax purposes as well as adjusted gross income for purposes of personal income taxes imposed by the State or the City of New York, from the date of original issuance of the Bonds. The opinion of Bond Counsel assumes compliance with these covenants. Bond Counsel has not undertaken to determine (or to inform any person) whether any actions taken (or not taken) or events occurring (or not occurring) after the date of issuance of the Bonds may adversely affect the value of, or the tax status of interest on, the Bonds. Further, no assurance can be given that pending or future legislation or amendments to the Code, if enacted into law, or any proposed legislation or amendments to the Code, will not adversely affect the value of, or the tax status of interest on, the Bonds.

Although Bond Counsel is of the opinion that interest on the Bonds is excluded from gross income for federal income tax purposes, except as noted hereinabove, and is excluded from adjusted gross income for income taxes imposed by the State and the City of New York, the ownership or disposition of, or the accrual or receipt of interest on, the Bonds may otherwise affect an Owner's federal or State tax liability. The nature and extent of these other tax consequences will depend upon the particular tax status of the Owner or the Owner's other items of income or deduction. Bond Counsel expresses no opinion regarding any such other tax consequences.

Miscellaneous. Tax legislation, administrative action taken by tax authorities, and court decisions, whether at the federal or state level, may adversely affect the tax-exempt status of interest on the Bonds under Federal or state law and could affect the market price or marketability of the Bonds.

Prospective purchasers of the Bonds should consult their own tax advisors regarding the foregoing matters.

Tax Accounting Treatment of Premium on Certain Bonds

The purchase price of certain Bonds (the "Premium Obligations") paid by an owner may be greater than the amount payable on such Bonds at maturity. An amount equal to the excess of a purchaser's tax basis in a Premium Obligation over the amount payable at maturity constitutes premium to such purchaser. The basis for federal income tax purposes of a Premium Obligation in the hands of such purchaser must be reduced each year by the amortizable bond premium, although no federal income tax deduction is allowed as a result of such reduction in basis for amortizable bond premium. Such reduction in basis will increase the amount of any gain (or decrease the amount of any loss) to be recognized for federal income tax purposes upon a sale or other taxable disposition of a Premium Obligation. The amount of premium which is amortizable each year by a purchaser is determined by using such purchaser's yield to maturity. Purchasers of the Premium Obligations should consult with their own tax advisors with respect to the determination of amortizable bond premium on Premium Obligations for federal income tax purposes and with respect to the state and local tax consequences of owning and disposing of Premium Obligations.

Notice 94-84, 1994-2 C.B. 559, states that the IRS is studying whether the stated interest portion of the payment at maturity on a short-term debt obligation (such as the Bonds), that matures not more than one year from the date of issue, bears a stated fixed rate of interest and is described in Section 103(a) of the Code, is (i) qualified stated interest that is excluded from the stated redemption price at maturity of the obligation (within the meaning of Section 1273 of the Code) but is excluded from gross income pursuant to Section 103(a) of the Code, or (ii) is not qualified stated interest and, therefore, is included by the taxpayer in the stated redemption price at maturity of the obligation, creating or increasing (as to that taxpayer) original issue discount on the obligation that is excluded from gross income pursuant to Section 103(a) of the Code. Notice 94-84 states that until the IRS provides further guidance with respect to tax-exempt short-term debt obligations, a taxpayer holding such obligations may treat the stated interest payable at maturity either as qualified stated interest or as included in the stated redemption price at maturity of the obligation. However, the taxpayer must treat the amounts to be paid at maturity on all tax-exempt short-term debt obligations in a consistent manner. Notice 94-84 does not address various aspects necessary to the application of the latter method (including, for example, the treatment of a holder acquiring its Note other than in the original public offering or at a price other than the original offering price). Each person considering acquiring the Bonds should consult its own tax advisor with respect to the tax consequences of ownership of and of the election between the choices of treatment of the stated interest payable at maturity on the Bonds.

LEGAL MATTERS

Legal matters incident to the authorization, issuance and sale of the Bonds are subject to the approving legal opinions of Trespasz & Marquardt, LLP, Syracuse, New York, Bond Counsel to the City. Bond Counsel's opinions will be in substantially the forms attached hereto as Appendix D.

DISCLOSURE UNDERTAKING

This Official Statement is in a form "deemed final" by the City for the purposes of Securities and Exchange Commission Rule 15c2-12 (the "Rule"). At the time of the delivery of the Bonds, the City will provide an executed copy of its undertaking to provide continuing disclosure certificate (the "Undertaking"). Said Undertaking will constitute a written agreement or contract of the City for the benefit of holders of and owners of beneficial interests in the Bonds. In accordance with the requirements of Rule 15c2-12, as the same may be amended or officially interpreted from time to time (the "Rule"), promulgated by the Securities and Exchange Commission (the "Commission"), the City has agreed to provide, or cause to be provided,

(1) to the Electronic Municipal Market Access ("EMMA") system of the Municipal Securities Rulemaking Board ("MSRB") or any other entity designated or authorized by the Commission to receive reports pursuant to the Rule, during each fiscal year in which the Bonds are outstanding, (i) certain annual financial information and operating data for the preceding fiscal year in a form generally consistent with the information contained or cross-referenced in the final Official Statement anticipated to be dated June 9, 2020 of the City relating to the Bonds under

the headings "Litigation" and in Appendix A under the headings "The City", "Financial Factors", "Real Property Taxes", "City Indebtedness" and "Economic and Demographic Data" and in Appendix B by the end of the sixth month following the end of each succeeding fiscal year, commencing with the fiscal year ended June 30, 2020, and (ii) a copy of the audited financial statement, if any, (prepared in accordance with accounting principles generally accepted in the United States of America in effect at the time of the audit) for the preceding fiscal year, commencing with the fiscal year ended June 30, 2020; such audit (prepared in accordance with the accounting principles the City may be required to employ pursuant to State law or regulation), if any, will be so provided on or prior to the later of either the end of the sixth month of each such succeeding fiscal year or, if an audited financial statement is not available at that time, within sixty days following receipt by the City of its audited financial statement for the preceding fiscal year, but, in any event, not later than the last business day of each such succeeding fiscal year; and provided further, in the event that the audited financial statement for any fiscal year is not available by the end of the sixth month following the end of any such succeeding fiscal year, unaudited financial statements in the form provided to the State, if available, will be provided no later than said date; provided however, that provision of unaudited financial statements in any year shall be further conditioned upon a determination by the City of whether such provision is compliant with the requirements of federal securities laws including Rule 10b-5 of the Securities Exchange Act of 1934 and Rule 17(a)(2) of the Securities Act of 1933;

- (2) timely notice, not in excess of ten (10) business days after the occurrence of such event, of the occurrence of any of the following events:
- (i) principal and interest payment delinquencies; (ii) non-payment related defaults, if material; (iii) unscheduled draws on debt service reserves reflecting financial difficulties; (iv) unscheduled draws on credit enhancements reflecting financial difficulties; (v) substitution of credit or liquidity providers, or their failure to perform; (vi) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices of determinations with respect to the tax status of the Bonds, or other material events affecting the tax status of the Bonds; (vii) modifications to rights of Bondholders, if material; (viii) Bond calls, if material, and tender offers; (ix) defeasances; (x) release, substitution, or sale of property securing repayment of the Bonds, if material; (xi) rating changes; (xii) bankruptcy, insolvency, receivership or similar event of the City; (xiii) the consummation of a merger, consolidation, or acquisition involving the City or the sale of all or substantially all of the assets of the City, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material; (xiv) appointment of a successor or additional trustee or the change of name of a trustee, if material; (xv) incurrence of a "financial obligation" (as defined in the Rule) of the City, if material, or agreement to covenants, events of default, remedies, priority rights or other similar terms of a financial obligation of the Issuer, any of which affect bondholders, if material; and (xvi) default, event of acceleration, termination event, modification of terms or other similar events under a financial obligation of the City, if any such event reflects financial difficulties.

Event (iii) is included pursuant to a letter for the SEC staff to the National Association of Bond Lawyers dated September 19, 1995. However, event (iii) is not applicable, since no "debt service reserves" will be established for the Bonds.

With respect to event (iv) the City does not undertake to provide any notice with respect to credit enhancement added after the primary offering of the Bonds.

With respect to event (xii) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the City in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or government authority has assumed jurisdiction over substantially all of the assets or business of the City, or if such jurisdiction has been assumed by leaving the existing governing body and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the City.

The City may provide notice of the occurrence of certain other events, in addition to those listed above, if it determines that any such other event is material with respect to the Bonds; but the City does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above; and

(3) in a timely manner, notice of a failure to provide the annual financial information and operating data and such audited financial statement by the date specified.

The City's Undertaking shall remain in full force and effect until such time as the principal of, redemption premiums, if any, and interest on the Bonds shall have been paid in full or in the event that those portions of the Securities and Exchange Commission Rule 15c2-12 ("Rule 15c2-12") which require the Undertaking, or such provision, as the case may be, do not or no longer apply to the Bonds. The sole and exclusive remedy for breach or default under the Undertaking is an action to compel specific performance of the undertakings of the City, and no person or entity, including a Holder of the Bonds, shall be entitled to recover monetary damages thereunder under any circumstances. Any failure by the City to comply with the Undertaking will not constitute a default with respect to the Bonds.

The City reserves the right to amend or modify the Undertaking under certain circumstances set forth therein; provided that any such amendment or modification will be done in consultation with nationally recognized bond counsel in a manner consistent with Rule 15c2-12, as amended.

Compliance History

The City was 2 days late in filing a material event for bond call and defeasance in a timely manner in connection with a 2017 bond refunding. The notice of the late filing was posted on January 11, 2018.

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC, Orchard Park, New York, (the "Municipal Advisor") is an independent municipal advisor registered with the United States Securities and Exchange Commission and the Municipal Securities Rulemaking Board. The Municipal Advisor has served as the independent financial advisor to the City in connection with this transaction.

In preparing the Official Statement, the Municipal Advisor has relied upon governmental officials, and other sources, who have access to relevant data to provide accurate information for the Official Statement. The Municipal Advisor has not been engaged, nor has it undertaken, to independently verify the accuracy of such information. The Municipal Advisor is not a public accounting firm and has not been engaged by the City to compile, review, examine or audit any information in the Official Statement in accordance with accounting standards. The Municipal Advisor is not a law firm and does not provide legal advice with respect to this or any debt offerings of the City. The Municipal Advisor is an independent advisory firm and is not engaged in the business of underwriting, trading or distributing municipal securities or other public securities and therefore will not participate in the underwriting of the Bonds.

RATINGS

Moody's Investors Service ("Moody's") and S&P Global Ratings ("S&P") have assigned ratings of "A1" and "A+", respectively, to the uninsured long term debt of the City, including the Bonds.

Such ratings reflect only the views of the respective organizations and any desired explanation of the significance of these ratings should be obtained from Moody's and S& at their respective addresses: Moody's Investor Service, 7 World Trade Center at Greenwich Street, New York, New York 10007 and S&P Global Ratings, 55 Water Street, New York, NY 10041. There can be no assurance that the ratings will continue for any specified period of time or that such ratings will not be revised or withdrawn, if, in the judgment of Moody's or S&P, circumstances so warrant. Any change or withdrawal of a rating may have an adverse effect on the market price of the Bonds or the availability of a secondary market for the Bonds.

CYBERSECURITY

The City, like many other public and private entities, relies on technology to conduct its operations. As a recipient and provider of personal, private, or sensitive information, the City faces multiple cyber threats including, but not

limited to, hacking, viruses, malware, ransomware and other attacks on computer and other sensitive digital networks and systems. To mitigate the risk of business operations impact and/or damage from cyber incidents or cyber-attacks, the City invests in various forms of cyber security and operational controls; however, no assurances can be given that such security and operational control measures will be completely successful to guard against cyber threats and attacks. The results of any such attack could impact business operations and/or damage City digital networks and systems and the costs of remedying any such damage could be substantial.

In July 2019, the Syracuse City School District experienced a cyber-attack which resulted in certain computer files and systems becoming temporarily inoperable. As a result of the attack, the School District has incurred and will continue to incur significant costs to restore operability of its systems and conduct an investigation. Although the School District expects to be able to offset a significant portion of the costs incurred through its liability insurance policy, the incident remains under investigation and the School District may incur future costs related to this incident that cannot be predicted at this time and may not be covered by such insurance, including, but not limited to, costs related to enhancements to its security infrastructure. Further, the School District could incur future liabilities related to this incident, and the incident may negatively impact the School District's ability to obtain insurance coverage in the future. Despite steps taken to prevent a similar incident in the future, the School District cannot provide assurances that such enhancements will be completely successful, and any future attacks could materially impact the School District's operations and financial condition. At this time the District has fully restored its student management and financial operating systems.

ADDITIONAL INFORMATION

Additional information may be obtained from Brad O'Connor, Commissioner of Finance, 128 City Hall, Syracuse, New York 13202, (315) 448-8310, e-mail: BO'Connor@syrgov.net, or from the City's Municipal Advisor, Capital Markets Advisors LLC, 4211 North Buffalo Street - Suite 19, Orchard Park, New York 14127, (716) 662-3910.

Any statements in this Official Statement involving matters of opinion or estimates, whether or not expressly so stated, are intended as such and not as representations of fact. No representation is made that any of such statements will be realized. This Official Statement is not to be construed as a contract or agreement between the City and the original purchasers or holders of any of the Bonds.

Capital Markets Advisors, LLC may place a copy of this Official Statement on its website at www.capmark.org. Unless this Official Statement specifically indicates otherwise, no statement on such website is included by specific reference or constitutes a part of this Official Statement. Capital Markets Advisors, LLC has prepared such website information for convenience, but no decisions should be made in reliance upon that information. Typographical or other errors may have occurred in converting original source documents to digital format, and neither the City nor Capital Markets Advisors, LLC assumes any liability or responsibility for errors or omissions on such website. Further, Capital Markets Advisors, LLC and the City disclaim any duty or obligation either to update or to maintain that information or any responsibility or liability for any damages caused by viruses in the electronic files on the website. Capital Markets Advisors, LLC and the City also assume no liability or responsibility for any errors or omissions or for any updates to dated website information.

Estimates and Forecasts. The statements contained in this Official Statement and the appendices hereto that are not purely historical are forward-looking statements. Such forward-looking statements can be identified, in some cases, by terminology such as "may," "will," "should," "expects," "intends," "plans," "anticipates," "believes," "estimates," "predicts," "potential," "illustrate," "example," and "continue," or the singular, plural, negative or other derivations of these or other comparable terms. Readers should not place undue reliance on forward-looking statements. All forward-looking statements included in this Official Statement are based on information available to such parties on the date of this Official Statement, and the City assumes no obligation to update any such forward-looking statements. The forward-looking statements included herein are necessarily based on various assumptions and estimates and are inherently subject to various risks and uncertainties, including, but not limited to, risks and uncertainties relating to the possible invalidity of the underlying assumptions and estimates and possible changes or developments in various important factors. Accordingly, actual results may vary from the projections, forecasts and estimates contained in this Official Statement and such variations may be material.

This Official Statement is submitted only in connection with the sale of the Bonds by the City and may not be reproduced or used in whole or in part for any other purpose.

> CITY OF SYRACUSE ONONDAGA COUNTY, NEW YORK

By: <u>/s/ Brad O'Connor, CPA</u>
Commissioner of Finance and Chief Fiscal Officer

DATED: June 13, 2022

THE CITY

There follows in this Official Statement a brief description of the City, together with certain information concerning its governmental organization, finances, indebtedness and economy.

General Information

The City is a municipal corporation and the fifth largest city in the State. The City encompasses a land area of 26 square miles in the north central portion of the State near Lake Ontario. According to 2020 U.S. Census information, the City's population as for 2020 was estimated at 148,620 (an increase of 3,450 persons, or 2.32%, since the 2010 Census). The City is the major component in the Syracuse Metropolitan Statistical Area ("MSA") which had a total estimated population of 738,305 as of 2020 according to the U.S. Census information. See "Economic and Demographic Data - Population Trends," herein.

The City is a major regional center for industrial, commercial and financial activities. The City is home to Syracuse University and LeMoyne College as well as various other educational institutions. An extensive transportation network contributed to growth and development of the City. Interstate 90 (East-West) and 81 (North-South) intersect near the City. Air transportation is available at the Hancock International Airport which is owned by the City and operated by the Syracuse Regional Airport Authority ("SRAA") (see "The Syracuse Hancock International Airport," herein). Railway services are provided by CSX Corporation, who operates a major freight yard just east of the City, and a Great Lakes deep-water port is located 30 miles away.

A diverse economy has allowed the Syracuse MSA to withstand changing job markets and remain relatively stable over time. According to 2021 labor data from the New York State Labor Department, production of goods makes up 12% of the job mix, including manufacturing (8%). Private services—including trade, transportation, and utilities; finance; education and health; professional and business; and leisure/hospitality— made up 69%. Government makes up 19% of the total jobs in the MSA. SUNY Upstate Medical University and St. Joseph's Hospital Health Center are the largest employers in the area and employ 7,275 and 4,781 persons, respectively. In addition, sixteen other organizations have 1,000 employees or more.

The City has a redevelopment program which is designed to rehabilitate and improve its housing stock and to revitalize the economic environment of the City. This activity is administered and coordinated by the City's Department of Neighborhood and Business Development. The revitalization of the downtown and adjacent areas has been the primary focus of redevelopment efforts to date. Since 2010, more than \$650M has been invested in downtown Syracuse, with more than 500 new residential apartments resulting in an increase in downtown residency by 77%. Job creation and retention in the entire City has been a prime objective as well. Over the past 10 years, the Syracuse MSA has seen a steady decline in unemployment according to the US Bureau of Labor Statistics. In January of 2011, the MSA had an unemployment rate of 9.3%, which consistently declined to around 5% just prior to the COVID-19 pandemic in March 2020.

Form of Government

The Common Council is the legislative body of the City and consists of a Council President, four members elected atlarge to serve four-year terms and five district members elected to serve two-year terms. Pursuant to the City's Charter, the President and all councilors-at-large may serve no more than two consecutive terms. District councilors are limited to four consecutive two-year terms. It is the responsibility of the Common Council to approve all legislation, including ordinances and local laws, adopt and modify as required the City's operating and capital budgets, levy real property taxes and authorize the issuance of all indebtedness.

The Mayor is elected at a general election to serve a four-year term and may succeed for one additional term. The current Mayor was elected in November 2017, began his first four-year term on January 1, 2018 and was reelected to an additional four-year term beginning January 1, 2022. According to the City Charter, the Mayor is the Chief Executive Officer of the City and appoints all department heads (except the City Auditor, who is elected) to serve at his pleasure. The Mayor is responsible for the day-to-day operations of the City government. The Mayor may advise the Council on various matters, attend meetings of this body and express his views at such times. Although the Mayor does not have a vote on the Common Council, the Charter does provide the Mayor with veto authority over local laws and ordinances. The Common Council may override a mayoral veto subject to the terms and conditions specified in the Charter.

The City Auditor is elected at-large to serve a four-year term with a limit of two consecutive terms. Pursuant to the City Charter, the Auditor annually examines the records and transactions of every officer, department and board of the City including the Board of Education and the Syracuse Housing Authority.

The City Clerk is appointed by the Common Council to serve a two-year term. The Clerk maintains the minutes of the proceedings of the Common Council and a record of all ordinances enacted by the Council and approved by the Mayor. Other duties of this office include issuing various licenses and permits as provided by law.

The Commissioner of Finance is appointed by the Mayor and functions as the Chief Fiscal Officer of the City and School District. It is the duty of the Commissioner of Finance to collect all taxes and assessments levied against City properties. Accounting records are maintained by the Commissioner of Finance who also prepares the annual financial statements of the City. The Commissioner of Finance invests funds and manages the debt program.

The School District is governed by an independently elected seven-member Board of Education. Members are elected at-large to serve four-year terms; there is no restriction as to the number of terms that may be served. The Board of Education is responsible for managing the school system in accordance with the provisions of the State Education Law. A Superintendent of Schools is appointed by the Board of Education to administer policy and supervise the day-to-day activities of the School District. The School District prepares its own financial statements, which are audited separately from the financial statements of the City (the City and School District utilize the same independent auditors); however, the School District is included as a component unit in the City's financial statements.

Services

The City is responsible for providing most municipal services to its residents including: (1) water; (2) sewage collection; (3) refuse collection; (4) police and fire protection; (5) street maintenance and (6) recreational facilities. The City owns and operates, in conjunction with the SRAA (the "SRAA"), the Syracuse Hancock International Airport, which is located north of the City on U.S. Interstate 81. The City water supply system is augmented through its participation in a County water district. Sewage treatment is provided by the County. By law, the County provides various economic assistance and health services to City residents. Public libraries in the City are run by the County.

Education. Public education is the responsibility of the Board of Education which is independently elected but does not have the power to raise taxes and issue debt. For taxation and debt issuance, the School District is dependent upon the City. The Common Council of the City approves the budget of the School District but does not otherwise control the budget of the School District. Student enrollment for the 2021-22fiscal year was 19,806 (grades K – 12). The School District operates 41 buildings, including 34 school buildings, and currently employs approximately 5,326

persons in full and part-time capacities, with 4,444 of these individuals represented through a collective bargaining unit (see "Employees," herein).

Joint Schools Construction Board - Phase I. The Syracuse Schools Act was enacted and became legally effective April 1, 2006, authorizing Phase I of a comprehensive redevelopment program (the "Program") for public school buildings of the City School District of the City of Syracuse (the "SCSD"), at a cost not to exceed \$225 million. The Program was adopted by the Syracuse Joint Schools Construction Board (the "JSCB") on February 28, 2008, amended on April 17, 2009 and approved by the Office of the State Comptroller on June 24, 2009 in accordance with §6 of the Syracuse Schools Act. Prior to the commencement of the Program, the facilities of the SCSD had not been updated or improved in a number of years. The Syracuse Schools Act was enacted to encourage the City and the SCSD to cooperatively undertake new and innovative ways of renovating, rehabilitating and financing public schools within the City. The plans and specifications for the Program were developed by the JSCB, which is acting on behalf of the City and the SCSD, pursuant to the aforementioned Syracuse Schools Act and an inter-municipal agreement dated April 1, 2004, which is further detailed below. Pursuant to the Syracuse Schools Act, the JSCB has been authorized to manage the design, reconstruction, and financing of the rehabilitation of existing public school facilities in the City, and to coordinate efforts for compliance with, the monitoring of, and the reporting on, a program-wide diversity plan for the Program. The JSCB retained the Gilbane Building Company, a privately held family run construction company founded in 1873 in Providence, Rhode Island, to be the independent program/construction management firm for Phase I of the Program, and to assist in the management of Phase I of the Program under the supervision of the City Engineer. The JSCB is comprised of seven (7) Board Members, consisting of: the Mayor, the Superintendent of the SCSD, three (3) additional members appointed by the Mayor, and two (2) additional members appointed by the Superintendent of the SCSD.

A comprehensive plan identifying projects at the school buildings listed in the Act was prepared for the JSCB's consideration. Upon approval of the plan by the JSCB, the plan, which provided for approximately \$180.0 million of improvements, was submitted to the State Comptroller for review and approval, which approval was granted on January 25, 2008. Upon the recommendation of the Program Manager hired by JSCB to oversee the building improvements, the original plan was revaluated and modified to reduce the scope for certain buildings. A revised financial plan based on a total estimated cost of \$145.0 million was submitted to the State Comptroller in April 2009. The State Comptroller approved the new financial plan on June 24, 2009.

The Act provides for various financing structures and methods of obtaining project financing. The JSCB can use general obligations. Other financing options available include the use of certificates of participation or installment debt contracts. In addition, the JSCB can elect to utilize Syracuse Industrial Development Agency ("SIDA") or the State Municipal Bond Bank ("MBB") to finance its projects. In the event JSCB chooses to finance through SIDA, it must submit an analysis to the MBB demonstrating that a SIDA financing would be more cost effective than a MBB based financing. State aid reimbursements will be based, in part, on the lowest obtainable interest rate which may be a SIDA or MBB actual rate or an estimated rate provided by MBB in the event the JSCB elects to finance through SIDA. The Act contains State aid intercept provisions similar to the State Finance Law, Section 99-b, in the event the School District defaults on the payment of principal or interest incurred on obligations issued pursuant to the Act.

The American Recovery and Reinvestment Act of 2009 (the "Recovery Act") amended the Internal Revenue Code (the "Code"), authorizing Qualified School Construction Bonds ("QSCBs") to provide financing for the construction, rehabilitation or repair of public school facilities, or the acquisition of land on which such facilities are to be constructed with the proceeds of such bonds, or for expenditures for costs of acquisition of equipment to be used in such portion or portions of the public school facility that is being constructed, rehabilitated or repaired with the proceeds of such bonds. Section 54F of the Code provides a national bond limitation authorization for QSCBs of \$11 billion for each of the calendar years 2009 and 2010 (which may be carried forward). Pursuant to Notice 20 10-17 issued by the Internal Revenue Service, the State of New York was allocated \$178,782,000 of the 2010 national bond limitation for QSCBs. The State Education Department has assigned a portion of New York's 2010 QSCB allocation to the City School District in the amount of \$15,000,000 for purposes of issuing QSCBs (the "District's QSCBs"). Such funds were issued on July 12, 2011 through SIDA and the JSCB.

Payment of the subsidy may be offset against amounts that may be owed to the United States or its agencies by the District. Also, it is possible that the subsidy payments could be reduced or discontinued or that the timing of their receipt could be changed as a result of changes in the federal law.

Phase I included extensive renovations to four SCSD school buildings (Central Tech, Fowler, HW Smith and Dr. Weeks), and minor renovations at two other SCSD buildings (Clary and Bellevue Academy at Shea). The JSCB has closed all Phase I projects.

Further details regarding the JSCB and Phase I of the project can be obtained by visiting the JSCB official website: http://www.syrgov.net/JSCB.

Joint Schools Construction Board – **Phase II.** Legislation authorizing Phase II of the Program at a cost not to exceed \$300 million was enacted on October 25, 2013. Legislation was subsequently enacted on March 17, 2014 specifying 15 buildings to be included in Phase II. The Phase II Comprehensive Plan was adopted by the JSCB on January 29, 2015, amended on July 27, 2017 and approved by the Office of the State Comptroller on January 12, 2018. The Phase II plan was further amended and adopted on September 26, 2019 and approved by the Office of the State Comptroller on January 14, 2020 in accordance with §6 of the Syracuse Schools Act. Such legislation authorized the City to provide interim financing for project costs from the proceeds of City obligations issued in anticipation of permanent financing from any source provided under the Syracuse Schools Act, and the reimbursement to the City for the payment of such obligations from any such source (including permanent financing issued through the Issuer for such purpose).

In March 2018, June 2018 April 2019 and March 2020, \$67,265,000, \$38,500,000, \$65,435,000 and \$80,530,000 were issued pursuant to Phase II legislation, respectively.

There are currently twelve Phase II projects under different phases of construction: Bellevue, Blodgett, Ed Smith, Grant, PSLA@ Fowler, Huntington, Corcoran, Nottingham, Clary, Danforth, Expeditionary Learning and Henninger. Construction for all projects is expected to be complete by September of 2022.

The JSCB selected Turner Construction Company as the Program Manager for Phase II of the Program on August 28, 2015. Turner Construction was founded 113 years ago and is a North America-based, international construction services company. With a staff of over 5,200 employees, the company completes \$10 billion of construction on 1,500 projects each year.

A full copy of the phase II legislation may be obtained by visiting the website of the New York State Assembly (http://assembly.state.ny.us/), or by contacting the City's Municipal Advisor. In addition, further details regarding the JSCB and the status of Phase II of the project can be obtained by visiting the JSCB website: http://www.syrgov.net/JSCB. Further details regarding the JSCB Phase II financing can be obtained by contacting the City's Municipal Advisor.

Joint Schools Construction Board – **Phase III.** Legislation authorizing Phase III of the Program at a cost not to exceed \$300 million was enacted on November 15, 2021. Work on Phase III is expected to commence in the 2023 calendar year.

Solid Waste. The City has an agreement with the Onondaga County Resource Recovery Agency ("OCRRA"), a public benefit corporation, to deliver solid waste for disposal. On March 4, 2015 the City Council authorized a twenty-year delivery agreement with the OCRRA to replace a twenty-five-year delivery agreement which had recently expired. Residential waste, which is collected by the City, and commercial waste, collected by private carters, are subject to the agreement.

The OCRRA program for solid waste disposal consists of elements: incineration at the resource recovery plant, recycling and landfills. The resource recovery plant began operating in 1995. In accordance with State mandates, OCRRA instituted a recycling program in 1990. OCRRA utilizes landfills for non-burnable waste and for disposing of the ash residue from the plant.

OCRRA has no taxing power and presently derives its revenues from tipping fees and energy sales, which support its services, including recycling, disposal and other programs. The solid waste delivered to OCRRA is based upon intermunicipal agreements among the County (the County subsequently assigned its agreements to OCRRA) and its municipal subdivisions (excluding one town and one village in that town). The intermunicipal agreements obligate the municipalities to deliver all of the solid waste collected within their boundaries to OCRRA's disposal facilities. On March 4, 2015 the City Council authorized a twenty-year delivery agreement with the OCRRA. Pursuant to the

terms of the inter-municipal agreements, municipalities must license private haulers collecting solid waste in the municipality. The licenses issued to private haulers provide that all solid waste collected in the licensing municipality must be delivered to OCRRA facilities. Over the last several years, court decisions and the increasing availability of landfill capacity have led to uncertainty in the solid waste industry, creating the possibility of challenges to the validity of the delivery agreements. However, OCRRA and the County believe that OCRRA's delivery agreements with the 33 participating municipalities will likely remain valid and enforceable even in the wake of the 1994 Carbone v. The Town of Clarkstown, NY decision invalidating certain municipal flow control ordinances. The County has agreed to cooperate with OCRRA to enforce the delivery agreements, if necessary. The County is also working cooperatively with OCRRA and the municipalities to develop a plan which will ensure the continued and long-term viability of OCRRA. Among the steps already taken is the authorization by the County and OCRRA for the defense and indemnification of participating municipalities that enact approved, in-state waste site designation laws. These laws, adopted by all thirty-three member municipalities, are designed to commit disposal of the municipalities' solid waste to the most environmentally sound available disposal site, if the waste is to be disposed of within the State. The OCRRA waste-to-energy site has been chosen as the designated site for such in-state disposal. In order to further support the solid waste disposal system in the County, the County Legislature in 2003 enacted a local law based largely on a Federal Court of Appeals decision involving the nearby Oneida-Herkimer Waste Authority, which had a local law directing that all solid waste, except construction and demolition and recyclables, be disposed of at the OCRRA waste-to-energy facility. The County's local law applies to 33 of the 35 municipalities in the County, including the City. The validity of the Oneida-Herkimer local law was challenged by certain waste haulers but upheld on February 16, 2006 by the Federal Second Court of Appeals which found that the law did not place an undue burden on interstate commerce and dismissed the suit. Since 1992, several additional towns have created residential waste districts, joining the City and several populous towns and villages, which have implemented either municipal collection or municipally contracted collection of residential municipal solid waste. As a result, the majority of residential waste in the County is now under municipal or municipally contracted control, all of which is directed to the OCRRA system for disposal. Residential waste in the County makes up approximately one-half of the total solid waste stream.

The City first entered into a five-year pricing contract with OCRRA effective on January 1, 2006. Similar contracts were signed by OCRRA with each of the municipal and commercial haulers that use OCRRA'S facilities. Under the terms of the City's most recent contract, which was signed in December, 2020, the City will pay solid waste tipping fees of \$100 per ton. In addition, OCRRA has agreed to discount the foregoing price schedule by \$4 per ton for prompt payments, which results in a net tipping fee of \$96 per ton. The pricing contracts are considered to be current market prices and, therefore, in effect provide OCRRA with "economic" flow control, thereby addressing the uncertainties created by the loss of "legal" flow control as a result of the U. S. Supreme Court's decision in the Carbone case (See above). The current contract has automatic renewals through the 2035 calendar year.

Other Entities. City residents also receive various services from the following independent authorities: the Syracuse Housing Authority, the Onondaga County Water Authority, the Central New York Regional Transportation Authority and the Central New York Regional Market Authority.

Employees

The School District employs approximately 5,326 persons in full and part-time capacities, with 4,444 of these individuals represented through a collective bargaining unit. There follows a listing of the various collective bargaining units which represent City and School District employees, the current membership of each unit and expiration date of the contract presently in effect. Six employee contracts have expired and are currently in negotiations. See "Budgetary Matters" herein for a discussion of the City's provisions to pay wage and benefit increases.

Bargaining Unit	Membership	Contract Expiration Date	
City Employees:			
School Crossing Guards, Local 834 CSEA Middle Management Local 3952,	66	06-30-21	(2)
AFSCME, Council 66	32	12-31-20	(2)
Civil Service Employees' Assoc.	201	12-31-20	(2)
American Federation of State, City and			
Municipal Employees – Local 400	342	12-31-25	
American Federation of State, City and			
Municipal Employees – Local 1773	42	12-31-20	(2)
Police Benevolent Association	383	12-31-22	(1)
Deputy Chiefs of Fire - International			
Association of Firefighters – Local 280	5	12-31-20	(2)
International Association of			
Firefighters – Local 280	358	12-31-25	
Syracuse Building Trades Council	33	12-31-20	(2)
School District Employees:	1,462		
1 7			
Unit #1 Syracuse Teachers Association	2,483	06-30-24	
Unit #2 Syracuse Adm. & Super.	149	06-30-19	(1)
Unit #3 Management Confidential	36	06-30-24	
Unit #5 Maintenance and Trades	39	06-30-19	(1)
Unit #6 Custodial	242	06-30-20	(1)
Unit #7 Food Service Operators	207	06-30-24	
Unit #8 Assistants & Attendants	833	06-30-24	
Unit #9 Clerical Employees	283	06-30-25	
Unit #10 Health Services	93	06-30-24	443
Unit #11 Cafeteria Mgrs., Non-Cert. Supers.	76	06-30-19	(1)
Unit #12 Native American Studies	3	06-30-24	
	4,444		
Total Membership City and School District	5,906		

The City Office of Personnel and Labor Relations and the Office of the Chief Financial Officer of the City School District. Source:

In negotiation. Expired, negotiations have not yet commenced.

Employee Benefits

State and Local Employees' Retirement System State and Local Police and Fire Retirement System State Teachers' Retirement System

Retirement Benefits

General Information. The City (including the City School District) participates in the State and Local Employees' Retirement System ("ERS"), the State and Local Police and Fire Retirement System ("PFRS") and the State Teachers' Retirement System ("TRS"). Obligations of employers and employees to contribute and benefits to employees are governed by the New York State Retirement and Social Security Law ("NYSRSSL"). The systems offer a wide range of plans and benefits which are related to years of service and final average salary, vesting of retirement benefits, death and disability benefits and optional methods of benefit payments. All benefits generally vest after five years of credited service and are based on the projected unit credit method of valuation.

NYSRSSL provides that participating employers in each system are jointly and severally liable for any actuarial unfounded amounts. Such amounts are collected through annual billings to all participating employers (See below). Generally, all employees, except certain part-time employees, participate in the systems. All paid full-time police officers and firefighters are mandatory members. PFRS is a non-contributory system. ERS and TRS are generally noncontributory systems except that members with less than 10 years of credited service must contribute 3% of their salary for retirement benefits (however, see below for information on the recently implemented Tier V for new ERS members).

State Pension Reform. The State enacted pension reform legislation in 2003 and 2004, which changed the methods for determining contributions to ERS and PFRS by participating member employers such as the City and enacted certain other changes described herein.

Chapter 49 of the Laws of 2003 established minimum annual contributions to ERS and PFRS and modified the billing cycles to better match the budget cycles of participating members. The valuation date for ERS and PFRS was changed from April 1 in the year of contribution to April 1 of the second calendar year preceding the contribution due date. Employers now have better information for budgeting retirement costs as a result of the change in the valuation date. The legislation provided that minimum retirement contributions will be made by employers each year, including for those years in which favorable investment returns would permit lower contributions.

Chapter 260 of the Laws of 2004 changed the due date for ERS and PFRS contributions from December 15 to February 1, effective for contributions scheduled for payment on December 15, 2004 and thereafter. The period for amortizing excess contributions was increased from five years to ten years. ERS and PFRS contributions may be amortized through the State at market rates of interest determined by the State Comptroller. Alternatively, employers may issue taxable bonds to finance their eligible excess contributions. ERS and PFRS members may amortize contributions due in 2006 and 2007 if such contributions exceed 9.5% and 10.5% of payroll, respectively. City officials have indicated that all ERS and PFRS contributions which were eligible for amortization were paid in full.

Additionally, on March 16, 2012, the Governor signed into law the new Tier 6 pension program, effective for new ERS employees hired after April 1, 2012. The Tier 6 legislation provides, among other things, for increased employee contribution rates of between 3% and 6%, an increase in the retirement age from 62 years to 63 years, a readjustment of the pension multiplier, and a change in the time period for final average salary calculation from 3 years to 5 years. Tier 6 employees will vest in the system after ten years of employment and will continue to make employee pension contributions throughout employment.

Police officers and firefighters who are members of PFRS are divided into four tiers. As with ERS, retirement benefit plans available under PFRS are most liberal for Tier 1 employees. The plans adopted for PFRS employees are noncontributory for Tier 1 and Tier 2 employees. Police officers and firefighters that were hired between July 1, 2009 and January 8, 2010 are currently in Tier 3, which has a 3% employee contribution rate by members. There is no Tier 4 in PFRS. Police officers and firefighters hired after January 9, 2010 are in Tier 5 which also requires a 3% employee

contribution from members. Police officers and firefighters hired after April 1, 2012 are in Tier 6, which also originally had a 3% contribution requirement for members for FY 12-13; however, as of April 1, 2013, Tier 6 PFRS members are required to contribute a specific percentage of their annual salary, as follows, until retirement or until the member has reached 32 years of service credit, whichever occurs first: \$45,000.00 or less contributes 3%; \$45,000.01 to \$55,000.00 contributes 3.5%; \$55,000.01 to \$75,000.00 contributes 4.5%; \$75,000.01 to \$100,000.00 contributes 5.75%; and more than \$100,000.00 contributes 6%.

Beginning July 1, 2013, a voluntary defined contribution plan option was made available to all unrepresented employees of New York State public employers hired on or after that date, and who earn \$75,000 or more on an annual basis.

The New York State Retirement System allows municipalities to make employer contribution payments in December of each year, at a discount, or the following February, as required. The City opted to make its pension payments in December in order to take advantage of the discount. The most recent payment was made by the City in December 2019.

Due to significant capital market declines in 2008 and 2009, the State's Retirement System portfolio experienced negative investment performance and severe downward trends in market earnings. As a result of the foregoing, the employer contributions for the State's Retirement System continue to be higher than the minimum contribution rate established by Chapter 49. Legislation was enacted that permits local governments and school districts to borrow a portion of their required payments from the State pension plan at an interest rate of 5%. The legislation also requires those local governments and school districts that amortize their pension obligations pursuant to the regulation to establish reserve accounts to fund payment increases that are a result of fluctuations in pension plan performance. The City did not amortize contributions during the 2014-15 through the 2018-19 fiscal years and officials have indicated they do not anticipate amortizing payments in the foreseeable future. However, according to the most recent audit report, the total unpaid liability for the year ended June 30, 2018 was \$1,505,097 of which \$81,316 is reported in the proprietary funds/business-type activities and \$1,423,781 in the governmental activities (see page 70 of the audited financial statements for the fiscal year ended June 30, 2018).

In August 2021, the State Comptroller announced for Fiscal Year 2022-23, the average contribution rates for ERS will decrease from 16.2% to 11.6, and the average contribution rate for PFRS will decrease from 28.3% to 27.0%. Projections of required contributions will vary by employer depending on factors such as retirement plans, salaries and the distribution of their employees among the six retirement tiers. The employer contribution rates announced will apply to each employee's salary base during the period of April 1, 2021 through March 31, 2022. Payments based on those rates are due by February 1, 2023, but may be prepaid by December 15, 2022.

In Spring 2013, the State and ERS approved a Stable Contribution Option ("SCO"), which modified its existing SCO adopted in 2010, that gives municipalities the ability to better manage spikes in Actuarially Required Contribution rates ("ARCs"). The plan allows municipalities to pay the SCO amount in lieu of the ARC amount. The City pays its ERS and PFRS contributions on a pay as you go basis and does not expect to participate in the SCO in the foreseeable future.

Retirement System Billing Procedures

TRS. TRS contributions are paid as a reduction in State aid payments due September 15, October 15 and November 15 of the succeeding fiscal year. Any deficiency or excess in TRS contributions is settled on a current basis in the month of January.

ERS and PFRS. The City's contributions to ERS and PFRS are due on or before February 1. Such contributions are based on salary estimates for the fiscal year ending on March 31 of the next calendar year.

Retirement Contributions. The City adopted GASB Statement No. 68, Accounting and Financial Reporting for Pensions - an amendment of GASB Statement No. 27. Statement No. 68 establishes accounting and financial reporting requirements related to pensions for governments whose employees are provided with pensions through pension plans that are covered by the scope of Statement No. 68, as well as for non-employer governments that have a legal obligation to contribute to those plans. This statement required the addition of several lines to the City's government-

wide financial statements and a cumulative change in accounting principle adjustment to net position as shown in the audited financial statements for the fiscal year ended June 30, 2015.

The City also adopted GASB Statement No. 71, Pension Transitions for Contributions Made Subsequent to the Transition Date – an amendment of GASB Statement No. 68. The objective of this Statement is to address an issue regarding application of the transition provisions of Statement No. 68, Accounting and Financial Reporting for Pensions. The issue relates to amounts associated with contributions, if any, made by a state or local government employer or non-employer contributing entity to a defined benefit pension plan after the measurement date of the government's beginning net pension liability. This Statement required accounting for the impact of the payment the City made to the New York State Retirement Systems during the fiscal year on the City's portion of net pension asset from TRS.

For the years ended June 30, 2017 through 2021, and as budgeted for 2022 the City's contributions to the SRS are as follows:

Fiscal Year Ended June 30:	ERS (1)	PFRS	TRS ⁽²⁾
2017	\$11,565,327	\$18,918,275	\$25,004,761
2018	11,554,489	17,767,259	22,634,278
2019	10,415,400	17,160,178	18,028,006
2020	11,663,987	18,338,471	20,169,382
2021	11,869,962	18,038,055	17,250,303
2022 (Budgeted)	12,386,735	22,428,248	16,945,104

Includes City and School District contributions.

(1) (2) School District contributions for General Fund and Special Aid Funds.

The Audited Financial Statements, the Adopted Budget of the City and SCSD and City Officials.

Accounting for Retirement Costs. Effective for the fiscal year ended June 30, 2005, the City and School District changed the method of accounting for retirement costs from a cash basis to an accrual basis.

In connection with the conversion to full accrual accounting for retirement benefits, the School District received a \$5 million special apportionment of State aid provided to mitigate the effects of this change. The School District repaid the special apportionment of State aid in September 2005 and no further aid apportionments were required to make the transition to accrual accounting for retirement expenses.

Pursuant to Chapter 105 of the Laws of 2010, the State Legislature approved a temporary early retirement incentive program which employers may offer to members of ERS. The program was not extended to members of PFRS. Employers must adopt a local law (applicable to employers possessing this power) or a resolution on or before August 21, 2010 in order to participate in this program. A certified copy of the local law or resolution was required to be sent to ERS. On August 2, 2010 the City adopted a resolution which was subsequently sent to ERS. The incentive legislation requires that employers achieve a salary savings of 50% for employees electing the early retirement program.

The incentive program consists of two parts, Part A and Part B. Employers may offer both parts, however, employees are permitted to participate in only one of these parts. For Part A, employers must identify eligible titles and use seniority as a factor to determine employee eligibility. A list of eligible members must be provided to ERS. The open enrollment period for Part A is a minimum of 30 days and a maximum of 90 days, during which time electing members must submit a Service Retirement application stating the date of retirement. Such application must be filed with ERS 14 days prior to the effective retirement date. Part A provides eligible participants with one month of additional service credit up to a maximum of 36 months of credit. Employees must be 50 years of age on the effective retirement date, with 10 years of service credit or at least 55 years of age with five years of service, excluding any incentive credit, or otherwise eligible to retire. If an employee electing Part A retires prior to age 62 and less than 30 years of credited service (including the incentive and certain other provisions), a reduced benefit will apply.

Part B of the incentive program does not require employers to target classes of employees and the plan is open to members of tiers 2, 3 and 4 of ERS. The enrollment period for Part B must be 90 days, during which time electing members must submit a Service Retirement application stating the date of retirement. Such application must be filed with ERS 14 days prior to the effective retirement date. Under Part B, employees at least 55 years of age with 25 years of service credit, or otherwise eligible, retire with the benefit reduction applicable to employees who retire before reaching the age 62.

Other Postemployment Benefits

The City and the District provides healthcare benefits for retirees and their dependents. The benefit terms are dependent on which contract each employee falls under. The specifics of each contract are on file at the City and District offices and are available upon request.

The City's defined benefit OPEB plan, provides OPEB for all employees with 10 years of service for members in the NYSERS and 20 years of service for members in the PFERS. Retirees and spouses who are Medicare eligible are not required to contribute to retiree group health care benefits. If not Medicare-eligible, contributions vary by bargaining unit.

The District's defined benefit OPEB plan, provides OPEB for all employees who meet the NYSTRS/NYSERS eligibility requirements. Teachers and Administrators age 55 with 5 years of service who are eligible to retire and collect benefits according to the NYSTRS are eligible for retiree health care benefits for life from the School District. Support staff hired before January 1, 2010 age 55 with 5 years of service are eligible to retire and collect benefits for life from the School District according to NYSERS. Members after January 1, 2010 must be 55 years old with 10 years of service to qualify for NYSERS health care benefits.

The plans are a single-employer defined benefit OPEB plans administered by the City and District. Article 11 of the State Compiled Statutes grants the authority to establish and amend the benefit terms and financing requirements to the City and District's governing bodies. No assets are accumulated in a trust that meets the criteria in paragraph 4 of Statement 75.

For the fiscal year ended June 30, 2018, the City and District implemented GASB Statement No. 75, Accounting and Financial Reporting for Postemployment Benefits Other than Pensions (OPEB), which supersedes GASB Statement No. 45, Accounting and Financial Reporting by Employers for Postemployment Benefits Other than Pensions. GASB Statement 75 requires the net OPEB liability to be measured as the portion of the present value of projected benefit payments to be provided to current active and inactive employees that is attributed to those employees' past period of service (total OPEB liability), less the amount of the OPEB plan's fiduciary net position (if any). Accordingly, beginning net position and other postemployment benefits on the statement of net position were adjusted as noted in the following table:

Governmental and Business Type Activities

Balance at June 30, 2017, as previously stated	\$ 906,821,266
Restatement of beginning balance – Adoption of GASB No. 75:	
Increase to liability	541,688,417
Balance at June 30, 2017, as restated	\$1,448,509,683
Balance at June 30, 2017, as restated	\$1,448,509,683

Total OPEB liability for the City at June 30, 2021 is as follows:

The City

Balance at June 30, 2020, as restated	\$460,849,645
Service Cost Interest Changes of benefit terms Changes in assumptions or other inputs Differences between expected and actual experience Benefit Payments Net changes	17,841,500 11,512,239 0 (42,581,090) 43,231,775 (17,607,606) 12,396,818
Balance at June 30, 2021	\$473,246,463

Total OPEB liability for the District at June 30, 2021 is as follows:

The District

Balance at June 30, 2020	\$288,104,905
Service Cost	8,283,401
Interest	7,094,705
Changes of benefits	8,631,106
Changes in assumptions or other inputs	19,148,021
Differences between expected and actual experience	32,233,001
Benefit Payments	(13,617,053)
Net changes	61,773,181
Balance at June 30, 2021	\$349,878,086

The Syracuse Hancock International Airport

General Information. The Syracuse Hancock International Airport (the "Airport") is located approximately 4.6 miles northeast of the City of Syracuse in the County of Onondaga. Access to the Airport is provided by Interstate 81 and 90, both of which are located within 3 miles of the Airport. The Airport is classified as a small hub primary airport by the Federal Aviation Administration (the "FAA") and provides both public and military functions.

The Airport is the primary commercial service airport serving the needs of individuals located in the Syracuse Metropolitan Statistical Area, (the "MSA"), but is believed to impact as many as 12 other neighboring central New York State Counties. The MSA consists of the Counties of Onondaga, Madison, Oswego, and Cayuga. According to the 2010 U.S. Census the MSA's population is estimated at 742,603 (an increase of approximately 1.4% since the 2000 census).

Management of the Airport. The Airport is owned by the City of Syracuse, and is operated by the SRAA. The SRAA is a public benefit corporation, which was established to provide the necessary tools and support in order to maintain and operate the facilities in a safe, secure and efficient manner. The Authority is organized under the Public Authorities Law of the State of New York.

On January 2003, the Mayor announced an initiative to transfer operation of the Airport to an independent, regional authority in hopes of making the Airport's air fares and routes more competitive. The SRAA was created by the New York State Legislature on August 17, 2011 by Chapter 463 of the Laws of 2011 (the "Act"). The operating certificate of the Syracuse Hancock International Airport was transferred from the City of Syracuse to the SRAA on March 3, 2014. This transfer marked the final step in the process to transition the airport to an independent authority.

The mission of the SRAA is to provide safe, secure, efficient and low-cost air transportation service to the 12-county region that Syracuse Hancock International Airport currently serves. The Authority seeks to stimulate air service, economic development, trade and tourism by focusing on the shared goals of its stakeholders: more service to more destinations, lower operating costs and increased non-aeronautical revenue. The Authority recognizes that the Syracuse Hancock International Airport is a gateway to the central New York region and beyond and seeks to optimize customer service and exceed customer expectations with continuous improvements to the terminal building and public-use facilities.

The SRAA is mutually a corporate and political body, which constitutes a public benefit corporation. Under the Act the SRAA has been granted the power to: (i) sue and or be sued, (ii) create and alter, as deemed necessary, a corporate seal, (iii) issue debt, including bonds, for corporate and other purposes, (iv) acquire and or lease property from both private and governmental sources, (v) apply for grant funding, gifts, or various other loans, (vi) designate depositories for which to hold funds, (vii) establish a fiscal year, (viii) appoint administrators, employees and agents as required to perform essential duties, (ix) enter into joint service arrangement, (x) establish, construct, repair and manage property under its control, and (xi) do all things necessary to fulfill obligations named in the Act.

As noted, effective March 3, 2014, the FAA transferred the Part 139 Operating Certificate for the airport from the City of Syracuse to the Airport Authority (SRAA). The SRAA is now responsible for the day to day operation of the airport. The SRAA continues to work with the City through shared services until which time all employees covered by existing collective bargaining agreements are transferred from the City to the SRAA which is expected to be completed by 2021.

The SRAA is comprised of eleven (11) members, consisting of: seven (7) members appointed by the Mayor of the City of Syracuse, one (1) member appointed by the Onondaga County Executive, one (1) member appointed by Town Board of the Town of Dewitt, one (1) member appointed by the Board of Education of the East Syracuse Minoa Central School District, and one (1) member appointed on a rotating basis by the Town Board of the Town of Cicero, the Town Board of the Town of Salina, the Town Board of the Town of Clay and the Board of Education of the North Syracuse Central School District.

The following table presents the current voting members of the SRAA, their appointing organization, and their respective term expiration date.

SRAA Voting Members

Voting Member: Title:		Appointed By:	Term Expiration:	
Ms. Jo Anne Chiarenza Gagliano	Chair	City of Syracuse Mayor	December 31, 2024	
Mr. William P. Fisher	Vice Chair	Onondaga County Executive	December 31, 2024	
Dr. Shiu-Kai Chin	Finance Officer	City of Syracuse Mayor	December 31, 2022	
Mr. Nick Paro	Member	Town of Salina	December 31, 2022	
Mr. Michael J. Lazar	Member	Town Board of the Town of Dewitt	December 31, 2024	
Mr. Robert Simpson	Member	City of Syracuse Mayor	December 31, 2022	
Mr. Michael Frame	Member	City of Syracuse Mayor	December 31, 2023	
Ms. Latoya Allen	Member	City of Syracuse Mayor	December 31, 2022	
Mr. Kenneth J. Kinsey	Member	City of Syracuse Mayor	December 31, 2024	
Hon. Michael Quill	Member	City of Syracuse Mayor	December 31, 2024	
Dr. Donna DeSiato	Member	East Syracuse Minoa CSD, BOE	December 31, 2024	

Also see "Financial Factors – Airport Enterprise Funds," herein.

Airport Facilities. The Airport occupies a land area of approximately 2,000 acres and has two operational runways and an associated system of taxiways. Almost all taxiways are at least 75 feet wide and have paved surfaces that are up to 12 inches thick on top of several feet of compacted sub-base material. The primary air carrier runway is Runway 10-28 which is 9,003 feet long and 150 feet wide. Runway 10-28 has a Category II Instrument Landing System. The second operational runaway is Runway 15-33 which is 7,500 feet by 150 feet. Runway 15-33 utilizes a non-precision instrument landing approach.

The passenger terminal complex at Syracuse Hancock International Airport consists of three areas, a South Terminal (Terminal A), a North Terminal B (Terminal B), and a main concourse. The complex occupies approximately 410,000 square feet.

The Airport completed a \$45 million dollar public side upgrade project. Improvements include new facade, doors, flooring, counters and other publicly used amenities (museum, rest rooms). Funding was provided by the NYS Department of Transportation, the Federal Aviation Administration and Onondaga County. Airport officials announced completion in October of 2018.

See also "Financial Factors - Airport Enterprise Funds," herein.

Airport Finances. Pursuant to a lease agreement, the SRAA leases the properties comprising the Airport from the City. A separate legal entity, the SRAA, is included as a discretely presented component unit within the City's basic financial statements due to the City's ability to impose its will. Pursuant to a service agreement, the SRAA reimburses the City for certain services that have been rendered by employees of the City under the City's Department of Aviation and certain expenses incurred in the administration and operation of the Airport. Upon expiration or earlier termination of the lease term, the Airport reverts to the City and the City will be required to obtain the operating certificate from the FAA in order to continue to administer and operate the Airport. Separate audited financial statements are prepared for the SRAA and may be obtained by contacting the City's Municipal Advisor.

Airlines Serving the Airport. The SRAA negotiated a 10 year binding Signatory Agreement in 2016 with passenger airlines American, Delta, JetBlue and United and with cargo airlines Federal Express and United Parcel Service. At the same time, they negotiated a non-signatory, non-affiliate agreement providing minimum performance standards and insurance guidelines for scheduled low cost carriers including Allegiant (2016) and Frontier (2018). Their service is typically variable (not daily) and seasonal (not annual). Allegiant currently serves 5 destinations while Frontier serves 3. Allegiant became a signatory airline in December, 2019.

The Authority's Administration continues to meet with both existing airlines and others not currently serving the Airport in an effort to expand service by means of frequency to existing routes and providing new routes.

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Enplanements. The following table presents historical enplanement and deplanement passenger traffic at the Airport on a calendar year basis from 2012 through 2021.

Enplanements and Deplanements 2011 – 2021 (Calendar Year)

Calendar Year	Enplanements	Deplanements	Totals	
2012	988,347	995,327	1,983,674	
2013	1,000,466	1,011,224	2,011,690	
2014	998,900	1,002,414	2,001,314	
2015	1,000,722	1,007,132	2,007,854	
2016	999,158	1,004,908	2,004,066	
2017	1,038,308	1,036,570	2,074,878	
2018	1,156,458	1,159,475	2,315,933	
2019	1,293,353	1,289,840	2,583,193	
2020	449,422	442,262	891,684	
2021	852,716	842,638	1,695,354	
	9,777,850	9,791,790	23,311,717	

Source: Airport Officials.

Airport Debt. The City has made timely payments of principal and interest on all of the Airport's outstanding bonds and other obligations. As of October 21, 2021, the Syracuse Regional Airport Authority refunded their bonds in the amount of \$35,105,000 thereby taking over the remainder of debt from the City. As of June 8, 2022, the total outstanding debt of the Airport was \$0. Following the refunding in 2021, the City will make no future debt payments on behalf of the Airport. The City does not have any general obligation debt outstanding on behalf of the Airport. See "Indebtedness," and "Financial Factors – Airport Enterprise Funds" herein.

FINANCIAL FACTORS

Budgetary Procedure

The Director of the Office of Management and Budget (the "Budget Director") has the primary responsibility for preparing the City's annual operating budget, supervising the execution of the operating budget and reporting budgetary variances to the Mayor. The School District proposes a separate budget that is approved by the Board of Education after a public hearing. Thereafter, the School District's budget is transmitted to the City's Budget Director for inclusion in the Citywide budget.

The Budget Director begins to compile budget data on or before February 6, at which time the various offices, departments, and agencies of the City (including the School District) submit estimates of the operating requirements for the next fiscal year. Upon completing the review of the estimates and any related supporting documentation, the Budget Director prepares and transmits the budget, together with a detailed work program, to the Mayor on or before March 18.

The Capital Improvement Plan (the "CIP") is completed in the Fall of each year. All large City departments project capital needs for the succeeding 6-year period. Their projections are submitted, reviewed and vetted by the Budget Department. After review, the CIP is sent to the Mayor for further review and any necessary changes. Once complete, the CIP is sent to the Common Council on or around December 31st. The CIP is not voted on.

The Mayor reviews the budget and work program and, in the process, may hear the views of any office, department or board. Following her review, the Mayor approves the budget and work program in its original form or with such changes as she deems appropriate. The Mayor must cause a copy of the budget to be published in the City's official newspaper. Copies of the budget and work plan must also be provided to each member of the Common Council as well as each City office, department and board. The Mayor is required to formally transmit the budget to the Common Council not later than April 8.

The Common Council must conduct a public hearing on the proposed budget submitted by the Mayor. A notice specifying the date, time, and place for the hearing must be published at least once in the official newspaper of the City. Members of the public may express their views at the budget hearing but the public does not actually vote on the proposed budget. After the hearing but not later than May 8, the Council must adopt the budget as presented or as amended by it. Except for amounts appropriated for lawful judgments, the Common Council may make whatever other changes in the line items for revenue estimates or appropriations it deems necessary. Such changes must be stated separately and distinctly from the original line items submitted by the Mayor. The Common Council may also change the total revenues and expenditures set forth in the Mayor's budget.

If the Common Council makes no changes to the budget, then the budget, as submitted by the Mayor, is deemed to be adopted and no further action is required. However, if the budget approved by the Common Council contains changes, the City Clerk must present such budget to the Mayor who may either sign the budget or return it to the Common Council with a list of objections. The Common Council must reconsider those items objected to by the Mayor and affirm such changes by a two-thirds vote of its members. If the Mayor fails to return the budget, as modified by the Common Council, to the City Clerk within 10 days, the budget is deemed to be adopted. Furthermore, if the budget has not been adopted by June 1, the budget with such changes to which the Mayor did not express objection, shall be the budget for the ensuing year.

Budgetary control is the responsibility of the Budget Director. Upon adoption of the budget, the Budget Director must prepare an allocation schedule of the appropriations for the various units of the City. Approved budgetary allocations must be certified to the Commissioner of Finance and the managers of the various organizational units. The Commissioner of Finance shall not approve any commitment or expenditure which fails to conform to the certified allocation schedule.

The Budget Director monitors the budget throughout the year and reports any significant variances therefrom to the Mayor. Pursuant to Charter, no expenditure or contract to expend money or liability may be incurred unless an appropriation for such purpose is available in the budget. If the Mayor determines, at any time, that estimated revenues and appropriated fund balances are less than the total appropriations, she must revise the budget to insure that expenditures do not exceed available resources.

Modifications to the budget may be made by the Mayor during the year. The Mayor may transfer line items within an office or department. Transfers between offices or departments must be approved by the Common Council. The City's independent auditors interpret this provision to require Council approval for temporary interfund advances. The City's administration, however, disagrees with the auditors' view because such advances do not constitute a transfer of spending authority. An appropriation of surplus revenue or unanticipated funds for expenditure during a fiscal year also requires an ordinance of the Common Council.

The City is subject to the provisions of Chapter 97 of the Laws of 2011, which imposes a limitation on the amount of real property taxes that may be levied. See "Tax Levy Limitation Law," herein.

CERTAIN BUDGET INFORMATION FOR THE CITY FOR THE FISCAL YEAR ENDING JUNE 30, 2022 IS PRESENTED IN APPENDIX B HERETO. IN ADDITION, DISCUSSIONS OF SUCH BUDGETS IS PRESENTED HEREIN BELOW.

Full copies of the City's Adopted Budgets may be obtained from their official website: http://www.syrgov.net/Budget_Home_Page.aspx

City Multi-Year Financial Plan (Fiscal 2022 – 2027). The City's multi-year plan projects revenues and expenditures for several years into the future. The City's current plan contains the budgeted amounts for fiscal year ending June 30, 2022 and projected revenues and expenditures for fiscal years 2022-23 through 2026-27. The 2021-22 budget was balanced in accordance with State law. Fund balance is projected to be \$101.6 million in fiscal year 2022 and budgeted to be \$86 million in fiscal year 2023. The City plans to utilize \$16.7 million of ARPA federal relief funds along with \$15.6 million of fund balance to bridge the gap between revenues and expenditures in fiscal year 2023. Projected fund use for fiscal years 2023-24, 2024-25 and 2025-26 is \$20.8 million, \$16.6 million and \$13 million, respectively. The City plans to actively manage revenues and expenditures through 2026-27 in order to minimize funding gaps in the coming years.

SCSD Financial Plan

The following section relating to the SCSD's financial plan was provided by SCSD officials.

The SCSD maintains a 5-year financial plan for the General and Special Aid Funds. Such plan includes projections for the fiscal years 2021-22 through 2025-26. General Fund revenue is projected to grow in each year of the forecast. Revenue is projected to increase by \$26.9 million (6.0%) in 2021-22 and \$8.3 million (1.8%) in 2022-23. Thereafter annual revenue growth is projected at \$13.8 million (2.9%) in fiscal year 2023-24, \$16.6 million (3.4%) in fiscal year 2024-25, and \$17.3 million (3.4%) in fiscal year 2025-26. Real property tax revenues are projected to remain relatively flat through fiscal year 2025-26. See "Tax Levy Limitation," herein. State Aid to Education, which currently makes up 80.7% of estimated revenue for the SCSD's General Fund budget, is projected to increase 4.8% in fiscal year 2022-23. Thereafter, State Aid is projected to increase 4.0% annually in 2023-24 through 2025-26, based upon the SCSD's expectation that it will receive such aid. Based on the SCSD's assumptions, State Aid to Education would constitute approximately 85% of total general fund revenue by fiscal year 2025-26.

Funding for special aid programs is projected to be \$143.7 million in fiscal year 2021-22 which includes the federal Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act and American Rescue Plan (ARP) Act funding. Special aid revenue is projected to decrease to \$124.0 million in 2022-23, \$122.3 in 2023-24, and then to \$77.6 million in 2024-25 and \$77.8 million in 2025-26 after CRRSA Act and ARP Act funding ends.

The SCSD plans to closely manage contractual services, health care expenses, and staffing in order to control costs during the five years of the financial plan. Total budgeted full-time employment increase by 45 positions in 2021-22, is budgeted to increase by 114.6 positions in 2022-23, and projected to remain constant or decline for the remainder of the forecast. The SCSD financial plan projects that \$30.9 million will be added to fund balance during 2021-22 primarily due to cost savings in wages, transportation, health insurance and contract services and no fund balance will be needed to balance the budget for 2022-23. Assigned and unassigned fund balance as of June 30, 2021 was \$95.0 million, and is projected to be 125.9 million as of June 30, 2022 and then remain the same in 2022-23 and 2023-24, then decrease by \$17.6 million in 2024-25 and \$15.4 million in 2025-26.

The revenue and expenditure projections presented in the School District's plan are as follows:

Financial Plan for the Years Ending 2022 - 2026

	2021-22 (millions)	2022-23 (millions)	2023-24 (millions)	2024-25 (millions)	2025-26 (millions)
General Fund:					
Revenue	\$472.5	\$480.8	\$494.6	\$511.2	\$528.5
Expenditures (1)	-441.6	-480.8	-494.6	-528.8	-543.9
Use of (Add to)					
Fund Balance	(30.9)	0	0	17.6	15.4
Projected Fund					
Balance June 30th (2)	\$125.9	\$125.9	\$125.9	\$108.3	\$92.9
Special Aid Fund:					
Revenue	\$143.7	\$124.0	\$122.3	\$77.6	\$77.8
Expenditures	143.7	124.0	122.3	77.6	77.8
Use of Fund Balance	0	0	0	0	0

⁽¹⁾ Staff positions is budgeted to increase by 45 positions in 2021-22 and 114.6 positions in 2022-23. Staffing is projected to remain constant or decline for the remainder of the forecast period.

The projections set forth in the SCSD's 5-year financial plan are based on the expectations of SCSD officials about future events, economic performance and other items which are beyond the control of the SCSD. Such statements

⁽²⁾ Reflects both assigned and unassigned portion of fund balance.

should not be construed as statements of fact. Actual results may differ materially from the projections of SCSD officials.

Source: SCSD Officials.

Mid-Year Budget Report – Year Ending June 30, 2022 (Preliminary and Unaudited Information)

When approved in May 2021, the 2021-22 general fund budget totaled \$266.2 million. This budget included a \$0 appropriation of fund balance to balance revenues with estimated expenditures. The City projects that \$21.7 million will be added to the City's General Fund Balance at the end of fiscal year 2022. Irrespective of the use of Fund balance, General Fund revenues are projecting a positive variance of \$22.2 million and expenditures a negative variance of \$628,000.

Source: The 2021-22 Mid-Year Budget Report, the City Office of Budget.

Adopted Budget For The Fiscal Year Ending June 30, 2023

For fiscal 2022-23, the General Fund budget, including other financing sources and uses, increased by approximately \$28.9 million. Under the budget, spending for the School District's General Fund, including other financing sources and uses, was set at \$489.2 million, which is approximately \$28.9 million higher than the 2021-22 adopted budget. The budgets for the other operating funds of the City which include the aviation, water and sewer funds, provide for total spending of \$36.9 million in fiscal 2022-23, which was an increase of \$389 thousand compared to the 2021-22 adopted budget.

Sales Tax. The City's General Fund proposed budget for 2022-23 includes estimated sales tax revenue of \$112.4 million, which was an increase of approximately \$20 million compared to the 2021-22 adopted budget. See "Financial Factors, Sales Tax," herein.

State Aid. The State aid estimates included in the City's and School District's General Fund proposed budget for fiscal 2022-23 are based on the Governor's budget submitted to the State Legislature for the State's fiscal year, which began on April 1, 2022. For 2022-23, the City estimates State aid revenue of approximately \$76.1 million for general City purposes and \$408.3 million for educational purposes.

Real Property Taxes. The real property taxes levy (inclusive of estimated STAR exemptions) for City and City Purposes is proposed to increase in fiscal 2022-23 by 5.8% compared to the 2021-22 adopted budget.

Independent Audits

The Single Audit Act Amendments of 1996 requires the City to have an annual audit of its financial statements. The terms of the Act, as amended, and implemented by Circular A-133 of the Federal Office of Management and Budget, stipulate that governments expending \$500,000 or more in Federal assistance during any one year must have an organization-wide financial audit. The City engages a firm of independent certified public accountants to audit the City's financial statements, in accordance with the provisions of the Single Audit Act. The City's basic financial statements, notes thereto and the auditors' report thereon for the fiscal year ended June 30, 2020 are on file with the Municipal Securities Rulemaking Board.

The City and School District auditors' report on compliance and internal controls issued to the City and School District cites various weaknesses in the internal controls for financial reporting, including some that are considered to be material weaknesses. The compliance reports are not included as a part of the audited financial statements. However, additional information or the reports can be obtained from the City or from the City's Municipal Advisor.

State Audits. The City is subject to audit by the State Comptroller to review compliance with legal requirements and the rules and regulations established by the State. In the recent past, as noted below, the City has been audited by the State on three separate occasions. Subsequent to each audit, a report was released by the State indicating their findings. The audit reports and recommendations reflect only the viewpoint of the State and are intended to be resources for the

City. In addition, recommendations included in the reports are intended to assist with the effective management of governmental operations.

A report reviewing the Safety Plans required under the Safe Schools Against Violence in Education (SAVE) Act by the Syracuse City School District was made available on July 25, 2019. Full copies of the State audit may be obtained by visiting their website at: https://www.osc.state.ny.us/local-government/audits/charter-school/2019/07/25/safe-schools-against-violence-education-save-act-safety-plans-2019-ms-1

A report reviewing the use of foreign fire insurance tax money was made available on January 12, 2018. Full copies of the State audit may be obtained by visiting their website at:

http://www.osc.state.ny.us/localgov/audits/swr/2018/Foreign-Fire/syracuse-city.pdf

A report reviewing parking structures was made available on December 29, 2017. Full copies of the State audit may be obtained by visiting their website at:

http://www.osc.state.ny.us/localgov/audits/swr/2017/Parking-Structures/city-syracuse.pdf

A report reviewing the claims audit process of the Syracuse City School District covering the period July 1, 2014 through March 31, 2016 was made available on October 21, 2016. Full copies of the State audit may be obtained by visiting the Office of the State Comptroller's official website at:

http://www.osc.state.ny.us/localgov/audits/schools/2016/syracuse.pdf

A report reviewing law enforcement action covering the period January 1, 2008 through January 22, 2014 was made available on September 17, 2014. Full copies of the State audit may be obtained by visiting their website at: http://www.osc.state.ny.us/localgov/audits/swr/2014/SORA/global.pdf

In addition to City audits, a report reviewing the project approval, monitoring and administration of the Syracuse Industrial Development Agency's Development Fund was made available on January 8, 2016. Full copies of the State audit may be obtained by visiting their website at:

http://www.osc.state.ny.us/localgov/audits/ida/2016/syracuseida.pdf

Summary of Significant Accounting Policies

See "Notes to Financial Statements," for the Year Ended June 30, 2021.

Investment Policy

Pursuant to Section 39 of the State's General Municipal Law, the City has an investment policy applicable to the investment of all moneys and financial resources of the City. The responsibility for the investment program has been delegated by the City Charter to the Commissioner of Finance who was required to establish written operating procedures consistent with the City's investment policy guidelines. According to the investment policy of the City, all investments must conform to the applicable requirements of law and provide for: the safety of the principal; sufficient liquidity; and a reasonable rate of return.

Authorized Investments. The City has designated six banks or trust companies located and authorized to conduct business in the State to receive deposits of money. The City is permitted to invest in special time deposits or certificates of deposit.

In addition to bank deposits, the City is permitted to invest moneys in direct obligations of the United States of America, obligations guaranteed by agencies of the United States where the payment of principal and interest are further guaranteed by the United States of America and obligations of the State. Other eligible investments for the City include: revenue and tax anticipation notes issued by any municipality, school district or district corporation other than the City (investment subject to approval of the State Comptroller); obligations of certain public authorities or agencies; obligations issued pursuant to Section 109(b) of the General Municipal Law (certificates of participation) and certain obligations of the City, but only with respect to moneys of a reserve fund established pursuant to Section 6 of the General Municipal Law. The City may also utilize repurchase agreements to the extent such agreements are based upon direct or guaranteed obligations of the United States of America. Repurchase agreements are subject to

the following restrictions, among others: all repurchase agreements are subject to a master repurchase agreement; trading partners are limited to banks or trust companies authorized to conduct business in the State or primary reporting dealers as designated by the Federal Reserve Bank of New York; securities may not be substituted; and the custodian for the repurchase security must be a party other than the trading partner. All purchased obligations, unless registered or inscribed in the name of the City, must be purchased through, delivered to and held in the custody of a bank or trust company located and authorized to conduct business in the State. Reverse repurchase agreements are not allowed under State law.

Collateral Requirements. All City deposits in excess of the applicable insurance coverage provided by the Federal Deposit Insurance Act must be secured in accordance with the provisions of and subject to the limitations of Section 10 of the General Municipal Law of the State. Such collateral must consist of the "eligible securities," "eligible surety bonds" or "eligible letter of credit" as described in the Law.

Eligible securities pledged to secure deposits must be held by the depository or third-party bank or trust company pursuant to written security and custodial agreements. The City's security agreements provide that the aggregate market value of pledged securities must equal 102% of the principal amounts of deposit, the agreed upon interest, if any, and any costs or expenses arising from the collection of such deposits in the event of a default. Securities not registered or inscribed in the name of the City must be delivered, in a form suitable for transfer or with an assignment in blank, to the City or its designated custodial bank. The custodial agreements used by the City provide that pledged securities must be kept separate and apart from the general assets of the custodian and will not, under any circumstances, be commingled with or become part of the backing for any other deposit or liability. The custodial agreement must also provide that the custodian shall confirm the receipt, substitution or release of the collateral, the frequency of revaluation of eligible securities and the substitution of collateral when a change in the rating of a security may cause ineligibility.

An eligible irrevocable letter or credit may be issued, in favor of the City, by a qualified bank other than the depository bank. Such letters may have a term not to exceed 90 days and must have an aggregate value equal to 140% of the deposit obligations and the agreed upon interest. Qualified banks include those with commercial paper or other unsecured or short-term debt ratings within one of the three highest categories assigned by at least one nationally recognized statistical rating organization or a bank that is in compliance with applicable Federal minimum risk-based capital requirements.

An eligible surety bond must be underwritten by an insurance company authorized to do business in the State which has claims paying ability rated in the highest rating category for claims paying ability by at least two nationally recognized statistical rating organizations. The surety bond must be payable to the City in an amount equal to 100% of the aggregate deposits and the agreed interest thereon.

Airport Enterprise Fund. The City signed a non-cancellable lease agreement with the SRAA, effective as of March 1, 2014 for an initial period of forty (40) years. Renewals of the lease term are automatic for additional ten-year terms as discussed in Note 6 of the City's audited financial statements as of and for the year ended June 30, 2021. Per the lease agreement, the SRAA will lease all premises that comprise the Airport, and will maintain, repair and operate the Airport, at its own cost and expense. All land acquired and improvements made by or on behalf of the SRAA to the Airport during the term of the agreement shall be deemed property of the City, and title shall vest in the City upon acquisition or completion of the project in which improvements are made.

The City recorded approximately \$1,655,000 in non-operating revenue from capital contributions for the fiscal year ended June 30, 2021.

The land, buildings and improvements cost approximately \$437,000,000 with accumulated depreciation of approximately \$272,000,000 and are included in the business-type activities. The SRAA is required to make rental payments to the City equal to the principal and interest due on Airport-related debt issued by the City. These rental payments totaled \$3,320,650 during the year ended June 30, 2021.

Future minimum lease payments due to the City as of June 30, 2021 under this operating lease are as follows:

Minimum Lease Payments (Due to the City)

Fiscal Year Ending June 30:	Minimum Payment
2022	\$3,314,919
2023	3,303,388
2024	3,047,588
2025	3,045,638
2026	3,048,694
2027-2037	33,530,190
Total	\$49,290,417

See "Notes to Financial Statements- Note 6" (page 56) in the audited financial statements of the City for the fiscal year ended June 30, 2021.

As of October 21, 2021, the Syracuse Regional Airport Authority refunded their bonds in the amount of \$35,105,000 thereby taking over the remainder of debt from the City. As of June 8, 2022, the total outstanding debt of the Airport was \$0. Following the refinancing in 2021, the City will make no future debt payments on behalf of the Airport.

The City's audited financial statements as of and for the year ended June 30, 2021 report a net position in the Aviation Fund of \$106,790. See "Statement of Net Position - Proprietary Funds" (page 16) in the audited financial statements of the City for the fiscal year ended June 30, 2021.

See "The Syracuse Hancock International Airport," herein.

Revenues

The combined revenue for the General Funds of the City and School District for the year ended June 30, 2021 was \$698,399,762 (excluding other financing sources). Locally generated income constituted 33% of the total, while Federal and State assistance (primarily State aid to education) made up the remaining 67%.

Real Property Taxes. Real property taxes are used solely to finance the General Fund operations of the City and School District. In Fiscal 2021, \$41,509,108 was recorded for real property tax revenue in the City General Fund and \$61,247,086 was reported for the School District. Excluding other financing sources, real property taxes accounted for approximately 13.9% of the combined revenue in the General Funds of the City School District for fiscal 2021.

The following table presents the audited amount of real property tax and tax items revenue recorded for the City's General Fund for 2017 through 2021, the amount of such revenue estimated in the adopted budgets for 2022 and 2023.

City General Fund Real Property Tax Revenue 2017-2023

Fiscal Year Ending June 30:	Real Property Tax Revenue	% Of General Fund Revenue (1)
2017	¢20,420,402	16.7
2017	\$38,430,482	16.7
2018	38,799,174	16.6
2019	38,286,111	14.4
2020	39,725,982	18.1
2021	41,509,108	16.1
2022 (Projected)	38,696,759	14.5
2023 (Adopted Budget)	40,851,161	13.8

(1) Computation excludes other financing sources.

Source: The Audited Financial Statements and Budgets of the City. The summary itself is not audited.

See "Real Property Taxes," herein.

Sales Tax. The City and County entered into a 10-year sales tax agreement which became effective on January 1, 2011. Under the agreement, the City received 22.25% of the revenue generated by the County's base tax rate of 3% and 11.35% of the additional 1% tax rate in calendar year 2011. The allocation formula reduced sales tax revenue during the 2011 fiscal year.

Effective January 1, 2012, the City received its allocation entirely from the additional 1% sales tax levied by the County. The City's share of the additional 1% tax was 92.80% in 2012, after which there are annual increases in the percentage to 97.79% for the final six years of the agreement ending on December 31, 2020. In December 2018, the City and County agreed to extend the terms of the agreement through 2030.

The agreement eliminates the minimum annual sales tax guaranteed in the prior agreement. City officials recognize the risks associated with removing the guarantees found in the prior agreement but believe the ability of the City to share in the potential future growth of sales tax revenue outweighs the risk of the decline in such revenue.

Total sales tax received by the City in the General Fund for the fiscal year ended June 30, 2021 was \$100,134,331. The Mid-Year Budget Report for 2021-22, as prepared by the City Budget Department, projected a positive budget variance of approximately \$17,7 million for sales tax revenue. Sales tax can be extremely volatile, since it is based on the economy and consumer confidence.

The following table presents the audited amount of sales tax recorded for the City's General Fund for 2017 through 2021, the amount of such revenue estimated in the adopted budgets for 2022 and 2023.

City General Fund Sales Tax Revenue 2017-2023

Fiscal Year	Sales	Percentage of	
Ending	Tax	General Fund	
June 30:	Revenue	Revenue (1)	
2017	\$81,418,802	35.4	
2018	87,057,793	37.3	
2019	89,344,677	43.3	
2020	85,414,655	38.9	
2021	100,134,331	38.8	
2022 (Projected)	110,000,000	44.0	
2023 (Adopted Budget)	112,350,000	44.2	

- Computation excludes other financing sources.
- Inclusive of the planned use of fund balance \$0 in 2021-22 and \$15.6M in 2022-23).

Source: The Audited Financial Statements and Budgets of the City. The summary itself is not audited.

The School District also receives a portion of the County sales tax. Subject to the terms and conditions discussed above, the County will distribute a minimum of \$12,500,000 each year to the school districts in the County. Sales tax moneys will be allocated to the school districts according to total average daily attendance. Annual payments may be increased by up to 2% based on growth in the County's sales tax revenue. For the year ended June 30, 2021, the School District reported \$751,558 for sales tax. The School District's 2022 adopted budget estimates \$450,000 for sales tax revenue.

Payments In–Lieu of Taxes ("PILOTs"). The City recorded revenue of \$4,783,645 from PILOTs during fiscal 2021. PILOTs are received from various economic development project agreements negotiated by the City. Although these properties are not included as taxable property on the City's tax roll, each project is assigned an assessed valuation. Assessments for PILOTs are generally determined in the same manner as assessments for real property taxes. PILOT revenue for the 2021-22 fiscal year was budgeted at \$4,814,904.

The Common Council authorized the Mayor to execute and deliver the PILOT agreement in connection with the expansion of the Carousel Center Mall effective January 1, 2006. Under the agreement, the payments are used to pay debt service on SIDA bonds issued in February 2007 in connection with the expansion of the existing Carousel Center. The PILOT payments fund debt service on the 2007 SIDA Bonds and do not constitute revenue of the City. PILOT payments are expected to escalate by 4% each year until the 2007 SIDA Bonds mature or are redeemed.

In connection with the expansion of the Carousel Center ("Destiny USA Project"), SIDA issued \$228,085,000 PILOT Revenue Bonds, Series 2007A in February 2007. Simultaneously with the issuance of the Series 2007A Bonds, SIDA privately placed \$97,648,352 PILOT Revenue Bonds, Taxable Series 2007B. The Series 2007A and Series 2007B Bonds are collectively referred to as the "Series 2007 Bonds," the proceeds of which will be used to pay for Destiny USA Project, including public infrastructure, parking and public use improvement. (see "Economic and Demographic Information," herein). PILOT payments from the existing Carousel Center provide the source of payment and security for the Series 2007 Bonds issued by SIDA. The City is not obligated to pay the principal of the Series 2007 Bonds or the premium, if any, or interest thereon. Moreover, the City has not pledged its faith and credit or taxing power for the purpose of making such payments.

Parking Fees. The City operates various surface parking lots, parking garages and metered parking areas. For the year ended June 30, 2021, the City recorded parking revenue under the Department of Public Works of \$4,111,247. Parking lots and garages contributed \$2,587,472, while \$1,523,775 was received from parking meters. The 2022 adopted budget estimates \$6,055,000 will be received from parking fees.

(The remainder of this page has been left intentionally blank.)

State Aid

State Aid Revenue (1)(2)

June 30:	2015		2016	_	2017	2018	
City General Fu	nd:						
Mortgage Tax	\$ 893,	232	\$1,244,56	7	\$1,346,23	\$ 899,78	33
Highway Aid & Maint. Other Aid AIM ⁽³⁾	2,901, 189, 71,758,	896	3,971,37 296,56 71,758,58	6	4,539,00 342,47 71,758,58	76 211,75	50
	\$ 75,743,		\$77,271,09		\$77,986,36		
School District General Fund:							
Operating Aid ⁽² Other Aid	\$227,881, 57,840,		\$271,678,85 62,949,11		\$259,818,9 61,127,94		
	\$285,721,	815	\$334,627,97	7	\$320,317,83	56 \$332,362,50	03
June 30:	2019		2020		2021	2022 (Projected)	2023 (Budget)
City General Fund:							
Mortgage Tax Highway Aid	\$1,480,545		\$1,229,014		\$1,444,343	\$1,700,000	1,100,000
& Maint. Other Aid	2,736,392 470,000	9	\$ 4,126,044 1,886,400		\$3,593,851 14,643	\$3,170,545 48,000	3,170,545 48,000
AIM (3)	71,758,584		58,250,610	;	86,110,301	71,758,584	71,758,584
	\$76,445,521	\$	65,492,068	\$9	91,163,138	\$76,677,129	76,077,129
School District General Fund:							
Operating Aid (2)	\$ 294,391,639	\$ 3	10,968,888 \$	30	04,774,766	\$331,461,257	344,750,582
Stimulus Aid Other Aid	-0- 49,517,822		-0- 51,303,026		-0- 51,689,095	-0- 53,423,712	-0- 55,195,361
,	\$ 343,909,461	\$ 3	62,271,914 \$	3:	56,463,861	\$384,884,969	399,945,943

Data for the years ended June 30, 2015 through 2023 was derived from audited financial statements and adopted budgets of the City, City officials, reports obtained from the Office of the New York State Comptroller. (1)

Source: The City, the City School District and reports obtained from the Office of the New York State Comptroller.

FURTHER STATE BUDGETARY RESTRICTIONS WHICH ELIMINATE OR SUBSTANTIALLY REDUCE STATE AID COULD HAVE A MATERIAL ADVERSE EFFECT UPON THE CITY AND SCHOOL DISTRICT, REQUIRING EITHER A COUNTERBALANCING INCREASE IN REVENUES FROM OTHER SOURCES, TO THE EXTENT AVAILABLE, OR A CURTAILMENT OF EXPENDITURES OR A COMBINATION THEREOF.

⁽²⁾ (3) Excludes STAR aid

The State's "Aid and Incentive for Municipalities" ("AIM") consolidated the Revenue Sharing and the aid to distressed cities programs.

Events Affecting New York School Districts

The recent history of state aid to school districts in the State for the last five years is as follows:

School district fiscal year (2018-2019): The State's final education budget includes record support for schools of more than \$26 billion, including an increase of \$1 billion over last year. This four-percent increase continues the commitment of funding education at a rate higher than the growth of the rest of the budget. In addition, the State 2018-19 Budget allows the Governor to reduce aid to school districts mid-year if receipts from the Federal government are less than what was expected. The Legislature then will have 90 days to approve the Governor's plan.

School district fiscal year (2019-2020): For the 2019-20 school year, the Executive Budget recommends a total of \$27.69 billion for School Aid, a year-to year funding increase of \$956 million or 3.6 percent. The Executive Budget will provide additional funding for Foundation Aid, including increased set aside funding for Community Schools. However, former Governor Cuomo has stated that the State is facing a large (approximately \$2.8 billion) revenue shortfall in its current fiscal year that has rendered his Executive Budget "untenable."

School district fiscal year (2020-2021): Due to the below-described decrease in State revenues as a result of the COVID-19 pandemic, the State budget includes an increase of only \$95 million in State Aid (0.035% increase from the prior budget year), and Foundation Aid remains the same as the 2019-2020 fiscal year. While the budget actually includes a decrease in State aid (referred to as a "Pandemic Adjustment"), the decrease in State aid will be fully offset by the State's allocation of federal stimulus funds. Absent the federal stimulus funds, there would have been a \$1.127 billion decrease in State aid from the 2019-2020 year.

School district fiscal year (2021-2022): It should be noted that the City of New York was an early epicenter of the COVID-19 pandemic in the United States, and as a result the State has suffered (and expects to continue to suffer) significant revenue shortfalls and unanticipated expenses. At the time that the State budget was being finalized in early April, the Budget Director estimated that, due to COVID-19, the State would suffer an anticipated budget gap of \$10-\$15 billion in the coming year.

To mitigate such a potential gap, the State's adopted budget for the fiscal year ending March 31, 2021 allows the State to reduce expenditures (including aid to local school districts and municipalities) if, during certain defined periods in 2020 (i.e., April 1 - April 30, May 1- June 30, and July 1 - December 31), tax receipts are lower than anticipated or disbursements from the State's general fund are higher than anticipated. In such a scenario, the State Budget Director will develop a plan to make spending reductions. The State Budget Director's plan would take effect automatically unless the Legislature passes its own plan within ten days. It is theoretically possible for such reductions to later be restored under certain circumstances.

On April 25, 2020, the State Division of the Budget announced the release of the State's Fiscal Year 2021 Enacted State Budget Financial Plan (the "Financial Plan"), which projects a \$13.3 billion (14%) shortfall in revenue from the Executive Budget Forecast that was released in January and estimates a \$61 billion decline in State revenues through Fiscal Year 2024 as a direct consequence of the COVID-19 pandemic. As a result, in the absence of federal assistance, initial budget control actions outlined in the Financial Plan will reduce spending by \$10.1 billion from the Executive Budget. This represents a \$7.3 billion reduction in State spending from FY 2020 levels.

The District believes that it would mitigate the impact of any delays or the reduction in State aid by reducing expenditures, increasing revenues, appropriating other available funds on hand, and/or by any combination of the foregoing. (See also "Market Factors" herein).

School District Fiscal year (2022-2023): The State's FY 2023 Executive Budget Financial Plan recommends \$31.2 billion in State aid to schools for school year 2023. This is an increase of \$2.1 billion, or 7.1 percent from the previous year. This increase is due to a \$1.6 billion (8.1 percent) increase in Foundation Aid.

REAL PROPERTY TAXES

The City derives its power to levy ad valorem real property taxes from the State Constitution, subject to the applicable statutory limits. Such taxes are levied for City and City Purposes. The City's power to levy real property taxes (including for school purposes), other than for debt service and certain other purposes, is limited by the State Constitution to two percent of the five-year average full valuation of taxable real property of the City. Taxes levied for net debt service, capital expenditures and judgments and claims are excluded from the limitation.

Real Estate Tax Levying Limitation Year Ending June 30, 2022

Two Per Centum of Five-Year Average Full Valuation*	\$ 101,612,604
Total Tax Levy (2)	\$106,717,685
Exclusions Thereto (1)	36,132,978
Tax Levy Subject to Tax Limit	70,584,707
Percentage of Tax Limit Exhausted	69.46 %
Tax Constitutional Margin (3)	\$ 31,027,897

- Based on special equalization rates as determined by the State Office of Real Property Tax Services (the "ORPTS").
- (1) Exclusions include net debt service and appropriations for capital expenditures and judgments and claims.
- (2) Gross levy before STAR exemptions.
- The City's tax levying margin for 2020-21 was \$23,895.930.

Constitutional Tax Limit Form for the Year Ending June 30, 2022. Source:

Assessment Procedures

The City generally determines the valuation of taxable real properties as prescribed by the Real Property Tax Law of the State. The City Assessor undertakes regular inspections of properties to ensure that new construction or improvements or demolitions are properly reflected on the tax rolls. The ORPTS determines the assessed valuation of special franchises, certain telecommunications properties, and the taxable ceiling of railroad property. Special franchises include assessments on certain specialized equipment of utilities above, under, upon and through public streets or public places. Assessments are made on certain properties that are taxable for school purposes but exempt for general municipal purposes.

The City revalued all taxable properties effective for the year ended June 30, 1997. City officials believe that the revaluation provides a more equitable distribution of the real property tax burden by correlating tax assessment values and market or true values. Tax assessments more closely approximating market values help reduce the number of tax certiorari claims filed against the City. (See "Litigation" herein). For the 2021-22 fiscal year taxable assessments for City Purposes was \$3,864,574,684.

The ORPTS establishes State equalization rates for the City and all localities in the State which are determined by statistical sampling of market sales/assessment studies. Such rates are used to calculate and distribute certain State aids and are used by many localities to calculate debt contracting and real property taxing limitations. The debt and real property tax limitations are based on a percentage of average full valuation.

In response to a Court decision that reduced the tax levies proposed for the fiscal 1978-79 of certain cities and school districts, including the City, the State Legislature authorized the use of special equalization ratios to compute tax and debt limitations for those affected entities. Special equalization ratios are based upon a trend of market sales/assessment studies. The special equalization ratios applied to the prior years' assessments are recalculated each year by ORPTS.

The following table sets forth the current tax and debt-contracting limitations based upon special equalization ratios and regular equalization rates.

Computation of Constitutional Tax Levying and Debt Contracting Limitations For The Fiscal Year Ending June 30, 2022

	Assessed Valuation ⁽¹⁾	Special	Regular	Full Valuation	Full Valuation
Fiscal	(City & School	Equalization	Equalization	Based Upon	Based Upon
Year	Purposes)	Ratios (2)	Rates (2)	Special Ratios	Regular Rates (3)
2018	\$3,765,536,655	78.84	80.00	\$4,768,312,847	\$4,706,920,818
2019	3,789.755,099	77.47	80.00	4,782,025,362	4,737,193,873
2020	3,815,033,311	73.89	78.00	4,844,486,744	4,891,068,333
2021	3,872,676,099	73.91	75.00	5,039,922,044	5,163,568,132
2022	3,903,193,275	73.20	74.50	5,332,231,250	5,239,185,604
Total Five	e-Year Full Valuation			25,403,150,876	24,737,936,760
Five-Year	r Average Valuation			5,080,630,175	4,947,587,352
Tax Levy	ing Limitation:				
2% of Fi	ve- Year Average Full	Valuation		101,612,604	98,951,747
Debt Con	tracting Limitation:				
	verage Full Valuation			\$457,256,716	\$445,282,862
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City Assessor's Office. Assessed valuations for school tax purposes after giving effect to veterans exemptions which are excluded for City taxes.

(2) Established by the ORPTS. All rates are final.

Source: Constitutional Tax Limit Form for the Year Ending June 30, 2022 and the ORPTS.

Tax Collection and Enforcement Procedures

Collection. Real property taxes levied in the City are comprised of four separate elements: (1) general City purposes, (2) City Purposes, (3) general County purposes, and (4) special County district purposes. Tax levies are established as part of the budget process to balance total appropriations and estimated revenue. Real property taxes, for City and City Purposes are billed to the respective properties as of July 1 of each year but may be paid in four installments due on July 1, October 1, January 1, and April 1. Taxes may be paid without penalty on or before the last day of the month in which the payment is due. Payments made after the due date must include interest at 1 ½% per month computed from July 1. After the tax lien date, interest accrues at a rate of 12% per annum. County taxes are billed on January 1 and may be paid in four installments due on the first days of January, April, July and October. Installment payments may be made without interest until the end of each respective month. Delinquent payments are assessed interest of 1 ½% per month from January 1.

The City is responsible for collecting County taxes levied on properties located in the City. Pursuant to Chapter 690 of the Laws of 1937, as amended, the City remits County taxes only to the extent these taxes are actually collected. The City receives a fee equal to 1% of the County tax for providing this service.

Enforcement. Unpaid real property taxes are enforced in accordance with the provisions of the City Charter and the City of Syracuse Tax and Assessment Act. The City conducts tax lien sales for delinquent City taxes in October and a sale is conducted each April for delinquent County taxes levied on properties within the City. A lien is recorded for

⁽³⁾ The City must use full valuations based on special equalization ratios to compute its constitutional tax and debt limits. Tax and debt limits determined with the City's regular equalization rates are provided only for financial analysis purposes.

the amount of unpaid tax plus penalties and interest. It is the City's practice to acquire 100% of the tax liens offered at the sale. The City may institute tax foreclosure procedures one year after a tax lien certificate has been filed (see "Litigation, Contingencies and Regulatory Matters" herein). The City has held a number of tax auctions since 1996 to dispose of properties acquired by foreclosure. The City conducted its latest tax lien auction on February 2008 and realized approximately \$1.6 million. The City solicited bids in April 2009 for the bulk sale of tax liens, but opted not to make an award.

Land Bank. Greater Syracuse Property Development Corporation - The City of Syracuse and County of Onondaga entered into an inter-municipal agreement on March 27, 2012 to create the Greater Syracuse Property Development Corporation, a not-for-profit corporation, operating as the Greater Syracuse Land Bank (Land Bank) under the New York Land Bank Act of 2011. The purpose of the Land Bank is to address problems regarding vacant and abandoned property in a coordinated manner and to further foster the development of such property and promote economic growth through the return of vacant, abandoned, and tax-delinquent properties to productive use. The City and County, while under no obligation, may contribute to the annual Land Bank budget in such manner agreed upon. For fiscal years ended June 30, 2013 through June 30, 2017, the Common Council approved funding agreements with the Land Bank for up to \$1,500,000. The Land Bank is a discretely presented component unit of the City as it is fiscally dependent upon it and there is a financial benefit/burden relationship. The Land Bank has a fiscal year which ends December 31.

There was no funding agreement for the year ended June 30, 2018. The Common Council approved an agreement with the Land Bank for the \$750,000 for the year ending June 30, 2019. The budget allocated \$500,000, \$750,000, and \$750,000 to the Land Bank for the years ended June 30, 2021, 2022, and 2023 respectively.

Real Property Tax Statistics (2018-2022)

	2018	2019	2020	2021	2022
Assessed Valuations	\$3,765,536,655	\$3,789,755,099	\$3,815,033,311	\$3,872,676,099	\$3,903,193,275
Tax Levy: (3)					
General City School District	\$ 31,395,507 59,478,213 \$ 90,873,720	\$ 31,759,307 60,128,067 \$ 91,887,374	\$ 33,816,914 60,995,734 \$ 94,812,648	\$ 35,261,880 60,995,734 \$ 96,257,614	\$ 36,069,763 62,442,659 \$ 98,512,422
Tax Collections:					
Current Year Prior Years	\$ 85,286,103 3,689,641 \$ 88,975,744	\$ 87,106,844 4,421,141 \$ 91,527,985	\$ 86,690,655 3,507,000 90,197,655	\$ 89,860,511 3,220,362 \$93,080,873	\$ 91,736,975 ⁽⁴⁾ 4,493,238 ⁽⁴⁾ \$96,230,213
% Taxes Collected:					
Current Taxes Total Collections	95.85% 94.34% 100.72% 98.16%		89.50% 93.35% 91.67% 96.70%		93.12% ⁽⁴⁾ 97.68% ⁽⁴⁾
Tax Rates Per \$1,000 A.V.:					
General City School District County	\$ 9.26 17.35 12.37 \$38.98	\$ 9.26 17.35 12.12 \$38.73	\$ 9.75 17.40 12.36 \$39.53	\$ 10.01 17.15 11.46 \$38.62	\$10.13 17.15 11.46 \$38.74

Unpaid	Taxes
June 30):

Current: City and School County (1)	\$3,766,876 34,886,234	\$5,196,719 35,681,882	\$6,240,798 35,319,972	\$7,006,663 34,661,729	N/A N/A
Noncurrent:					
City	30,092,634	29,865,192	30,316,908	31,746,532	N/A
County	14,567,685	13,521,759	12,426,085	12,299,803	N/A
Allowance for Uncollectible					
Taxes (2)	(26,520,689)	(26,045,995)	(28,653,368)	(29,667,736)	N/A
•	<u> </u>		<u> </u>	 	
Net Tax Receivables	\$56,792,740	\$58,219,557	\$55,650,395	\$56,046,991	N/A

⁽¹⁾ City accounts for County tax receivables in the Trust and Agency Fund. The current amount of County taxes receivable represents amounts due to the County for taxes levied on January 1 of each year.

Tax collections as of May 18, 2022

Source: City Officials

Matters Affecting Real Property Taxes

STAR Program. Pursuant to Chapter 389 of the Laws of 1997, a State program to reduce school taxes for primary residences was created. The program is called School Tax Relief ("STAR") and provides property exemptions for primary residences. STAR consists of an "enhanced" program for senior citizens meeting certain age and income requirements and a "basic" program that applies to all other primary-residence homeowners with qualifying incomes. Homeowners participating in the enhanced STAR program received an exemption of \$35,580 in fiscal 2021-2022. The minimum exemption may be increased to account for regional differences in home values. Under the basic STAR program, City homeowners received a full value exemption of \$15,080 for the 2021-22 fiscal year. In 2016 NYS changed to a refund check for the STAR benefit instead of an exemption from property tax bill. Homes purchased after 2016 can only have the refund check, and the refund check is available on a voluntary basis to owners who still qualify for the STAR exemption.

The full value exemption granted to primary residence homeowners is converted to an equivalent assessed valuation for purposes of levying taxes for school purposes. Revenue losses attributable to STAR are the product of multiplying the school tax rate (calculated without regard to the STAR exemptions) by the aggregate assessed value of all STAR exemptions. Tax revenue reductions associated with the STAR program in the State's largest cities (including the City) will be divided between the City and the City School District. In the case of the City, the revenue loss will be allocated one third to the City and two-thirds to the School District. The State reimburses schools (and certain cities including the City) for any tax revenue shortfall due to the operation of the STAR program. Reimbursements are made between October and February within the same fiscal year that the taxes are levied.

Allowance for uncollectible taxes applies only to City tax receivables.

Net of STAR exemptions: 2014-15 (\$9,833,619), 2015-16 (\$9,851,775), 2016-17 (\$9,458,703), 2017-18 (\$8,926,822), 2018-19 (\$8,549,597), 2019-20 (\$8,395,921), 2020-21 (\$8,522,950), and 2021-22 (\$7,126,513)

Ten of the Largest Taxpayers

Larger Real Property Tax Assessments 2021-22 Assessment Roll

Nature of Business	Taxable Assessed Valuation (1)	Percentage Total Taxable Assessed Valuations (2)
Utility	\$176,691,861	3.62%
Office Building	18,050,000	0.37%
Office Building	13,570,000	0.28%
Hotel	12,500,000	0.26%
Office Building	12,000,000	0.25%
Office Building	11,500,000	0.24%
Office Building	11,500,000	0.24%
Office Building	11,500,000	0.24%
Utility	11,104,276	0.23%
Utility	10,471,502	0.21%
	\$ 289,887,639	5.94%
	Business Utility Office Building Office Building Hotel Office Building Office Building Office Building Utility	Nature of Business Assessed Valuation (1) Utility \$176,691,861 Office Building 18,050,000 Office Building 13,570,000 Hotel 12,500,000 Office Building 12,000,000 Office Building 11,500,000 Office Building 11,500,000 Office Building 11,500,000 Utility 11,104,276 Utility 10,471,502

- Assessed value reflects parcels with a taxable amount.
- (1) (2) Taxable assessed valuations for City and School purposes are \$3,864,574,684 and \$3,903,158,925, respectively, for the 2021-22 fiscal

City Officials Source:

CITY INDEBTEDNESS

Property in the City is also subject to assessment and taxation on account of a proportionate share of the debt of the County and several County special districts. The State Constitution and the Local Finance Law limit the power of the City (and all other municipalities of the State) to issue obligations and to otherwise contract indebtedness. Such constitutional and statutory limitations include the following, in summary form, and are generally applicable to the City's obligations.

Constitutional Requirements

The New York State Constitution limits the power of the City (and other municipalities and certain school districts of the State) to issue obligations and to otherwise contract indebtedness. Such constitutional limitations include the following, in summary form, and are generally applicable to the City and its obligations.

Purpose and Pledge. Subject to certain enumerated exceptions, the City shall not give or loan any money or property to or in aid of any individual or private corporation or give or loan its credit to or in aid of any of the foregoing or any public corporation.

The City may contract indebtedness only for a City purpose and shall pledge its faith and credit for the payment of principal of and interest thereon.

Payment and Maturity. Except for certain short-term indebtedness contracted in anticipation of taxes or to be paid within three fiscal year periods, indebtedness shall be paid in annual installments commencing no later than two years after the date such indebtedness shall have been contracted and ending no later than the periods of probable usefulness of the objects or purposes determined by statute or the weighted average period of probable usefulness thereof; no installment may be more than fifty per centum in excess of the smallest prior installment, unless the City has authorized the issuance of indebtedness having substantially level or declining annual debt service. The City is required to provide an annual appropriation for the payment of interest due during the year on its indebtedness and for the amounts required in such year for amortization and redemption of its serial bonds, bond anticipation notes and capital notes.

Debt Limit. The City has the power to contract indebtedness for any City purpose so long as the principal amount thereof shall not exceed seven per centum of the average full valuation of taxable real estate of the City, subject to certain enumerated exclusions and deductions such as water and certain sewer facilities and cash or appropriations for current debt service. The constitutional method for determining full valuation is by taking the assessed valuation of taxable real estate for the last completed assessment roll and applying thereto the rate which such assessed valuation bears to the full valuation as determined by the State Office of Real Property Tax Services (the "ORPTS"). The State Legislature is required to prescribe the manner by which such rate shall be determined. Average full valuation is determined by taking the sum of the full valuations of such last completed assessment roll and the four preceding assessment rolls and dividing such sum by five.

Statutory Procedure

In general, the State Legislature has authorized the power and procedure for the City to borrow and incur indebtedness subject, of course, to the constitutional provisions set forth above. The power to spend money, however, generally derives from other law, including the City Law and the General Municipal Law.

Pursuant to the Local Finance Law, the City authorizes the incurrence of indebtedness, including bonds and bond anticipation notes issued in anticipation of such bonds, by the adoption of a resolution, approved by at least two-thirds of the members of the City Council, the finance board of the City. Certain such resolutions may be subject to permissive referendum, or may be submitted to the City voters at the discretion of the City Council.

The Local Finance Law also provides for a twenty-day statute of limitations after publication of a bond resolution (in summary or in full), together with a statutory notice which, in effect, estops thereafter legal challenges to the validity of obligations authorized by such bond resolution, except for alleged constitutional violations. The City has complied with such procedure for the validation of the bond resolution adopted in connection with this issuance.

Each bond resolution usually authorizes the construction, acquisition or installation of the object or purpose to be financed, sets forth the plan of financing and specifies the maximum maturity of the bonds subject to the legal (Constitution, Local Finance Law and case law) restrictions relating to the period of probable usefulness with respect thereto.

Each bond resolution also authorizes the issuance of bond anticipation notes prior to the issuance of serial bonds. Statutory law in New York permits notes to be renewed each year provided that principal is amortized and provided that such renewals do not (with certain exceptions) extend more than five years beyond the original date of borrowing. However, notes issued in anticipation of the sale of serial bonds for assessable improvements are not subject to such five year limit and may be renewed subject to annual reductions of principal for the entire period of probable usefulness of the purpose for which such notes were originally issued. (See "Payment and Maturity" under "Constitutional Requirements.")

In addition, under each bond resolution, the City Council may delegate the power to issue and sell bonds and notes to the Commissioner of Finance, the chief fiscal officer of the City.

In general, the Local Finance Law contains similar provisions providing the City with power to issue general obligation revenue anticipation notes, tax anticipation notes, capital notes, deficiency notes and budget notes.

Constitutional Debt-Contracting Limitation

The New York State Office of Real Property Tax Services (the "ORPTS") annually establishes State equalization rates for all assessing units in the State, including the City, which are determined by statistical sampling of market/assessment studies. The equalization rates are used in the calculation and distribution of certain state aids and are used by many localities in the calculation of debt contracting and real property taxing limitations. The City is not subject to a constitutional real property taxing limitation but has a debt contracting limitation equal to seven percent

(7%) of average full valuation (See "Constitutional Requirements, Debt Limit," herein). See "Tax Levy Limitation Law" herein.

The City determines the assessed valuation for taxable real properties. The ORPTS determines the assessed valuation of special franchises and the taxable ceiling of railroad property. Special franchises include assessments on certain specialized equipment of utilities under, above, upon or through public streets or public places. Certain properties are taxable for school purposes but exempt for City purposes.

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The following table presents the debt-incurring power of the City and shows that the City is within its constitutional debt limit (based on special equalization rates as set by the ORPTS).

Statement of Debt Contracting Power As of June 8, 2022

	Amount
Debt Contracting Limitation: (Based on Special Equalization Rates)	\$457,256,716
Gross Indebtedness: Original Issue Serial Bonds	179,626,968
Contract Liability City/County Courthouse Facility (1) Revenue Anticipation Notes Bond Anticipation Notes (2)	971,547 -0- -0-
Total Gross Debt	\$180,598,515
Less Deductions: (3) Water Debt Airport Bonded Debt (4) (5) Current Appropriations To Pay	42,669,740 -0-
Non-Exempt Principal Debt During Remainder of the Fiscal Year Revenue Anticipation Notes Debt Reserve (7)	990,000 -0- 3,242,432
Total Exclusions	\$46,902,172
Net Indebtedness	\$133,696,343
Debt-Contracting Margin	\$323,560,373
Percentage of Debt Limit Exhausted	29.23%

Contract liability represents the City's share of indebtedness issued by the County for a joint City/County courthouse facility. The City has issued the outstanding bond anticipation notes to commence Phase II of the Joint School Construction Board renovation (1) (2) project (see "Services," herein). In the first phase of the renovations, four schools were completely renovated for a total of \$151 million. The second phase of the legislation was approved on October 25, 2013. The new phase II legislation authorizes \$300 million in financing for up to 20 renovation projects. A full copy of the phase II legislation may be obtained by visiting the website of the New York State Assembly (http://assembly.state.ny.us/), or by contacting the City's Municipal Advisor. The Phase II legislation authorized projects to be funded by the City from any available monies or from the proceeds of City obligations issued in anticipation of permanent financing from any source provided under the legislation and the reimbursement to the City of any available monies so advanced or the payment of obligations of the city issued in anticipation of permanent financing (including permanent financing issued through the City of

Syracuse Industrial Development Agency for such purpose).

Based on current estimates, School District officials expect to receive approximately \$35.9 million State building aid for the unamortized (3) portion of outstanding bonds issued for school building improvements. State law, however, makes no provision for the deduction of such aid in determining the City's constitutional debt limitation.

The City may elect to file an application with the Office of the State Comptroller to exclude airport debt as "self-liquidating debt" pursuant to Section 123.00 of the Local Finance Law. Such estimate, however, has not been deducted in the above computation of the City's debt contracting power. If approved, the City will exclude approximately \$36.2 million in bonded airport debt from the above (4) debt calculation.

inc City cinered into a lease agreement with the SRAA, a discretely presented component unit, commencing on March 1, 2014 which is effective for an initial term of forty (40) years. The Authority is required to make rental payments to the City equal to the principal and interest due on Airport-related debt issued by the City. For 2020 the rental payment was \$3,327,850. See "Financial Factors – Airport Enterprise Funds," and "The Syracuse Hancock International Airport," herein.

Debt reserve comprised of funds received from the sale of parking garages, which have outstanding bonds, and reserves for special assessment debt. As of June 8, 2022. (5) The City entered into a lease agreement with the SRAA, a discretely presented component unit, commencing on March 1, 2014 which

(7)

In addition to the City, the County has the power to incur indebtedness payable from property taxes levied on property in the City. The table below sets forth both the total outstanding principal amount of debt issued by the City and the approximate amount of debt issued and outstanding by the County and its special districts which is payable from taxes levied on property situated in the City.

Statement of Direct and Overlapping Debt

Long Term Debt: Bonded Debt Contract Liability: City/County Courthouse Facility Short-Term Debt: Revenue Anticipation Notes Bond Anticipation Notes				\$ 179,626,968 971,547 0 0	\$ 180,598,515	
Gross D	irect	Debt			180,598,515	
Deductions: Water Debt Current Appropriations to Pay Non-Exempt Principal				42,669,740		
Debt Maturing During Remainder of the Fiscal Year Revenue Anticipation Notes Debt Reserve Total Deductions			990,000 0 3,242,432	\$ 46,902,172		
Net Dir					\$ 133,696,343	
Issuing Entity	_	Gross Outstanding Debt	Exclusions	Net Outstanding Debt	Percent Applicable To the City	Net Amount Applicable To the City
Onondaga County	(1)	\$679,014,309	\$361,056,485	\$317,957,824	16.90%	53,734,872
City Net Direct Debt	(2)					133,696,343
Total Net Direct Debt						\$ 187,431,215

⁽¹⁾ (2) As of March 30, 2022

As of June 8, 2022. See "Statement of Debt Contracting Power," herein.

Debt Ratios

The following table sets forth certain debt ratios based upon the City's Statement of Direct and Overlapping Debt.

Debt Ratios As of June 8, 2022

	Debt Amount	Per Capita (1)	Debt To Estimated Full Value of Taxable Property ⁽²⁾
Net Direct Debt	\$133,696,343	\$899	2.55%
Net Direct and Overlapping Debt	187,431,215	1,261	3.57%

According to interim data obtained from the U.S. Census Bureau (American Community Survey – 5 Year Estimate), the 2020 population of the City was 148,620 of the City for the 2021 fiscal year,
 based upon regular equalization rates, is \$5,239,185,604.

Debt Service Schedule

The following table shows the debt service requirements to maturity on the City's outstanding general obligation bonds as of June 8, 2022.

Schedule	of Debt	Service	Rea	uirements
Schodule	OI DCOL	DOI VICE	1104	uncincino

Years Ending June 30:	Principal	Interest (1)	Total	Cumulative Principal Paid
2022	\$ 990,000	\$ 77,250	\$ 1,067,250	0.55%
2023	23,631,968	6,226,158	29,858,126	13.71%
2024	19,575,000	5,298,677	24,873,677	24.60%
2025	15,940,000	4,549,559	20,489,559	33.48%
2026	14,880,000	3,974,659	18,854,659	41.76%
2027	14,665,000	3,432,026	18,097,026	49.93%
2028	12,095,000	2,905,438	15,000,438	56.66%
2029	11,805,000	2,490,504	14,295,504	63.23%
2030	11,465,000	2,083,083	13,548,083	69.61%
2031	10,355,000	1,711,345	12,066,345	75.38%
2032	8,525,000	1,368,017	9,893,017	80.13%
2033	7,000,000	1,082,918	8,082,918	84.02%
2034	5,880,000	850,300	6,730,300	87.30%
2035	4,835,000	660,522	5,495,522	89.99%
2036	3,945,000	512,487	4,457,487	92.18%
2037	3,065,000	397,341	3,462,341	93.89%
2038	3,105,000	299,080	3,404,080	95.62%
2039	3,150,000	199,644	3,349,644	97.37%
2040	3,205,000	98,801	3,303,801	99.16%
2041	1,515,000	30,300	1,545,300	100.00%
	\$179,626,968	\$38,248,109	\$217,875,077	

The City expects to receive an interest rate subsidy of \$1,472,057.88, including a total of \$240,777 in fiscal 2021-22, from the State Drinking Water Revolving Fund from fiscal 2021 through 2031. Such subsidy is not deducted from the annual interest payments presented in the

Trend of Bonded Indebtedness

The following table sets forth the gross bonded principal indebtedness outstanding at the end of each of the last seven completed fiscal years.

Bonded Debt (1) Fiscal Years Ended June 30:

Fiscal Year	General City	City School District	Airport	Parking	Water And Sewer	Total Bonded Debt
2015	\$102,537,150	\$51,531,657	\$48,560,000	\$1,033,614	\$71,273,189	\$274,935,610
2016	100,639,736	45,401,406	44,610,000	959,609	68,745,589	260,356,340
2017	102,728,463	42,585,746	41,005,000	893,588	64,635,043	251,847,840
2018	103,351,173	34,590,561	39,370,000	822,654	60,291,612	238,426,000
2019	101,536,357	27,936,697	37,370,000	748,342	54,775,604	222,367,000
2020	102,204,667	23,189,000	36,170,000	669,116	54,213,217	216,446,000
2021	135,881,657	18,277,000	34,480,000	586,206	49,355,646	238,580,509
2022	123,474,748	14,277,000	-0-	498,383	65,975,220	204,225,351

⁽¹⁾ Excludes refunded debt obligations and JSCB obligations.

Installment Purchase Contracts

The City from time-to-time acquires or constructs capital assets pursuant to financing leases or installment purchase contracts as such leases are described under State law. Under State law, installment purchase contracts are deemed to be executory only to the extent that moneys have been appropriated and are available therefore. Such contracts do not constitute general obligations of the City secured by a faith and credit pledge of the City's taxing powers. However, installment purchase contracts are considered to be chargeable debt for purposes of computing the City's debt limitation prescribed by Section 104.00 of the Local Finance Law. The total amount of periodic payments, exclusive of interest, due on installment purchase contracts may not exceed 40% of the City's constitutional debt limit. Such obligations presently represent approximately less than 0.01% of the City's maximum debt authority.

The City currently has no outstanding installment purchase contracts.

Contract Liability

The City has contracted with the County of Onondaga in connection with the construction of a new courthouse and for certain parking garage projects. Serial Bonds were issued in order to fund the aforementioned projects and the City has assumed responsibility for a portion of such debt. As of May 16, 2022, the City had a remaining balance of \$466,847 for its portion of assumed debt. The bonds mature serially on May 1 and November 1 through May 1, 2023. The following table presents the City's outstanding liability for the bonded debt through the final maturity date.

Contract Liability (City Portion) 2022 – 2023 (CALENDAR YEAR)

Calendar Year	Parking Garage	New Courthouse	Total
2023	\$69,120	\$397,727	\$466,847
Total:	\$69,120	\$397,727	\$466,847

Short-Term Indebtedness

Pursuant to the Local Finance Law, the City is authorized to issue short-term indebtedness, in the form of notes as specified by such statute, to finance both capital and operating purposes.

Capital Purposes. Bond anticipation notes may be sold to provide moneys for capital projects once an enabling bond ordinance has been adopted. Generally, bond anticipation notes are issued in the anticipation of the sale of bonds at some future date and may be renewed from time to time but in general, may not be renewed beyond the fifth anniversary of their original issuance. Notes may not be renewed after the second year unless there is a principal payment on such notes from a source other than the proceeds of the bonds. Bond anticipation notes may not be renewed after the sale of bonds in anticipation of which the notes were originally issued. Capital notes may be issued to finance any capital purposes. The term for capital notes is generally limited to two years.

In the first phase of the renovations, four schools were completely renovated for a total of \$151 million. The second phase of the legislation was approved on October 25, 2013. The new phase II legislation authorizes \$300 million in financing for up to 20 renovation projects. A full copy of the phase II legislation may be obtained by visiting the website of the New York State Assembly (http://assembly.state.ny.us/), or by contacting the City's Municipal Advisor. The JSCB will later reimburse the City for such funds. See "Joint Schools Construction Board - Phase I," and "Joint Schools Construction Board – Phase II," herein.

The following table presents a history of the bond anticipation notes outstanding at the end of the City's last six completed fiscal years.

Bond Anticipation Notes (1) Fiscal Years Ended June 30:

Fiscal	General	City School			Water	
Years	City	District	Airport	Parking	And Sewer	Total
2015	\$ -0-	\$ 2,000,000 (2)	\$ -0-	\$ -0-	\$ -0-	\$ 2,000,000
2016	-0-	7,905,000 (2)	-0-	-0-	-0-	7,905,000
2017	-0-	29,800,000 (2)	-0-	-0-	-0-	29,800,000
2018	-0-	15,000,000 (2)	-0-	-0-	-0-	15,000,000
2019	-0-	$23,000,000^{-(2)}$	-0-	-0-	-0-	23,000,000
2020	-0-	-0- (2)	-0-	-0-	-0-	-0-
2021	-0-	- 0 - ⁽²⁾	-0-	-0-	-0-	-0-

- For the 2021 fiscal year, as of June 30, 2021, the total amount of outstanding bond anticipation notes was \$0. The notes were issued for Joint Schools Construction Board Purposes. See "Joint Schools Construction Board Phase II," herein.

Operating Purposes. The City is authorized by law to issue tax anticipation notes and revenue anticipation notes to provide cash to pay operating expenditures. Borrowings for this purpose are restricted by formulas contained in the Local Finance Law and the regulations issued under the Internal Revenue Code of 1986, as amended. Such notes may be renewed from time-to-time but generally not beyond three years in the case of revenue anticipation notes, and five years for tax anticipation notes. Budget notes may be issued to finance current operating expenditures for which there is no appropriation or the amount so appropriated is not sufficient. Generally, the amount of budget notes issued during the year may not exceed 5% of the budget and must be redeemed in the next fiscal year.

The following table shows the City's cash flow borrowing activity during the last five completed fiscal years and as of June 8, 2022 for the current fiscal year.

Revenue and Tax Anticipation Notes Fiscal Years Ended June 30:

		Notes		
Fiscal Years	Balance July 1 st	Revenue Anticipation	Tax Anticipation	Balance June 30 th
2016	-0-	\$82,705,000	-0-	-0-
2017	-0-	103,439,000	-0-	-0-
2018	-0-	95,705,000	-0-	43,900,000
2019	-0-	75,044,000	-0-	-0-
2020	-0-	111,680,000	-0-	72,064,000
2021	-0-	137,967,000	-0-	85,967,000
2022	-0-	10,770,000	-0-	-0-

(1) As of June 8, 2022.

For fiscal 2021, the District issued \$85,967,000 of revenue anticipation notes.

Capital Financings and Debt Authorizations

Recent Capital Financings – City Purposes. The City last issued serial bonds on June 30, 2021. On this date the City issued \$47,916,968 Public Improvement (Serial) Bonds, Series 2021. Such bonds sold at true interest rate of 1.86%. The 2021A bonds mature on May 15 of each year from 2022 through 2041.

Recent Capital Financings – JSCB Purposes. Pursuant to Chapter 50, Pt.A-4, of the Laws of 2006 of the State of New York (the "Syracuse Schools Act"), the Syracuse Joint Schools Construction Board ("JSCB") is undertaking to improve seven school buildings. The JSCB retained the Gilbane Building Company, a privately held family run construction company founded in 1873 in Providence, Rhode Island, to be the independent program/construction management firm for Phase I of the Program, and to assist in the management of Phase I of the Program under the supervision of the City Engineer. The JSCB previously issued \$156,820,000 principal amount of project bonds to finance or refinance the costs of the Phase I Project as follows:

Date of Issue	Name of Issue
March 26, 2008	\$49,230,000 School Facility Revenue Bonds (Syracuse City School District Project) Series 2008A
December 23, 2010	\$31,470,000 School Facility Revenue Bonds (Syracuse City School District Project) Series 2010
July 12, 2011	\$31,860,000 School Facility Revenue Bonds (Tax Exempt Bonds) (Syracuse City School District Project) Series 2011A
	\$15,000,000 School Facility Revenue Bonds (Federally Taxable Qualified School Construction Bonds) (Syracuse City School District Project) Series 2011B
April 20, 2017	\$29,260,000 School Facility Revenue Refunding Bonds (Syracuse City School District Project) Series 2017

The JSCB selected Turner Construction Company as the Program Manager for Phase II of the Program on August 28, 2015. The Issuer has previously issued \$278,170,000 principal amount of Project Bonds to finance a portion of the Phase II Project as follows:

Date of Issue	Name of Issue
March 15, 2018	\$67,265,000 aggregate principal amount of its School Facility Revenue Bonds (Syracuse City School District Project) Series 2018A
June 20, 2018	\$38,500,000 aggregate principal amount of its School Facility Revenue Bonds (Syracuse City School District Project) Series 2018B
April 11, 2019	\$65,435,000 aggregate principal amount of its School Facility Revenue Bonds (Syracuse City School District Project) SERIES 2019B
March 3, 2020	\$80,530,000 aggregate principal amount of its School Facility Revenue Bonds (Syracuse City School District Project) SERIES 2020A
February 1, 2021	\$26,440,000 aggregate principal amount of its School Facility Revenue Refunding Bonds (Syracuse City School District Project) SERIES 2021A

Debt Authorizations. The City has authorized but unissued debt of approximately \$190.7 million. Such authorizations include approximately \$141.7 million for general City purposes, \$20.0 million for the JSCB, \$5.7 million for airport purposes, \$1.5 million for water purposes, \$13.9 million for street and sidewalk improvements, \$0.9 million for sewer purposes, and \$7.1 million for street lighting.

Capital Budget

The City prepares a six-year capital program in accordance with the provisions of Section 99-g of the General Municipal Law. Under Section 6-108 of the City Charter, the Budget Director of the Office of Management and Budget is responsible for compiling the capital budget. For each project, the budget document contains a complete description of the undertaking together with its estimated cost, a justification of the proposed expenditure, and the sources of financing for the project. The Common Council considers the capital budget in conjunction with any proposed capital project, however, there is no requirement that the Common Council actually approve such budget. The capital budget notwithstanding, the Council is required to authorize the expenditure of moneys for capital purposes by the adoption of a capital appropriations ordinance.

A summary of the City's current capital budget is presented below. The budget includes the capital spending for six fiscal years ending June 30, 2028. The plan emphasizes the restoration and preservation of the infrastructure of the City, improvements to City owned buildings and the acquisition or replacement of vehicles and equipment. The plan continues the commitment of previous plans to systematically rehabilitate the City's water system, bridges, roads, schools, parking garages, parks, and airport runways and taxiways. During this period of time, the City proposes to spend approximately \$446 million for various public City and School District improvements.

The capital improvement costs are expected to be financed by issuing debt in the amount of approximately \$106.2 million of City general obligations debt. Federal and State grants proposed primarily for airport projects, street and bridge improvements, and various other community programs are expected to contribute approximately \$376.6 million. Cash contributions from operating funds are expected to be used to pay for approximately \$51.1 million of capital expenditures.

The below table summarizes the City's Capital Improvement Plans for the fiscal years ending June 30, 2023 through 2028 by the method of finance.

Capital Improvement Plan & Method of Financing - Fiscal Years 2023 - 2028

Year				Method of Financing			
Endi		School					
ng June 30:	City	District	Total	Cash	Debt	Other	Total
2023	\$108,044,019	\$18,500,000	\$126,544,019	\$21,277,440	\$38,708,942	\$66,557,637	\$126,544,019
2024	93,935,470	5,600,000	99,535,470	13,764,100	29,449,840	56,321,530	99,535,470
2025	53,212,000	1,500,000	54,712,000	10,239,800	24,447,120	20,025,080	54,712,000
2026	62,522,154	1,500,000	64,022,154	8,421,454	29,053,740	26,546,960	64,022,154
2027	51,838,418	0	51,838,418	11,566,018	15,330,480	24,941,920	51,838,418
2028	49,309,498	0	49,309,498	12,215,548	13,552,030	23,541,920	49,309,498
_	418,861,559	\$27,100,000	\$445,961,559	\$77,444,360	\$150,542,152	\$217,935,047	\$445,961,559

Source: The 2022-23 Capital Improvement Program of the City of Syracuse for the fiscal years 2022-23 through 2027-28.

The below table summarizes the City's Capital Improvement Plans for the fiscal years ending June 30, 2023 through 2028 by department.

Capital Improvement Plan - By Purpose (Fiscal Years 2023 - 2028)

\$47,044,050
32,471,251
18,999,720
126,943,098
98,903,300
9,070,000
56,498,000
28,932,140
27,100,000
\$445,961,559

Source: The 2022-23 Capital Improvement Program of the City of Syracuse for the fiscal years 2022-23 through 2027-28.

ECONOMIC AND DEMOGRAPHIC DATA

Population

Like many other large cities nationwide, the City has experienced a declining population since 1960. The County's population peaked in 1970 and has remained below that level since that time. The Syracuse Metropolitan Statistical Area (MSA) increased steadily from 1960 through 1990 and from 2000 through 2010, reflecting the migration of the urban population to the suburbs, but showed a decline from 1990 to 2000. Information estimated as of July 1, 2019 (Annual Estimates of the Residential Population: April 1, 2011 to July 1, 2019, US Census Bureau, has also been included.

Population

Year	City	County	Syracuse MSA ⁽¹⁾	State
1960	\$216,038	\$423,028	\$637,723	\$16,782,304
1970	197,297	472,835	714,035	18,241,266
1980	170,105	463,920	722,868	17,558,072
1990	163,860	468,973	742,178	17,990,455
2000	147,306	458,336	732,117	18,976,457
2010	145,170	467,026	742,583	19,378,102
2020	148,620	476,516	738,305	20,201,249
2020	148,620	476,516	738,305	20,201,249

⁽¹⁾ Includes Onondaga, Madison, Oswego and Cayuga Counties.

Source: U.S. Department of Commerce, Bureau of the Census.

Income

Per Capita Money Income - 2019

	2010	2019	% Change
City	\$17,866	\$23,090	22.6%
County	27,037	34,002	20.4%
State	30,948	39,326	21.3%

Source: U.S. Department of Commerce, Bureau of the Census (American FactFinder). American Community Survey 5-Year Estimate.

Median Income of Families – 2019 Income Groups – % of Families

		Income Groups - % of Families						
	Median	Under	\$25,000	\$50,000	\$75,000	\$100,000		
	Income	\$25,000	-49,999	-74,999	-99,999	or More		
City	\$38,276	35.4	26.3	14.7	9.3	14.4		
County	61,359	20.3	20.8	17.7	13.0	28.2		
State	68,486	12.8	16.7	15.3	13.0	42.2		

Source: U.S. Department of Commerce, Bureau of the Census (American FactFinder). American Community Survey 5-Year Estimate.

Employment

The following tables provide certain information about the labor force in the City and the Syracuse MSA, respectively.

Average Employed Civilian Labor Force 2000 - 2020

(In Thousands)

	2000	2010	2020	% Change 2000-2010	% Change 2010-2020
City	64.8	63.4	59.4	(7.8)%	(9.1)%
•	323.6	331.7	305.1	` /	` /
Syracuse MSA				(2.5)	(6.1)
County	230.1	237.2	220.5	3.1	(4.4)
State	9,140.5	9,630.3	9,289.2	5.4	1.6

Source: The New York State Labor Department.

Annual Employment by Industry Syracuse MSA 2020 Annual Census of Employment

	Total Employees (000's) (1)	Percent Total
		0.760/
Agriculture, Forestry, Fishing and Hunting	1,564	0.56%
Mining	206	0.07%
Utilities	4,025	1.45%
Construction	11,979	4.32%
Manufacturing	24,356	8.78%
Wholesale Trade	11,111	4.01%
Retail Trade	30,613	11.04%
Transportation and Warehousing	9,160	3.30%
Information	3,567	1.29%
Finance and Insurance	9,833	3.55%
Real Estate and Rental and Leasing	3,516	1.27%
Professional and Technical Services	15,235	5.49%
Management of Companies and Enterprises	4,479	1.61%
Administrative and Waste Services	12,917	4.66%
Educational Services	11,844	4.27%
Health Care and Social Assistance	41,480	14.95%
Arts, Entertainment, and Recreation	2,622	0.95%
Accommodation and Food Services	18,639	6.72%
Other Services, Ex. Public Admin	8,539	3.08%
Unclassified	230	0.08%
Total - Private	225,916	81.45%
Government	51,459	18.55%
Total – All Sectors	277,375	100.00%

(1) Due to rounding, detail may not add to totals.

Source: The New York State Department of Labor (2020 Annual Census of Employment and Wages).

Average Unemployment Rates (1)

	e.		Syracuse	~	United
Year	City	County	MSA	State	States
2016	5.9%	4.5%	4.9%	4.9%	4.9%
2017	6.1	4.7	5.1	4.7	4.4
2018	5.3	4.0	4.3	4.1	3.9
2019	5.2	3.9	4.3	3.8	3.7
2020	11.5	8.4	8.6	10.0	8.1
2021	7.4	5.2	5.3	7.2	
Jan 2021 (2)	10.0	7.1	7.2	9.4	6. 3
Feb	9.8	7.2	7.4	9.7	6.2
Mar	8.5	6.4	6.6	8.4	6.0
April	7.4	5.5	5.6	7.7	6.1
May	6.9	5.0	5.0	7.0	5.8
June	7.5	5.4	5.4	7.2	5.9
July	8.1	5.5	5.5	7.4	5.4

August	7.8	5.3	5.3	7.1
September	6.7	4.4	4.4	6.3
October	6.3	4.2	4.3	5.9
November	5.5	3.8	3.9	5.5
December	3.8	2.9	3.0	5.0

- Rates are not seasonally adjusted.
- (1) (2) Monthly Rates.

Source: New York State Labor Department and U.S. Bureau of Labor Statistics.

Unemployment rates have been, and are likely to continue to be, adversely impacted by the COVID-19 pandemic

Onondaga County 5 Larger Employers - 2019

Employer	Industry	Employees
SUNY Upstate Medical University St. Joseph's Hospital Health Center Syracuse University Crouse Health	Academic Medical Center Medical and Health Care Facility Higher Education Medical and Health Care Facility	7,275 4,781 4,623 3,300
National Grid	Utilities	2,500
Total Employees		22,479

2019 Business Journal News Network Book of Lists.

Educational, Cultural and Medical Institutions

Syracuse University, LeMoyne College, Onondaga Community College, SUNY College of Environmental Science and Forestry, and SUNY Upstate Medical University are located in or in close proximity to the City. The aforementioned institutions of higher learning have a combined student population of approximately 38,500 (undergraduate and graduate students). Professional and non-professional employment at these institutions exceeds 11,000.

Syracuse University offers a special program designed to benefit students of the City School District. Prior to commencing the eighth grade, any student may enter into an agreement with the University which guarantees their enrollment in the University following graduation. Acceptance is subject to certain academic requirements. Students will receive tutoring, free of charge, while in high school. Financial aid for college expenses will be provided to any student in need of such assistance.

Cultural. Several museums are located in the City. The newest is the Everson Museum of Fine Arts located near the Onondaga County Civic Center.

The Civic Center-County Building Complex houses County government operations, but this facility also serves as a gathering place and public forum for many of the social, educational, business and other activities of the community. The County office building portion of such complex consists of sixteen floors with approximately 316,700 square feet of net office space. A restaurant-cafeteria, a communications center and civil defense headquarters are also included. The cultural center consists of 75,000 square feet of performing art facilities, including a 150-seat community meeting room, a 480-seat theater and a 2,100 seat multi-purpose theater for concerts, opera, ballet, conventions and lectures. A convention center, the ONCENTER, encompasses 208,000 square feet, including a 65,000 square foot exhibit hall for trade shows and 22,000 square feet available for conferences. Construction for a conference hotel located on an adjacent site is expected to begin once the financing for this project has been secured. Preliminary estimates place the hotel's cost at \$61.0 million.

Also located within the City are the Syracuse Opera Company, the Syracuse Stage, the Syracuse City Ballet, a class triple-A minor league professional baseball team, and a minor league professional hockey team. Syracuse University fields various NCAA Division One teams including basketball and football. The Carrier Dome is one of the largest indoor sports arenas in the United States and hosts many high profile events. Syracuse University has won 30 national team titles in seven sports, and 49 individual national championships in six sports.

Medical. The City is a regional center for a 15-county area for specialized medical services. Four hospitals: Crouse, University Hospital of the SUNY Upstate Medical University, Veterans Administration Hospital and Hutchings Psychiatric Center, are located adjacent to one another in the university medical complex just east of downtown Syracuse. St. Joseph's Hospital is located to the north of downtown and Upstate Community Hospital is just south of the City. Among these hospitals there are approximately 2,000 beds and more than 1,600 practicing physicians. In addition, the Syracuse area is served by 12 separate extended-care facilities and nursing homes as well as numerous ambulatory facilities.

Financial Institutions

Offices of the following commercial and savings banks are located within the City:

As of June 9, 2020

Name	Number of Offices	Deposits (\$000's)
Commercial Banks:		
Bank of America, N.A.	6	\$ 647,248
Citizens Bank, N.A.	1	76,285
Community Bank, N.A.	1	-0-
JPMorgan Chase Bank, N.A.	6	654,414
KeyBank N.A.	12	1,460,607
Manufacturers and Traders Trust Company	14	2,065,206
NBT Bank, N.A.	6	205,720
Pathfinder Bank	1	56,904
Solvay Bank	5	595,894
Total Commercial Banks:	55	\$ 5,762,278
Savings Banks:		
Geddes Federal Savings Loan	1	\$ 419,121
Seneca Federal Savings Loan	1	31,874
Senera i ederai savings Loan		31,077
Total Savings Banks:	2	\$ 450,995
Total All Banks:	62	\$6,213,273

Source: The Federal Deposit Insurance Corporation.

Transportation

The City is at the juncture of two major transport routes: The State Thruway, extending as Interstate 90 from Boston to Chicago and the West; and Interstate 81, running from Canada to Virginia, connecting via other Interstate highways to Washington D.C. and the South. The State Thruway has six interchanges in close proximity to the City. Interstate 690 forms an east-west axis through the City and Interstate 481 links the City of Fulton with the City and surrounding towns.

A major infrastructure investment is anticipated in the coming years with the reconstruction of Interstate 81. On April 22, 2019, the New York State Department of Transportation (NYSDOT) released a preliminary Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS) in advance of FHWA review for the Interstate 81 Viaduct Project. The draft report recommends the removal of major portions of the elevated I-81 system that run between the University Hill and downtown. The proposed community grid approach is expected to alleviate traffic congestion and reduce accidents along the busiest parts of I-81. In 2021, the State of New York committed \$800M to the first phase of the I-81 project, and an overall investment of more than \$2B is expected for the full scope of the highway project.

The City is served by railroad facilities of CSX consisting of the two main lines formerly operated by Penn Central and Erie Lackawanna Railroads, as well as by several interstate trucking companies which maintain terminals within the City. CSX operates an intermodal center in the County for handling freight shipped in containers or truck trailers. The Syracuse Hancock International Airport, which is owned and operated by the City, has signatory agreements with the following commercial airlines: Delta, Jet Blue, US Airways, American Eagle, United Airlines dba United Express, and Express Jet (Continental). United Airlines and Continental merged operations. In addition the following commuter airlines provide regular service: Comair, ASA, Freedom, Mesa, Colgan, Piedmont, Chautauqua, Republic, Transtates, Gojet and Skywest. Air cargo carriers Federal Express and UPS have signatory agreements to utilize the Airport. Rail passenger service is provided by Amtrak. Bus service is provided by three independent carriers in addition to "Centro" operated by the Regional Transportation Authority.

Water transportation is provided by the State owned and operated Barge Canal System, which takes advantage of canals and existing lakes and streams to provide commercial and recreational water transportation. The system, in connection with the Hudson River, allows water travel from New York City through Syracuse to Buffalo and Lake Erie.

Communications

The Syracuse Post Standard publishes a daily newspaper; including a Sunday edition. The four major TV networks, ABC, CBS, NBC and Fox have affiliates in the City. In addition, CW has an affiliate broadcasting from the City. The Public Broadcasting Station is WCNY-TV 24. Time-Warner Cable provides cable TV and media services to City residents. There are also various AM and FM radio stations serving the City.

Utilities

National Grid Company is the major supplier of electric power and natural gas to area industry, commercial and residential consumers.

Verizon is the primary supplier of telephone service in the City. Other telecommunication companies serving City residents include, among others: AT&T, Sprint and Spectrum.

In 2019, the City approved an agreement with Verizon Wireless for a city-wide 5G network implementation. As of early 2021, more than 100 5G small cell sites have been installed and activated in the City, making Syracuse the first city in Upstate New York with Ultra Wideband 5G service. Ultra Wideband is estimated to double download speeds and eventually handle data volumes 100 times larger than today's 4G service. In 2020, the City entered into a similar agreement with AT&T.

The City operates its own drinking water system. The primary source of water for City residents is Skaneateles Lake, one of the Finger Lakes. Skaneateles Lake is part of an interconnected system which also includes Otisco Lake and

Lake Ontario, providing an almost limitless supply of water to the area. The City participates in a filtration avoidance program which requires strict management of watersheds. The City has contracted with a consulting firm to review all aspects of the water operations including quality control and security issues affecting the City's water supply system. Under the City's latest capital improvement plan, \$7.1 million is provided for improvements to the Skaneateles Water Supply System.

In addition, the City also operates its own sewer collection system, which is part of a comprehensive sewage treatment system operated by the County. There are currently 12 sewage treatment plants and 80 pumping stations in the Syracuse area, capable of handling over 114 million gallons of sewage daily.

The County will construct three new sewage treatment plants within the City as part of a program to remediate Onondaga Lake. The City has asked that the County consider using technology for these plants that would be more compatible with residential areas and the City's planned development of a "Creekwalk" along Onondaga Creek.

Development Activities

The City offers a variety of development programs designed to promote the rehabilitation of its housing stock as well as the creation and retention of job opportunities for its citizens. City sponsored development activity is managed by the Office of Development. The primary objective of the City's development program is to ensure a healthy and stable urban community by providing decent housing, a suitable living environment and expanded economic opportunities, principally for low and moderate-income persons. In accordance with this objective, the program gives priority to activities benefiting such income groups. Program funds benefit low-income and moderate-income persons either directly (for example, home rehabilitation loan assistance) or indirectly, such as through infrastructure improvements in low or moderate - income neighborhoods. The City's five-year objective is to create or retain reasonably priced housing units annually; remove vacant and derelict structures that are not suitable for rehabilitation and that detract from the City's neighborhoods; strategically revitalize the major corridors within neighborhoods and provide services to individuals that promote or foster self-sufficiency.

The City uses various financial incentives to encourage homeowners and businesses to invest in the community. Funding for these programs is provided through a combination of public and private sources including Community Development Block Grants, State and Federal moneys and bank financing. A brief description of the City housing and business or economic development programs follows.

Affordable Housing Development

The goals of the programs administered by the City's Department of Community Development are the rehabilitation and development of housing for low and middle-income families and the revitalization of the City's neighborhoods. The Department works closely with other agencies, such as the Syracuse Housing Authority, neighborhood organizations, and private housing companies to facilitate the development of new housing opportunities.

A particular priority is given to home ownership opportunities. Approximately \$2,099,720 of the City's Community Development Block Grant Funding from the Department of Housing and Urban Development Community Development Block Grant ("CDBG") is allocated to Home Headquarters. The mission of this not-for-profit organization is to provide a "one stop shop" for low-income owner occupants who are in need of housing support and financing. Programs being offered through Home Headquarters, Inc. include a down payment and closing cost assistance program for first-time home buyers as well as home improvement loans for low-income owner-occupants. The program works in concert with area lending institutions so that federal funds are leveraged to the maximum extent possible.

The City of Syracuse HOME Program sets out to achieve the objective of housing production and is designed to assist investor-owners in making improvements to their rental units. The HOME Program utilizes HOME funds for use by for-profit and nonprofit housing developers, which rehabilitate or newly construct housing for inclusion into their rental management portfolio. The HOME program annually supports the rehabilitation and/or new construction of quality affordable rental units. These development efforts result in the rehabilitation of several affordable units.

For the 2019-20 program year (year 45), approximately \$6.9 million of CDBG, HOME, ESG funds will be allocated to housing activities. This represents a decrease of approximately 2.0% from the 2018-19 fiscal year.

The Department of Community Development works with non-profit developers interested in the construction or renovation of residential units. A multitude of resources are employed including State Affordable Housing funds, low-income housing tax credits, public funding, leveraged private funding, secondary markets, etc.

The Syracuse Neighborhood Initiative, a comprehensive neighborhood revitalization initiative was launched in 1999. This effort to promote and enhance the quality of life in each of the City's 26 neighborhoods received a challenge issued by local Congressman James T. Walsh (R-Syracuse) to revitalize the City's distressed neighborhoods. A partnership was initiated in response to the Congressman's challenge among the City of Syracuse, local and national non-profit community development organizations and private sector leaders. To date more than \$47.1 million has been provided to address specific neighborhood projects, which will have a positive impact in the neighborhood revitalization effort.

The Syracuse Housing Authority presently manages 2,618 units of housing and two single family homes. Of this total, 1,120 (43%) are elderly units and 1,498 (57%) are family units.

The City also works with support service agencies to obtain assistance through the Federal McKinney Act Programs for housing for the homeless and housing vulnerable.

The City's Comprehensive Plan 2025 was completed at the end of 2004. The purpose of this plan is to present a shared vision for the future of the City as well as establish a well-defined set of policies, goals, and recommended actions to implement that vision. The plan provides guidance for maintenance of the City's infrastructure; land use regulations; neighborhood plans; Federal, State and County investments; and public investments. The vision and recommendations of the Comprehensive Plan are expected to augment the City's efforts and collaborative partnerships in working towards the revitalization of the City and its neighborhoods.

Economic Development

The City of Syracuse has seen significant investment and redevelopment across major business districts and neighborhoods over the past decade. One of the most dramatic transformations has been the redevelopment of Franklin Square, resulting from the City's decision to expand the traditional boundaries of its downtown and redevelop an 800-acre waterfront tract adjacent to the Central Business District using its industrial development agency and other development tools. Examples of completed projects include the Lofts at Franklin Square, a mixed use restoration with 90 residential units and 32,000 sq. ft. of commercial space; the Foundry at Franklin Square a \$7,000,000 conversion of the former Glomac Building into 40,000 sq. ft. of commercial space; and the conversion of the former Hurbson Building into 56,000 sq. ft. of Class A office space also at a cost of \$7,000,000. Additionally, Rapid Response, Inc. is embarking on the third expansion of its corporate headquarters, employing several hundred individuals. Additionally, several adaptive reuse projects, creating apartment units and a new manufacturing operation, respectively.

The Pyramid Companies have completed construction of an 800,000 sq. ft. expansion of Carousel Center and renamed the entire complex known as "Destiny USA." (The PILOT agreement related to this development is explained in the "Discussion of Financial Matters-Revenue" section of this document.) The expansion portion of the mall is open and being filled with a mix of retail, restaurant, and entertainment tenants.

For more than two decades, since the development of Carousel Center, the City has placed considerable emphasis on reclaiming land adjacent to the City's waterfront. Through the collective efforts of the project partners, a clean-up plan is in place for Onondaga Lake. In 2020, the City completed the second phase of the Onondaga Creekwalk, which is now five miles of multi-use connected trails running through the center of the City along Onondaga Creek. The trail connects the Inner Harbor with Armory Square in Downtown Syracuse and extends to connect to Kirk Park on the City's southside.

The City's initiatives also include a neighborhood business corridor improvement strategy which emphasizes the retention of existing businesses and revitalization of existing neighborhood commercial areas through structural and

aesthetic improvements. For example, the City launched several Main Street Programs, which have invested \$400,000 and up to \$50,000 per property for improvements along Butternut Circle and South Avenue, which leveraged a 25% private match from the benefiting property owner and/or businesses. Due to the program's success, SEDCO (the Syracuse Economic Development Corporation) and the City of Syracuse staff are expanding funding opportunities to eligible business districts city-wide. Direct benefits of neighborhood business assistance programs include increased private-investment business activity, employment, and the strengthening of surrounding neighborhoods.

The industrial/commercial strategy focuses on preserving the City's industrial base by promoting the expansion and retention of existing local firms. The City works with a range of financing and business incentive programs offered by various local, state, and federal economic development agencies. A pharmaceutical manufacturer on the City's Near Westside was recently approved by New York State and the Syracuse Industrial Development Agency for a \$60 million facility expansion. Emphasis continues to be placed on packaging business development loans through the Syracuse Economic Development Corporation (SEDCO) and providing industrial development bond financing for manufacturing and other facilities through the Syracuse Industrial Development Agency (SIDA). The City also partners with other local, State, and Federal Economic Development agencies such as the U.S. Small Business Administration, Empire State Development Corporation, and Center State CEO.

There also has been considerable activity in the City involving the hotel industry, indicating an increase in tourism and return of business travelers to the City's downtown area. A local developer completed a \$70 million renovation of the historic Hotel Syracuse; converting it into a full service Marriott Hotel to serve as the official Onondaga County Convention Center Hotel. In 2020, the facility underwent a second phase adding 54 rooms and making environmental efficiency updates. This \$8 million project made further enhancements to one of Syracuse's hospitality and conference facilities. Immediately adjacent to the Marriott Syracuse Downtown is the Salt City Market. Completed and opened in early 2021, this mixed use new construction development houses a food hall with 13 unique food and retail vendors that are local entrepreneurs, as well as 26 apartments and commercial office space. This \$25 Million development was built on an underused parking lot, and is now leveraging new investments. The developer is next looking to develop the sister property into an extended stay product. These projects are just some examples of multiple redevelopment projects anchored on the southern end of Downtown, where total projected investment now exceeds \$150 million.

Another economic development emphasis in the traditional downtown area continues to be on the retention and expansion of jobs. The Syracuse Technology Garden, a small business incubator operated by Center State CEO. The facility is home to GENIUS NY, the largest unmanned aerial systems (UAS) business competition in the world, continues to thrive as plans proceed for the Tech Garden to undergo a \$16 million vertical expansion. TCGPlayer.com established its headquarters in the City in the Fall of 2018. The company is one of Syracuse's fastest growing companies, with now over 500 people in its workforce.

Expanding the supply of market-rate housing in the downtown area is also a priority. Highlights include the Merchant's Commons mixed use development, Pike Block, and the Deys Building. Downtown's occupancy remains near 99% additional development is planned for neighborhoods adjacent to the traditional central business district. With a number of new projects in the pipeline, the demand for mixed use redevelopment remains very strong.

Significant growth is also occurring at the other institutions in the University Hill area. Crouse Hospital recently financed construction of a new emergency operations complex. The Veterans' Hospital has substantially improved and expanded its facility with a private medical center, has added 50,000 sq. ft. to its facility, and completed an \$86 million Spinal Cord Injury Center. SUNY Upstate Medical University has completed the construction of a \$36 million academic building, an \$85 million Cancer Center, and the new \$140 million Nappi Longevity Institute is currently under construction and slated to open in early 2023. SUNY ESF completed construction of its Centennial Hall project, proving additional housing for its students on the ESF campus.

On the City's Northside, Saint Joseph's Hospital has completed the second phase of its expansion, which includes a six-story building that will house 110 private rooms, a surgical suite with 14 operating rooms, intensive care units, and other facilities.

Several initiatives are in progress to encourage the revitalization of the Southside of Syracuse. Syracuse University's Falcone Center for Entrepreneurship is implementing several initiatives to encourage entrepreneurial growth on the Southside: the Southside Innovation Center for new businesses, a micro loan fund, and technical assistance for Southside businesses. The City is collaborating with a number of neighborhood-based economic development

partners to encourage the revitalization of the South Salina Street business corridor, which is evidenced by the recent opening of the Eat to Live Food Cooperative on South Salina Street.

In 2019, the City launched a major economic development strategy called Syracuse Surge, to promote inclusive growth in the "new economy" that is taking shape as part of the 4th Industrial Revolution. The growing importance of advanced technologies, the "Internet of Things", big data, and other innovations are rapidly transforming most industries and creating new business opportunities. In recognition of this economic shift, Syracuse is striving to be a smart and more connected City, and making key investments in digital infrastructure and technical education/workforce development opportunities to attract high tech firms and enable City residents to be competitive for higher paying tech jobs in the future.

The City's first investment in digital infrastructure was a \$28 million investment to acquire the city's 17,000+ streetlights from our local utility company, and install an LED-based fully connected streetlight network. All of the city's streetlights are now converted to LED technology, estimated to save the City about \$3M annually in maintenance and energy costs. This "Smart Streetlight Project" was recognized by the New York Power Authority (NYPA) as one of the most innovative projects in New York in 2019—Syracuse was awarded \$500,000 by NYPA and named "New York's Flagship Smart City." The connected lighting network is able to transmit data about the functionality of each light so that the City can proactively address outages and offer more effective and equitable lighting services to all neighborhoods in the City. The network is also capable of supporting sensors and other technologies that will be deployed in future years to monitor conditions of city roads, water infrastructure, and other data that can enable the city to operate more efficiently.

In April 2019, JPMorgan Chase awarded the City a \$3 million grant for Syracuse Surge as part of JPMC's the *Advancing Cities* program to develop job training and workforce inclusion initiatives for on high-tech sectors and entrepreneurship. Our Syracuse Advancing Cities Program, managed by our regional economic development partner CenterState CEO, is implementing several initiatives to fund job training and apprenticeship programs for coding, software development, and other digitally-enabled fields; support and grow minority-owned tech startups; and give established companies in Central New York employee retention tools focused on attracting and retaining diverse talent.

The City offers various financial incentives in order to stimulate private investment by commercial and industrial businesses. Among other benefits, programs provide incentives in the form of below-market-rate term loans. The proceeds of such loans generally must be expended on capital assets used in a business or trade. Certain programs are limited to improving or expanding existing facilities while others permit the loans to be applied to a new venture. In addition to loan programs, real estate projects may be eligible for a partial exemption from property taxes pursuant to Section 485-b and Section 485-a of the Real Property Tax Law, as well as through the Syracuse Industrial Development Agency (SIDA).

The Department of Neighborhood & Business Development has created new ways to make working with the City easier and more efficient for businesses. The Department works with other City departments as well as other government agencies, lending institutions, and economic development agencies to assist companies with relocation plans and financing options. The group's proactive approach helps to identify and solve potential problems. Additionally, a new expedited permitting process has been implemented. It includes the opportunity for a predevelopment meeting with businesses and developers who wish to expand or build within the City and the assignment of case managers to assist them in their planning and development activities.

The City of Syracuse has witnessed unprecedented development and investment – evidenced by increased construction and permitting activity for projects approved by the City's Central Permit Office (CPO). In March 2022, the City broke the record for its highest amount of construction value for projects being issued permits in a single month, exceeding \$153 million. Projections show 2022-23 to generate continued investment that will complement public sector infrastructure investments planned in 2022 and beyond with the replacement of the I-81 viaduct with Business Loop 81. This project, led by the New York State Department of Transportation (NYS DOT) is being led in coordination with the City and other partners, is estimated to cost \$1.7 billion and will last a minimum of six years. Upon its completion, the project will create additional real estate development opportunities, and is likely to create additional land that will be eligible to return to the City tax rolls.

As the City of Syracuse continues its ongoing revitalization and becoming a leading example of a 21st Century urban community, new investment opportunities and public/provide partnerships will create a future of opportunities for all residents and visitors alike to take part in Syracuse's pursuit of being a growing city that embraces diversity and creates opportunity for all.

A summary of the major economic development programs provided by the City follows:

Administrator	Program	Program Eligibility	Program Benefits
Syracuse Economic Development Corporation	SEDCO Direct Loans	Commercial, retail or industrial. Private sector financing including minimum 10% equity.	50% of Project Costs up to \$125,000 – low interest.
		Job creation and retention.	
Empire State Development Corp.	Economic Development Fund	Job creation and retention.	No minimum or maximum. Program will be developed for specific company needs. Interest subsidy, grants and or low interest loans.
Syracuse Industrial Development Agency	Industrial Facilities	Acquisition, construction or tax- exempt and taxable revenue bonds	Financing up to 100% Improvement of manufacturing costs. Sales tax exemption on construction materials. Exempt from mortgage tax.
City Assessment Department	Real Property Tax Law: Section 485-b	Non-residential property. Construction, alteration, installation or improvement after January 1, 1976 with excess of \$10,000.	Property tax exemption for 10 years. Maximum 50%, decline 5% a year.
Real Property Tax Law:	Section 485-a	Non residential property converted to a mix of residential and commercial uses.	100% exemption of exemption base for the first 8 years. Declines by 20% per year in years 9-12. Full assessment in year 13.
NYSERDA	Central New York Energy \$mart Communities	Any business.	Energy efficiency programs.
New York State Department of State	Brownfield Opportunity Area (BOA) Program	There are two designated areas for the BOA program: The Gateway section of South Salina Street and Erie Blvd East approximately between Beech and Thompson Streets.	\$500,000 grant will result in a comprehensive market analysis tool and 3-4 Brownfield sites will be nominated for site investigation.
New York State Department of Environmental Restoration	Environmental Restoration Program (ERP)	All Brownfield sites that are either owned or have the potential to be acquired by the City could be eligible for the Program, although they need to be deemed eligible by the NYS-DEC.	90% of the costs for site investigation and remediation are reimbursable by the State.
Syracuse Cooperative Federal Credit Union (SCFCU)	Micro Loan Program	Loans up to \$10,000 for new and emerging businesses with focus on M/WBE's. Collaborative program – SCFCU, Innovation Center, SEDCO.	
SCFCU	Working Capital Program	Loans up to \$10,000 for working capital on City and NFP housing projects. SEDCO provides a portion of the financing.	

The following table is a non-exhaustive list of significant economic development projects undertaken in the City since 2012. Certain of these projects are currently in progress.

Economic Development Projects

Project Name	Total Development Cost	Total Project Sq. Feet	Construction Jobs	Retained/ New Jobs
St. Joseph's Hospital Expansion	\$245,000,000	150,000	600	200
Grange Realty Associates, LLC	3,069,000	23,720	20	-
Butternut Crossing Commercial Enterprises	900,514	3,870	33	-
Jubilee Homes LLC PRRC LLC	5,300,000	34,840	50	85
900 East Fayette Group, LLC	8,619,415	53,400	168	1
State Tower Building LLC	41,660,000	N/A	N/A	N/A
Empire Syracuse, LLC	9,355,744	95,600	60	2
Maguire Family Limited Partnership	15,783,742	59,800	45	121
Oak Knitting Mill Commons, LLC	9,745,856	68,000	150	-
Addis Building LLC	5,572,246	37,500	83	-
Symphony Tower LLC	19,000,000	129,000	226	52
Joint School Construction Board Bonds (Series 2017)	29,260,000	-	-	-
BVSHSSF Syracuse, LLC (Peak Campus Project)	66,607,356	421,482	220	15
CGUSL Ventures, LLC (Southside Genesee Associates)	46,380,320	128,830	200	7
Syracuse 727 (Campus Plaza Project)	40,520,000	168,400	150	56
Dupli Associates, LLC	3,562,000	21,000	-	-
Steri-Pharma, LLC	50,165,986	91,500	250	130
Crouse Hospital Emergency Room Expansion	38,000,000	21,000	N/A	40
Syracuse Community Hotel Restoration LLC (Phase II)	8,190,000	70,000	62	22
Armory Boys LLC	1,281,000	18,000	20	1
415 South Clinton Street,LLC	2,098,184	21,000	20	3
321 South Salina Street LLC	4,328,720	37,000	168	19
Joint School Construction Board Bonds (Series 2018 A)	67,265,000	-	-	-

Ascension Gaming Network (TCG Player)	2,681,500	45,000	5	329
SUNY Upstate Cancer Center	74,000,000	90,000	N/A	100
Syracuse 727	3,500,000	N/A	N/A	N/A
Joint School Construction Board Bonds (Series 2018 B)	38,500,000	-	-	-
Rapid Response Monitoring Inc. (2018 Phase)	5,000,000	N/A	50	100
Gerharz Equipment Inc.	4,965,000	85,000	125	48
300 Washington St LLC	35,087,000	337,376	800	6
Towers Realty LR,Ltd.	19,401,479	685,000	296	1,506
Acropolis Center LLC	10,338,938	123,500	65	95
Deys Plaza LLC	3,704,000	71,111	30	101
Commonspace Warren LLC	12,114,112	83,365	15	71
900 East Fayette Group LLC	849,112	N/A	N/A	N/A
Washington Walton Company LLC	3,000,000	N/A	N/A	N/A
Joint School Construction Board 2019 A Series Bonds	65,435,000	N/A	N/A	N/A
Salina 1st LLC	11,330,232	51,000	70	39
Seneca Armory Associates LLC	2,872,400	28,868	50	35
Alan Byer Auto Sales Inc.	3,365,000	25,820	-	93
Syracuse SOMA LLC	19,130,000	99,200	80	5
Gerharz Equipment Inc.	2,250,000	N/A	N/A	N/A
Syracuse Community Hotel Restoration LLC (Phase II)	8,190,000	N/A	N/A	N/A
300 Spencer Street LLC	39,664,000	100,000	100	506
Jasso Properties LLC	3,088,391	50,000	80	12
Smith Building LLC	6,596,160	31,196	50	-
Joint School Construction Board 2020 A Series Bonds	80,530,000	N/A	N/A	N/A
Syracuse Hancock International Airport Terminal Expansion	62,000,000	147,000	N/A	N/A
900 East Fayette Group LLC	1,000,000	N/A	N/A	N/A
Commonspace Warren LLC	2,300,000	N/A	N/A	N/A
JMA Tech Properties LLC	26,027,000	118,502	50	100

Willow Street Lofts	862,000	N/A	N/A	N/A
	9,890,000	99,800	150	42
Ranalli ALA, LLC		•		
Dupli Associates LLC	19,747,799	211,800	254	128
Syracuse Urban Partnership	29,163,609	80,000	60	9 N/A
Syracuse University Carrier Dome Roof Replacement	112,000,000	N/A	N/A	N/A
Franklin Lofts LLC	875,000	N/A	N/A	N/A
JSCB 2021A	26,440,000	N/A	N/A	N/A
Ranalli ALA, LLC	1,065,300	N/A	N/A	N/A
Rapid Response Monitoring Services Inc.	5,500,000	N/A	N/A	N/A
444 East Genesee Street LLC	4,104,846	27,000	60	5
400 West Division Street, LLC	19,086,000	54,000	50	75
313 S. Salina St LLC	2,813,712	20,592	30	3
101 North Salina St. LLC	19,115,532	80,000	200	238
1970 W. Fayette LLC	6,121,299	36,400	35	25
Beacon Armory LLC	7,500,000	42,900	40	2
The Syracuse Flat Iron, LLC	2,277,806	9,359	40	5
Syracuse Bread Factory	16,090,000	64,400	80	33
Intrepid Lane Endoscopy & Surgery Center	6,861,790	61,088	54	20
400 South Salina Street LLC	37,018,166	N/A	N/A	N/A
Jemal's Gridley LLC	16,050,199	392,316	126	21
Wellington Place Apartments	52,000,000	N/A	N/A	N/A
Syracuse Community Health Center Expansion	22,500,000	N/A	N/A	N/A
SUNY Upstate Nappi Wellness Center	158,000,000	209,000	N/A	150
Syracuse STEAM School	74,000,000	149,000	N/A	N/A
Syracuse Technology Garden Expansion	16,000,000	46,000	N/A	230
Former Syracuse Developmental Center Redevelopment	50,000,000	660,000	N/A	200
Fransiscan Center / Maria Regina Campus Redevelopment	78,000,000	100,000	N/A	N/A
Totals	\$2,061,667,465	6,169,535	5,570	5,086

END OF APPENDIX A

APPENDIX B

UNAUDITED SUMMARY OF FINANCIAL STATEMENTS AND BUDGETS

CITY OF SYRACUSE, NEW YORK GENERAL FUND BALANCE SHEET UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEM) AS OF JUNE 30:

	2017	2018	2019	2020
ASSETS				
Cash and Cash Equivalents	\$17,865,188	\$ 40,823,513	\$ 35,540,625	\$ 31,754,859
Restricted Cash and Cash Equivalents	0	19,712,402	18,985,801	26,406,245
Accounts Receivable	2,538,591	1,560,062	2,366,592	1,085,813
Taxes Receivable (Net)	6,314,284	5,204,007	4,757,873	4,675,092
Due From Other Funds	3,082,782	5,004,177	6,879,770	7,055,292
Due From Other Governments	44,424,691	48,385,104	47,831,694	40,886,869
TOTAL ASSETS	\$74,225,536	\$120,689,265	\$116,362,355	\$111,864,170
LIABILITIES AND FUND BALANCE				
Liabilities:				
Accounts Payable and Accrued Exp.	\$ 4,324,928	\$ 9,278,178	\$ 5,844,203	\$ 6,059,545
Accrued Interest	0	0	798,750	588,867
Due To Other Governments	26,331	23,298	23,957	14,002
Amount Due To Retirement Systems	5,492,321	5,208,467	5,528,030	5,428,428
Revenue Anticipation Notes Payable	0	43,900,000	42,600,000	48,400,000
Self-Insurance Claims	5,919,095	4,354,622	5,819,985	5,492,891
Unearned revenue	0	0	0	0
Other Liabilities	189,343	146,680	127,134	43,567
Total Liabilities	15,952,018	62,911,245	60,742,059	66,027,300
Deferred Inflow of Resources/ Unavailab	le			
Revenue	5,457,910	4,130,185	3,619,595	3,727,121
Fund Balance:				
Restricted	361,550	361,550	468,740	430,398
Assigned	16,542,354	11,105,171	7,883,468	9,002,813
Unassigned	35,911,704	42,181,114	43,648,493	32,676,538
Total Fund Balance	52,815,608	53,647,835	52,000,701	42,109,749
TOTAL LIABILITIES AND				
FUND BALANCE	\$74,225,536	\$120,689,265	\$116,362,355	\$111,864,170

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City.

The reader of the Official Statement may refer to such reports which are available upon request.

CITY OF SYRACUSE, NEW YORK GENERAL FUND STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEME) FOR THE YEARS ENDED JUNE 30:

	2017	2018	2019	2020
REVENUES:	***	***	000000111	***
General Property Taxes and Tax Items	\$38,430,482	\$38,799,174	\$38,286,111	\$39,725,982
Sales Tax and Use Tax	81,418,802	87,057,793	89,344,677	85,414,655
Other Local Taxes	3,095,303	3,159,797	3,122,704	2,999,440
Departmental Revenues	11,860,918	11,626,872	12,947,989	11,605,974
Intergovenmental Charges	258,415	253,259	172,472	316,918
Licenses and Permits	3,099,058	2,535,632	2,831,004	2,044,389
Fines and Forfeitures	3,294,717	4,315,791	3,615,332	3,054,629
Sale of Property and Compensation for Loss	441,974	474,498	325,017	427,233
Use Of Money and Property	175,650	395,972	882,687	686,185
Federal and State Aid and Other Grants	81,237,899	79,069,607	79,912,222	68,635,480
Other Revenues	6,976,290	5,905,558	6,654,657	4,512,493
Total Revenues	230,289,508	233,593,953	238,094,872	219,423,378
EXPENDITURES:				
Current:				
General Government Support	28,148,838	25,467,121	28,399,586	25,177,973
Public Safety	141,183,171	146,603,943	148,723,838	143,486,099
Transportation	21,616,926	22,736,144	21,362,622	21,128,517
Home and Community Services	14,296,738	13,520,557	13,194,114	12,820,309
Culture and Recreation	11,076,616	10,811,507	10,877,224	9,906,473
Interest on Debt	460,937	727,095	826,186	624,367
Total Expenditures	216,783,226	219,866,367	223,383,570	213,143,738
Excess of Revenues Over Expenditures	13,506,282	13,727,586	14,711,302	6,279,640
OTHER FINANCING SOURCES (USES):				
Proceeds From Serial Bonds	1,205,000	4,250,000	577,000	550,000
Premium on issuance of BANs and RANs	0	0	219,390	208,120
Bond Premiums	269,168	382,372	67,493	81,739
Operating Transfers In	2,825,000	2,825,000	2,825,000	2,825,000
Operating Transfers Out	(20,192,040)	(20,352,731)	(20,047,319)	(19,835,481)
Total Other Financing Sources (Uses)	(15,892,872)	(12,895,359)	(16,358,436)	(16,170,622)
Excess (Deficiency) of Revenues and Other Sources Over				
Expenditures and Other Uses	(2,386,590)	832,227	(1,647,134)	(9,890,982)
Emperior and control	(=,500,500)	05 2,22 7	(1,0 17,10 1)	(5,050,502)
Fund Balance - Beginning of Year	0	0	0	0
Prior Period Adjustments	0	0	0	0
Fund Balance At Beginning				
Of Year As Restated	55,202,198	52,815,608	53,647,835	52,000,701
Fund Balance - End of Year	\$52,815,608	\$53,647,835	\$52,000,701	\$42,109,719

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City.

The reader of the Official Statement may refer to such reports which are available upon request.

CITY SCHOOL DISTRICT OF SYRACUSE, NEW YORK GENERAL FUND BALANCE SHEET UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMEN' AS OF JUNE 30:

	2017	2018	2019	2020
ASSETS				
Pooled Cash and Cash Equivalents	\$33,343,909	\$ 45,426,000	\$ 40,563,713	\$ 80,315,351
Pooled Restricted Cash and Cash Equivalents	1,923,128	2,298,098	2,448,721	3,165,712
Receivables:				
Due From Other Funds	4,610,262	6,712,354	352,936	5,255,925
State and Federal Aid	45,728,574	39,639,456	57,708,697	39,700,959
Due From Other Governments	183,944	237,653	189,074	188,153
Due From JSCB	2,166,958	2,048,616	3,758,897	4,221,967
Due From the City Other	3,812,613 290,167	3,443,232 89,688	2,957,807 432,839	3,392,727 482,263
Inventory	1,037,120	1,086,364	1,158,126	1,607,071
Prepaid Expenses	13,444	187,186	284,090	370,793
Trepard Expenses	13,444	107,100	204,070	310,173
TOTAL ASSETS	\$93,110,119	\$101,168,647	\$109,854,900	\$138,700,921
LIABILITIES AND FUND BALANCE				
Liabilities:				
Payables:				
Accounts Payable	\$17,592,722	\$ 14,984,432	\$ 20,170,332	\$ 12,341,100
Accrued Expenses	4,391,385	3,067,335	846,881	3,242,717
Accrued Payroll	1,787,365	1,687,248	1,533,380	1,239,396
Due to other governments	0	0	0	0
Notes Payable:				
Revenue anticipation notes	0	0	0	23,664,000
Other Liabilities:				
Due To Retirement System	24,046,768	21,576,467	23,841,724	21,230,349
Accrued Compensated Absences	0	0	0	1.056.000
Self-insured workers' compensation claims	1,459,716	885,546	1,415,200	1,076,823
Total Liabilities	49,277,956	42,201,028	47,807,517	62,794,385
State Aid				
Total deferred inflow of resources	0	0	0	1,557,964 1,557,964
Fund Balance:	Ţ.	U	O .	1,557,704
Nonspendable	1,050,564	1,273,550	1,442,216	1,977,864
Restricted	0	0	2,448,721	3,096,470
Assigned	14,122,478	27,512,829	32,772,506	25,201,882
Unassigned	28,659,121	26,981,240	25,383,940	44,072,356
Total Fund Balance	43,832,163	55,767,619	62,047,383	74,348,572
TOTAL LIABILITIES AND				
FUND BALANCE	\$93,110,119	\$ 97,968,647	\$109,854,900	\$138,700,921

Source: The financial data presented above is based on the separately audited financial statements of the School District because the the General Fund of the School District is not presented on a stand alone basis in the City's financial statements. Under the requirements of GASB Statement No. 54, the General Fund of the School District is reported as a governmental fund in the City's major special revenue funds that also includes the special aid fund of the School District. The reader of the Official Statement may refer directly to such reports, which are available upon request.

CITY SCHOOL DISTRICT OF SYRACUSE, NEW YORK GENERAL FUND STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE

UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMEN' FOR YEARS ENDED JUNE 30:

	2017	2018	2019	2020
REVENUES:				
General Property Taxes	\$58,556,586	\$59,413,001	\$59,457,042	\$61,161,816
Nonproperty Taxes	654,940	690,178	701,683	688,347
Charges For Services	184,829	200,973	261,538	276,420
Use Of Money and Property	262,761	629,130	818,845	260,409
Sale of Property & Compensation for Loss	232,777	106,726	52,146	1,337,001
Miscellaneous	769,217	916,090	826,072	2,281,351
Federal And State Aid and Other Grants (a)	328,832,461	340,715,987	349,387,052	368,683,338
Total Revenues	389,493,571	402,672,085	411,504,378	434,688,682
EXPENDITURES:				
Current:				
General Government Support	55,255,037	57,384,382	66,057,605	68,439,209
Instruction	285,513,075	288,105,954	298,916,573	297,529,381
Pupil transportation	22,721,568	23,042,648	23,422,533	23,537,472
Pass- Through NYS Funding to JSCB	11,826,463	8,984,981	10,972,231	20,543,696
Debt Service	826,290	1,947,071	1,763,238	1,439,842
Total Expenditures	376,142,433	379,465,036	401,132,180	411,489,600
Excess of Revenues Over Expenditures	13,351,138	23,207,049	10,372,198	23,199,082
OTHER FINANCING SOURCES (USES):				
Premium on Issuance of RAN	0	440,864	282,587	145,391
Operating Transfers In	6,765,831	5,050,176	6,527,868	4,636,108
Operating Transfers (Out) (b)	(12,750,175)	(13,562,633)	(14,102,889)	(15,679,392)
Total Other Financing Sources (Uses)	(5,984,344)	(8,071,593)	(7,292,434)	(10,897,893)
Excess (Deficiency) of Revenues				
and Other Sources Over	7.266.504	15 125 456	2.070.744	10 201 100
Expenditures and Other Uses	7,366,794	15,135,456	3,079,764	12,301,189
Fund Balance - Beginning of Year	34,869,323	43,832,163	58,967,619	62,047,383
Prior Period Adjustment	1,596,046	0	0	0
Fund Balance - Beginning of Year, as Restated	36,465,369	43,832,163	58,967,619	62,047,383
Fund Balance - End of Year	\$43,832,163	\$58,967,619	\$62,047,383	\$74,348,572

⁽a) Includes STAR reimbursements.

Source: The financial data presented above is based on the separately audited financial statements of the School District because the the general fund of the School District is not presented on a stand alone basis in the City's financial statements. Under the requirements of GASB Statement No. 54, the general fund of the School District is reported as a governmental fund in the City's major special revenue funds that also includes the special aid fund of the School District. The reader of the Official Statement may refer directly to such reports, which are available upon request.

⁽b) Classification includes transfers for debt service.

CITY OF SYRACUSE, NEW YORK SEWER FUND STATEMENT OF NET ASSETS UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMEN AS OF JUNE 30:

	2017	2018	2019	2020
ASSETS:				
Current:				
Pooled Cash and Cash Equivalents	\$ 6,919,957	\$ 6,252,913	\$ 5,699,033	\$ 5,364,519
Accounts Receivable Due From Other Funds	620,368 0	640,891 0	732,694 0	830,790 0
Due From Other Governments	14,371	1,978	1,978	14,371
Prepaid Expenses And Other	0	0	0	0
Total Current Assets	7,554,696	6,895,782	6,433,705	6,209,680
Noncurrent:				
Restricted Cash	0	0	0	0
Capital Assets (Net)	15,709,214	15,894,349	15,989,336	15,350,227
Total Noncurrent Assets	15,709,214	15,894,349	15,989,336	15,350,227
TOTAL ASSETS	\$ 23,263,910	\$ 22,790,131	\$ 22,423,041	\$ 21,559,907
DEFERRED OUTFLOWS OF RESOURCES:				
Deferred Outflows - Debt Refunding	122,055	109,850	97,645	85,440
Deferred Outflows - OPEB	0	0	165,357	976,839
Deferred Outflows - Pensions	387,059	791,222	292,714	1,052,601
Total Deferred Outflows of Resources	509,114	901,072	555,716	2,114,880
LIABILITIES:				
Current:				
Accounts Payable And Accrued Expenses	346,886	414,833	194,390	140,258
Accrued Interest Payable	55,385	48,245	42,131	32,765
Due to Other Funds	7,113	4,054	1,522	1,922
Current Portion of Bonds Payable	571,827	507,361	532,248	591,440
Amounts Due To Retirement Systems	60,761	63,567	68,355	61,841
Accrued Compensated Absences	16,011	16,011	16,011	16,011
Self Insurance Claims	170,538	303,782	62,907	354,360
Total Current Liabilities	1,228,521	1,357,853	917,564	1,198,597
Noncurrent:				
Bonds - Net of Current Portion	4,118,459	3,611,068	3,358,033	2,788,268
Amounts Due To Retirement Systems	7,460	5,475	2,804	0
Accrued Compensated Absences	104,687	104,687	118,388	153,951
Self Insurance Claims	274,534	566,404	24,290	377,404
Net Pension Liability	570,577	177,639	497,080	1,669,798
Other Postemployment Benefits	7,970,300	23,054,695	23,422,756	11,704,898
Total Noncurrent Liabilities	13,046,017	27,519,968	27,423,351	16,694,319
Total Liabilities	14,274,538	28,877,821	28,340,915	17,892,916
DEFERRED INFLOWS OF RESOURCES:				
Deferred Inflows - OPEB	0	0	1,247,174	11,340,623
Deferred Inflows - Pensions	102,190	876,068	426,452	45,203
Total Deferred Inflows of Resources	102,190	876,068	1,673,626	11,385,826
NET ASSETS:				
Invested in Capital Assets,Net of Related Debt	11,018,928	11,775,920	42,656,871	11,970,519
Restricted	0	0	474,292	0
Unrestricted:	-	~	,	,
Undesinated	(1,622,632)	(17,838,606)	(31,973,762)	(17,574,474)
Total Net Assets	9,396,296	(6,062,686)	11,157,401	(5,603,955)
	\$ 23,263,910	\$ 22,790,131	\$ 40,616,226	\$ 21,559,907

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City.

The reader of the Official Statement may refer to such reports which are available upon request.

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SEWER FUND STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMENTS FOR THE YEARS ENDED JUNE 30:

	2017	2018	2019	2020
REVENUES:				
Charges for Services Miscellaneous	\$5,473,568 0	\$ 5,410,744 7,347	\$ 5,454,007 112,887	\$ 5,503,855 41,876
Total Operating Revenues	5,473,568	5,418,091	5,566,894	5,545,731
OPERATING EXPENSES:				
Cost of Services Administration Depreciation	4,705,717 228 709,337	5,131,815 0 846,480	4,088,117 960 859,674	3,411,632 0 985,270
Total Operating Expenses	5,415,282	5,978,295	4,948,751	4,396,902
Net Operating Income (Loss)	58,286	(560,204)	618,143	1,148,829
NONOPERATING REVENUES (EXPENSES)				
Grants Received Grant Programs Investment Income Interest Expense	152,219 0 0 (166,938)	0 0 48,645 (142,721)	0 0 0 (126,081)	0 0 0 (132,160)
Total Nonoperating Revenues (Expenses)	(14,719)	(94,076)	(126,081)	(132,160)
Income Before Contributions And Operating Transfers	43,567	(654,280)	492,062	1,016,669
Operating Transfers Out	(525,000)	(525,000)	(525,000)	(525,000)
Change In Net Assets	(481,433)	(1,179,280)	(32,938)	491,669
Net Assets As Restated, Beginning Of Year	9,877,729	(4,883,406)	(6,062,686)	(6,095,624)
TOTAL NET ASSETS AT END OF YEAR	\$9,396,296	\$(6,062,686)	\$(6,095,624)	\$(5,603,955)

⁽¹⁾ Restated amount, see Note # in the Audited Financial Statements for the fiscal year ended June 30, 2020.

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City.

The reader of the Official Statement may refer to such reports which are available upon request.

CITY OF SYRACUSE, NEW YORK WATER FUND STATEMENT OF NET ASSETS UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMEN' AS OF JUNE 30:

	2017	2018	2019	2020
ASSETS:	2017	2018	2019	2020
Current:				
Cash and Cash Equivalents	\$ 10,579,562	\$ 9,619,699	\$ 9,186,661	\$ 9,598,443
Accounts Receivable	2,284,249	2,319,516	2,621,491	3,175,374
Total Current Assets	12,863,811	11,939,215	11,808,152	12,773,817
Noncurrent:				
Restricted Cash	1,142,357	474,292	474,292	474,292
Capital Assets (Net)	97,289,458	97,168,195	97,989,788	97,053,426
Total Noncurrent Assets	98,431,815	97,642,487	98,464,080	97,527,718
TOTAL ASSETS	\$111,295,626	\$109,581,702	\$110,272,232	\$110,301,535
DEFFERED OUTFLOWS OF RESOURCES				
Deferred Outflows-Relating to Debt Refunding	(277,747)	(249,973)	222,198	194,423
Deferred Outflows- OPEB	0	0	30,116	1,330,038
Deferred Outflows-Relating to Pensions	(1,130,880)	(1,627,074)	740,951	2,732,885
Total Deferred Outflow of Resources	(1,408,627)	(1,877,047)	993,265	4,257,346
LIABILITIES:				
Current:				
Accounts Payable And Accrued Expenses	\$ 1,194,427	\$ 1,550,768	\$ 1,031,217	\$ 925,144
Accrued Interest Payable	424,332	397,837	377,520	349,433
Due to Other Funds	14,896	25,150	2,930	6,911
Current Portion of Bonds Payable	3,889,105	3,750,866	3,722,377	3,594,494
Amounts Due To Retirement Systems Accrued Compensated Absences	171,794	168,027	173,532	160,429 24,834
Self Insurance Claims	24,834 563,517	24,834 520,681	24,834 563,656	615,962
Sen insurance Claims	303,317	320,001	303,030	015,702
Total Current Liabilities	6,282,905	6,438,163	5,896,066	5,677,207
Noncurrent:				
Bonds - Net of Current Portion	57,697,261	53,992,552	51,610,540	48,973,905
Amounts Due To Retirement Systems	21,092	14,483	7,418	0
Accrued Compensated Absences	291,075	291,075	282,393	312,203
Self Insurance Claims	1,027,906	938,490	755,692	624,368
Net Pension Liability	1,649,838	610,300	1,258,268	4,335,323
Other Postemployment Benefits	17,891,000	38,528,703	38,624,093	18,581,664
Total Noncurrent Liabilities	78,578,172	94,375,603	92,538,404	72,827,463
TOTAL LIABILITIES	84,861,077	100,813,766	98,434,470	78,504,670
DEFERRED INFLOWS OF RESOURCES				
Deferred inflows- OPEB	0	0	1,247,174	18,543,686
Deferred inflows-relating to pensions	294,503	2,120,451	426,452	117,360
Total Inflows of Resources	294,503	2,120,451	1,673,626	18,661,046
NET ASSETS:				
Invested in Capital Assets, Net of Related Debt	36,845,449	39,424,777	42,656,871	44,485,027
Restricted	1,142,357	474,292	474,292	474,292
Unrestricted (deficit)	(10,439,133)	(31,374,537)	(31,973,762)	(27,566,154)
,	(,,)	(= -,= / 1,00 /)	(==,=,=,==)	(=-,===)
Total Net Assets	27,548,673	8,524,532	11,157,401	17,393,165
TOTAL LIABILITIES AND NET ASSETS	\$111,295,626	\$109,581,702	\$111,011,588	\$100,272,541

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City. The reader of the Official Statement may refer to such reports which are available upon request.

CITY OF SYRACUSE, NEW YORK WATER FUND

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS UNAUDITED PRESENTATION (EXTRACTED FROM AUDITED STATEMENT FOR THE YEARS ENDED JUNE 30:

2017	2018	2019	2020
\$19,968,582 634,388	\$21,225,035 640,249	\$21,420,556 522,911	\$22,260,983 608,036
20,602,970	21,865,284	21,943,467	22,869,019
14,946,390 303,861 3,304,816	14,061,411 420,803 3,438,533	13,341,895 310,717 3,321,482	9,900,515 289,249 3,467,380
18,555,067	17,920,747	16,974,094	13,657,144
2,047,903	3,944,537	4,969,373	9,211,875
0 4,709 (1,997,676)	509,580 81,170 (1,851,935)	1,711,460 5,327 (1,753,291)	991,663 2,692 (1,670,466)
(1,992,967)	(1,261,185)	(36,504)	(676,111)
54,936	2,683,352	4,932,869	8,535,764
(2,300,000)	(2,300,000)	(2,300,000)	(2,300,000)
(2,245,064) 29,793,737	383,352 8,141,180	2,632,869 8,524,532	6,235,764 11,159,401
\$27,548,673	\$ 8,524,532	\$11,157,401	\$17,395,165
	\$19,968,582 634,388 20,602,970 14,946,390 303,861 3,304,816 18,555,067 2,047,903 0 4,709 (1,997,676) (1,992,967) 54,936 (2,300,000) (2,245,064) 29,793,737	\$19,968,582 634,388 640,249 20,602,970 21,865,284 14,946,390 14,061,411 303,861 420,803 3,304,816 3,438,533 18,555,067 17,920,747 2,047,903 3,944,537 0 509,580 4,709 81,170 (1,997,676) (1,851,935) (1,992,967) (1,261,185) 54,936 2,683,352 (2,300,000) (2,300,000) (2,245,064) 383,352 29,793,737 8,141,180	\$19,968,582

Source: The financial data presented on this page has been excerpted from the Audited Financial Statements of the City.

The reader of the Official Statement may refer to such reports which are available upon request.

CITY OF SYRACUSE, NEW YORK SUMMARY OF ADOPTED BUDGET FOR THE YEAR ENDING JUNE 30, 2022 and 2023

	<u>2022</u>	<u>2023</u>
	City General	City General
	Fund	Fund
ESTIMATED REVENUES:		
Fund Balance	\$ -	\$ 15,630,847
Real Property Taxes	38,696,759	40,851,161
Real Property Tax Items	7,107,949	7,152,949
Sales and Use Tax	92,313,005	112,350,000
Other Non-Property Taxes	4,991,000	5,691,000
Departmental Income	17,089,740	16,445,863
Other Local Revenue	5,246,700	1,292,000
State Aid	75,989,129	76,077,129
Federal Aid	21,945,654	16,736,551
Interfund Transfers	2,825,000	2,922,714
Total Estimated Revenues	\$266,204,936	\$295,150,214
APPROPRIATIONS:		
Current:		
Personel Service	\$113,924,224	\$128,621,033
Equipment and Contractual Expenses	35,326,244	40,829,654
Employee Benefits	87,031,624	87,125,893
Judgements and Claims	1,000,000	1,100,000
Other Special Objects	5,848,137	5,453,414
RAN Interest	295,000	295,000
Capital Projects and Debt Service Transfers	22,779,707	31,725,220
Total Appropriations	\$266,204,936	\$295,150,214

APPENDIX C

LINK TO INDEPENDENT AUDITORS' REPORT FOR THE FISCAL YEAR ENDED JUNE 30, 2021

Can be accessed on the Electronic Municipal Market Access ("EMMA") website of the Municipal Securities Rulemaking Board ("MSRB") at the following link:

https://emma.msrb.org/P21529278-P11193907-P21599928.pdf

The audited financial statements referenced above are hereby incorporated into the attached Official Statement.

^{*} Such Financial Statements and opinion are intended to be representative only as of the date thereof. Bonadio & Co., LLP has not been requested by the City to further review and/or update such Financial Statements or opinion in connection with the preparation and dissemination of this Official Statement.

APPENDIX D

FORM OF BOND COUNSEL'S LEGAL OPINION



June 30, 2022

City of Syracuse City Hall Syracuse, New York 13202

Re: City of Syracuse, Onondaga County, New York

\$24,751,555* Public Improvement Serial Bonds, Series 2022A (the "Bonds")

Ladies and Gentlemen:

We have examined a record of proceedings relating to the issuance \$24,751,555* Public Improvement Serial Bonds, Series 2021A (the "Bonds") of the City of Syracuse, Onondaga County, New York. The Bonds are being issued pursuant to the Local Finance Law, the City Charter, bond ordinances adopted by the Common Council and approved by the Mayor of the City (the "Bond Ordinances"), and a Certificate of Determination of the Commissioner of Finance of the City dated on or before June 30, 2022 relative to the form and terms of the Bonds.

In our opinion, the Bonds are valid and legally binding general obligations of the City for which the City has validly pledged its faith and credit and, unless paid from other sources, all taxable real property within the City is subject to levy of ad valorem real estate taxes to pay the Bonds and interest thereon, subject to applicable statutory limitations. The enforceability of rights or remedies with respect to the Bonds may be limited by bankruptcy, insolvency, subject to applicable statutory limitations, or other laws affecting creditors' rights or remedies heretofore or hereinafter enacted.

The Internal Revenue Code of 1986, as amended (the "Code"), establishes certain requirements that must be met subsequent to the issuance and delivery of the Bonds in order that interest on the Bonds be and remain excluded from the gross income of the owners thereof under Section 103 of the Code. The Commissioner of Finance of the City, in executing the Arbitrage and Use of Proceeds Certificate, has certified to the effect that the City will comply with the provisions and procedures set forth therein and that it will do and perform all acts and things necessary or desirable to assure that interest on the Bonds is excluded from gross income under Section 103 of the Code. We have examined such Arbitrage and Use of Proceeds Certificate of the City delivered concurrently with the delivery of the Bonds, and, in our opinion, such certificate contains provisions and procedures under which such requirements can be met.

In our opinion, interest on the Bonds is excluded from gross income for federal income tax purposes under Section 103 of the Code, and is excluded from adjusted gross income for purposes of New York State and New York City personal income taxes. Interest on the Bonds is not a specific preference item for purposes of the federal individual alternative minimum tax. We express no opinion regarding other tax consequences related to the ownership or disposition of, or the accrual or receipt of interest on, the Bonds.

*Preliminary, subject to change.



The opinions expressed herein are based on an analysis of existing laws, regulations, rulings and court decisions and cover certain matters not directly addressed by such authorities. Such opinions may be affected by actions taken or omitted or events occurring after the date hereof. We have not undertaken to determine or to inform any person, whether any such actions are taken or omitted or events do occur or any other matters come to our attention after the date hereof. Our engagement with respect to the Bonds has concluded with their issuance, and we disclaim any obligation to update this opinion. We have assumed, without undertaking to verify, the accuracy of the factual matters represented, warranted or certified in the documents. Furthermore, we have assumed compliance with all covenants and agreements contained in the Arbitrage and Use of Proceeds Certificate, including without limitation covenants and agreements compliance with which is necessary to assure that future actions, omissions or events will not cause interest on the Bonds to be included in gross income for federal income tax purposes or adjusted gross income for purposes of personal income taxes imposed by the State of New York and the City of New York. We call attention to the fact that the rights and obligations under the Bonds and the Arbitrage and Use of Proceeds Certificate and their enforceability may be subject to bankruptcy, insolvency, reorganization, arrangement, fraudulent conveyance, moratorium or other laws relating to or affecting creditors' rights, to the application of equitable principles, to the exercise of judicial discretion in appropriate cases and to the limitations on legal remedies against New York municipal corporations such as the City. We express no opinion with respect to any indemnification, contribution, penalty, choice of law, choice of forum, or waiver provisions contained in the foregoing documents.

The scope of our engagement in relation to the issuance of the Bonds has extended solely to the examination of the facts and law incident to rendering the opinions expressed herein. The opinions expressed herein are not intended and should not be construed to express or imply any conclusion that the amount of real property subject to taxation within the boundaries of the City, together with other legally available sources of revenue, if any, will be sufficient to enable the City to pay the principal of or interest on the Bonds as the same respectively become due and payable. Reference should be made to the Official Statement dated June 8, 2022 (the "Official Statement") for factual information which, in the judgment of the City would materially affect the ability of the City to pay such principal and interest. We have not verified the accuracy, completeness or fairness of the factual information contained in the Official Statement and, accordingly, no opinion is expressed by us as to whether the City, in connection with the sale of the Bonds, has made any untrue statement of a material fact, or omitted to state a material fact necessary in order to make any statements made, in light of the circumstances under which they were made, not misleading.

We have examined the first executed Bond of said issue and, in our opinion, the form of said Bond and its execution are regular and proper.

Very truly yours,

Trespasz & Marquardt, LLP



DRAFT



