

OFFICIAL STATEMENT

NEW ISSUE

REVENUE ANTICIPATION NOTES

In the opinion of Bond Counsel under existing statutes, regulations and court decisions interest on the Notes is excluded from gross income for Federal income tax purposes, and, under the existing statutes, interest on the Notes is exempt from New York State and New York City personal income taxes. In the opinion of Bond Counsel, interest on the Notes is not a specific preference item for purposes of Federal alternative minimum tax. No opinion is expressed regarding other Federal tax consequences arising with respect to the Notes. See "Tax Exemption" herein.

The District will designate the Notes as "qualified tax-exempt obligations" pursuant to Section 265(b)(3) of the Internal Revenue Code of 1986, as amended.

CANDOR CENTRAL SCHOOL DISTRICT TIOGA AND TOMPKINS COUNTIES, NEW YORK

\$1,200,000 REVENUE ANTICIPATION NOTES, 2021 (the "Notes")

Dated Date: September 10, 2021

Maturity Dates: November 9, 2021

The Notes are general obligations of the Candor Central School District, in Tioga and Tompkins Counties, New York (the "District"), and will contain a pledge of the faith and credit of the District for the payment of the principal of and interest on the Notes and, unless paid from other sources, the Notes are payable from ad valorem taxes which may be levied upon all the taxable real property within the District, without limitation as to rate or amount. (See "Tax Levy Limitation Law" herein).

The Notes will be issued as registered notes, and at the option of the purchaser, may be registered to The Depository Trust Company ("DTC" or the "Securities Depository") or may be registered in the name of the purchaser(s).

If the Notes will be issued as registered Notes, the Notes will be registered in the name of Cede & Co., as nominee of the DTC, New York, New York. DTC will act as securities depository for the Notes. Individual purchases may be made in book-entry form only, in the principal amount of \$5,000 or any integral multiple thereof. Purchasers will not receive certificates representing their ownership interest in the Notes. Payment of the principal of and interest on the Notes will be made by the District to DTC, which will in turn remit such principal and interest to its participants for subsequent disbursement to the beneficial Owners of the Notes as described herein. See "Book-Entry Only System" herein.

If the Notes are registered in the name of the purchaser, principal of and interest on the Notes will be payable in Federal Funds at such bank or trust company(ies) located and authorized to do business in the State of New York as may be selected by the successful bidder(s). In such case, the Notes will be issued in registered form in denominations of \$5,000, or multiples thereof, as may be determined by such successful bidder(s).

The Notes are offered when, as and if issued and received by the purchasers and subject to the receipt of the final approving opinion of Timothy R. McGill, Esq., Fairport, New York, Bond Counsel. It is anticipated that the Notes will be available for delivery through the offices of DTC in New York, New York or at such place as may be agreed upon with the Purchaser on or about September 10, 2021.

The Notes are dated September 10, 2021 and will bear interest from that date until November 9, 2021, the maturity date. The Notes are NOT subject to redemption prior to maturity.

THE DISTRICT DEEMS THIS OFFICIAL STATEMENT TO BE FINAL FOR PURPOSES OF SECURITIES AND EXCHANGE COMMISSION RULE 15c2-12 (THE "RULE"), EXCEPT FOR CERTAIN INFORMATION THAT HAS BEEN OMITTED HEREFROM IN ACCORDANCE WITH SAID RULE AND THAT WILL BE SUPPLIED WHEN THIS OFFICIAL STATEMENT IS UPDATED FOLLOWING THE SALE OF THE OBLIGATIONS HEREIN DESCRIBED. THIS OFFICIAL STATEMENT WILL BE SO UPDATED UPON REQUEST OF THE SUCCESSFUL BIDDER AS MORE FULLY DESCRIBED IN THE NOTICE OF SALE WITH RESPECT TO THE OBLIGATIONS HEREIN DESCRIBED. THE DISTRICT WILL COVENANT IN AN UNDERTAKING TO PROVIDE DISCLOSURE FOR THE NOTES AS DEFINED IN THE RULE. SEE "DISCLOSURE UNDERTAKING," HEREIN.

Dated: August 26, 2021

No dealer, broker, salesman or other person has been authorized by the District to give any information or to make any representations, other than those contained in this Official Statement and if given or made, such other information or representations must not be relied upon as having been authorized by the foregoing. 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 Notes by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale. The information set forth herein has been obtained by the District from sources which are believed to be reliable but it is not guaranteed as to accuracy or completeness. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in the affairs of the District since the date hereof.

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**CANDOR SCHOOL DISTRICT
TIOGA AND TOMPKINS COUNTIES, NEW YORK**

BOARD OF EDUCATION

Hannah Murray
PRESIDENT

Raymond J. Parmarter Vice President
Michael Blake Board Member
Nate Brace Board Member
Kate Davenport Board Member
Brent Doane Board Member
Josh Soper Board Member

Brent Suddaby Superintendent of Schools
Sydney Wade School Business Official
Kathy Hinkle District Clerk

BOND COUNSEL

Timothy R. McGill, Esq.
Fairport, New York

MUNICIPAL ADVISOR



Capital Markets Advisors, LLC
Hudson Valley * Long Island * Southern Tier * Western New York
(716) 662-3910

OFFICIAL STATEMENT

**CANDOR CENTRAL SCHOOL DISTRICT
TIOGA AND TOMPKINS COUNTIES, NEW YORK**

Relating to

**\$1,200,000
REVENUE ANTICIPATION NOTES, 2021
(the "Notes")**

This Official Statement (the "Official Statement"), which includes the cover page, inside cover page, and appendices hereto, presents certain information relating to the Candor Central School District, in Tioga and Tompkins Counties, in the State of New York (the "District," "County" and "State," respectively), in connection with the sale of \$1,200,000 Revenue Anticipation Notes, 2021 (the "Notes").

All quotations from and summaries and explanations of provisions of the Constitution and Laws of the State and acts and proceedings of the District 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 Notes and the proceedings of the District relating thereto are qualified in their entirety by reference to the definitive form of the Notes and such proceedings.

The School District is unable to identify and state herein all of the direct or indirect effects, if any, of the COVID-19 pandemic on the School District or on the fair market value, at any time, of the Bonds.

THE NOTES

Description

The Notes are dated September 10, 2021 and will bear interest from that date until maturity on November 9, 2021 at the annual rate or rates specified by the purchaser. The Notes will not be subject to redemption prior to maturity.

If the Notes will be issued as registered Notes, the Notes will be registered in the name of Cede & Co., as nominee of the DTC, New York, New York. DTC will act as securities depository for the Notes. Individual purchases may be made in book-entry form only, in the principal amount of \$5,000 or any integral multiple thereof. Purchasers will not receive certificates representing their ownership interest in the Notes. Payment of the principal of and interest on the Notes will be made by the District to DTC, which will in turn remit such principal and interest to its participants for subsequent disbursement to the beneficial Owners of the Notes as described herein. See "Book-Entry Only System" herein.

If the Notes are registered in the name of the purchaser, principal of and interest on the Notes will be payable in Federal Funds at such bank or trust company(ies) located and authorized to do business in the State of New York as may be selected by the successful bidder(s). In such case, the Notes will be issued in registered form in denominations of \$5,000, or multiples thereof, as may be determined by such successful bidder(s).

Authority for and Purpose of Issue

The Notes are issued pursuant to the Constitution and Laws of the State, including the Local Finance Law, the Education Law and a revenue anticipation note resolution duly adopted by the Board of Education of the District on December 17, 2009, authorizing the District to issue revenue anticipation notes in anticipation of the collection of revenues.

Nature of Obligation

Each Note when duly issued and paid for will constitute a contract between the District and the holder thereof.

The Notes will be general obligations of the District and will contain a pledge of the faith and credit of the District for the payment of the principal thereof and the interest thereon. For the payment of such principal and interest the District has the power and statutory authorization to levy ad valorem taxes on all taxable real property in the District without limitation as to rate or amount. (See “Tax Levy Limitation Law” herein.)

Under the Constitution of the State, the District is required to pledge its faith and credit for the payment of the principal of and interest on the Notes, and the State is specifically precluded from restricting the power of the District to levy taxes on real estate therefor.

Book-Entry Only System

If the Notes are issued in book-entry form, through the Depository Trust Company (“DTC”), New York, New York, DTC will act as securities depository for the Notes. The Notes will be issued as fully-registered notes 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 bond certificate will be issued for each maturity of the Notes and will be deposited with DTC. DTC, the world’s largest depository, 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 Notes under the DTC system must be made by or through Direct Participants, which will receive a credit for the Notes on DTC’s records. The ownership interest of each actual purchaser of each bond (“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 Notes 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 Notes, except in the event that use of the book-entry system for the Notes is discontinued.

To facilitate subsequent transfers, all Notes 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 Notes 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 Notes; DTC’s records reflect only the identity of the

Direct Participants to whose accounts such Notes 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 Securities 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 Notes unless authorized by a Direct Participant in accordance with DTC's MMI Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the County 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 Notes are credited on the record date (identified in a listing attached to the Omnibus Proxy).

Principal and interest payments on the Notes 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 County, 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 District, 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 District, 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 Direct and Indirect Participants.

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

The District may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, bond 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 DISTRICT BELIEVES TO BE RELIABLE, BUT THE DISTRICT TAKES NO RESPONSIBILITY FOR THE ACCURACY THEREOF.

Source: The Depository Trust Company

DOCUMENTS ACCOMPANYING DELIVERY OF THE NOTES

Upon the delivery of the Notes, the Purchaser will be furnished with the following items: (i) a Certificate of the President of the Board of Education to the effect that as of the date of this Official Statement and at all times subsequent thereto, up to and including the time of the delivery of the Notes, this Official Statement did not and does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements herein, in the light of the circumstances under which they were made, not misleading, and further stating that there has been no adverse material change in the financial condition of the District since the date of this Official Statement to the date of issuance of the Notes; and having attached thereto a copy of this Official Statement; and (ii) a Closing Certificate evidencing the due execution of the Notes, including statements that (a) no litigation of any nature is pending or, to the knowledge of the signers, threatened, restraining or enjoining the issuance and delivery of the Notes or the levy and collection of taxes to pay the principal of and interest thereon, nor in any manner questioning the

proceedings and authority under which the Notes were authorized or affecting the validity of the Notes thereunder, (b) neither the corporate existence or boundaries of the District nor the title of the signer to his office is being contested, and (c) no authority or proceedings for the issuance of the Notes have been repealed, revoked or rescinded, and (iii) an Arbitrage Certificate executed by the President of the Board of Education, as described under "Tax Matters" herein.

MARKET FACTORS AFFECTING FINANCINGS OF THE STATE AND SCHOOL DISTRICTS OF THE STATE

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

The District is dependent, in part, on financial assistance from the State. However, if the State should experience difficulty in borrowing funds in anticipation of the receipt of the State taxes in order to pay State aid to municipalities and school districts in the State, including the District, in this year or future years, the District may be affected by a delay, until sufficient State taxes have been received by the State to make State aid payments to the District.

The District relies in part on State aid to fund its operations. There can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. Further, 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, the impact to the State's economy and financial condition due to the novel coronavirus ("COVID-19") outbreak and other circumstances, including State fiscal stress. In any event, State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. (See "State Aid" and "Recent Events Affecting New York School Districts" herein).

An outbreak of disease or similar public health threat, such as the COVID-19 outbreak, or fear of such an event, could have an adverse impact on the District's financial condition and operating results by potentially delaying the receipt of real property taxes or resulting in a delay or reduction by the State in the payment of State aid. Currently, the COVID-19 outbreak 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 continue to affect economic growth worldwide. The outbreak caused the Federal government to declare a national state of emergency, which was followed by the enactment of a variety of stimulus measures designed to address financial stability and liquidity issues caused by the outbreak. The State also declared a state of emergency and the Governor has taken steps designed to mitigate the spread and impacts of COVID-19, including closing schools and non-essential businesses. Efforts to contain the spread of COVID-19 has reduced the spread of the virus in some areas and there have been recent efforts to relax some of the restrictions put in place following the initial outbreak. Nevertheless, the outbreak of COVID-19 and the dramatic steps taken by the Federal government and State to address it are expected to negatively impact federal and local economies, including the economy of the State. The full impact of COVID-19 on the State's operations and financial condition is not expected to be known for some time. Similarly, the degree of the impact to the District's operations and finances as a result of COVID-19 is extremely difficult to predict due to the uncertainties relating to its (i) duration, and (ii) severity, as well as with regard to what actions have been or may continue to be taken by governmental and other health care authorities, including the State, to contain or mitigate its impact. The spread of the outbreak or resurgence later in the year could have a material adverse effect on the State and municipalities and school districts located in the State, including the District. The District is monitoring the situation and will take such proactive measures as may be required

to maintain its operations and meet its obligations. (See “State Aid” and “Events Affecting New York School Districts” herein).

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

TAX MATTERS

In the opinion of Timothy R. McGill, Esq. (“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 Notes is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986 (the “Code”) and 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 is of the further opinion that interest on the Notes is not a specific preference item for purposes of the Federal alternative tax. Bond Counsel expresses no opinion regarding other federal income tax consequences caused by the receipt or accrual of interest on the Notes.

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 Notes. The District has covenanted to comply with certain restrictions designed to insure that interest on the Notes will not be included in federal gross income. Failure to comply with these covenants will result in interest on the Notes 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 of New York or The City of New York, from the date of original issuance of the Notes. 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 Notes may adversely affect the value of, or the tax status of interest on, the Notes. 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 Notes.

Certain requirements and procedures contained or referred to in the Arbitrage Certificate, and other relevant documents may be changed and certain actions (including, without limitation, economic defeasance of the Notes) may be taken or omitted under the circumstances and subject to the terms and conditions set forth in such documents. Bond Counsel expresses no opinion as to any Notes or the interest thereon if any such change occurs or action is taken or omitted upon the advice or approval of counsel other than Timothy R. McGill, Esq.

Although Bond Counsel is of the opinion that interest on the Notes is excluded from gross income for federal income tax purposes and is exempt from personal income taxes imposed by the State of New York and The City of New York, the ownership or disposition of, or the accrual or receipt of interest on, the Notes may otherwise affect a 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.

LEGAL MATTERS

Legal matters incident to the authorization, issuance and sale of the Notes are subject to the approving legal opinion of Timothy R. McGill, Esq., Bond Counsel.

In particular, no opinion is expressed, or may be inferred, with respect to the direct or indirect effect of the COVID-19 pandemic and the federal, state and local government and private industry responses thereto (i) on the financial condition of the School District, or (ii) on the market price and fair market value of the Bonds at initial issuance or at any time thereafter.

DISCLOSURE UNDERTAKING

In accordance with the provisions 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") pursuant to the Securities Exchange Act of 1934, the District has agreed to provide or cause to be provided, in a timely manner not in excess of ten (10) business days after the occurrence of the event, during the period in which the Notes is outstanding, 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, notice of the occurrence of any of the following events with respect to the Notes:

- (a) principal and interest payment delinquencies;
- (b) non-payment related defaults, if material;
- (c) unscheduled draws on debt service reserves reflecting financial difficulties;
- (d) in the case of credit enhancement, if any, provided in connection with the issuance of the Note, unscheduled draws on credit enhancements reflecting financial difficulties
- (e) substitution of credit or liquidity providers, or their failure to perform
- (f) 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 or determinations with respect to the tax status of the Note, or other material events affecting the tax status of the Note;
- (g) modifications to rights of Note holders, if material;
- (h) note calls, if material and tender offers;
- (i) defeasances;
- (j) release, substitution, or sale of property securing repayment of the Note;
- (k) rating changes;
- (l) bankruptcy, insolvency, receivership or similar event of the District;
- (m) the consummation of a merger, consolidation, or acquisition involving the District or the sale of all or substantially all of the assets of the District, 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;
- (n) appointment of a successor or additional trustee or the change of name of a trustee, if material;
- (o) incurrence of a financial obligation of the District, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a financial obligation of the County, any of which affect security holders, if material; and
- (p) default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a financial obligation of the County, any of which reflect financial difficulties.

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

With respect to event (d) described above the District does not undertake to provide any notice with respect to credit enhancement added after the primary offering of the securities.

Note to event (l) described above: For purposes of the event identified in clause (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 District 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 District, 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 District.

With respect to events (o) and (p) described above, the term “financial obligation” means a (i) debt obligation; (ii) derivative instrument entered into in connection with, or pledged as security or a source of payment for, an existing or planned debt obligation; or (iii) guarantee of (i) or (ii). The term “financial obligation” shall not include municipal securities as to which a final official statement has been provided to the Municipal Securities Rulemaking Board consistent with the Rule.

The District may from time to time choose to provide notice of the occurrence of certain other events, in addition to those listed above, if the District determines that any such other event is material with respect to the Note; but the District does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above.

The District’s obligations pursuant to provide the aforementioned notices of certain events as set forth above, shall remain in full force and effect until such time as the principal of, and interest on the Notes shall have been paid in full; provided, however, that District reserves the right to terminate its obligation to provide the aforescribed notices of certain events, as set forth above, if and when the District no longer remains an obligated person with respect to the Note within the meaning of the Rule. The District acknowledges that its undertaking pursuant to the Rule described under this heading is intended to be for the benefit of the holders of the Notes (including holders of beneficial interests in the Notes). The right of holders of the Notes to enforce the provisions of the undertaking will be limited to a right to obtain specific enforcement of the District’s obligations under its Undertaking (as hereinafter defined) and any failure by the District to comply with the provisions of the undertaking will neither be a default with respect to the Notes nor entitle any holder of the Notes to recover monetary damages.

An "Undertaking to Provide Notice of Certain Events" (the “Undertaking”) to this effect shall be provided to the purchaser(s) at closing.

The District may amend the Undertaking without the consent of the holders of the Notes, provided that (a) the Undertaking, as amended, would have complied with the requirements of the Rule at the time of the offering of the Notes, after taking into account any amendments or interpretations of the Rule, as well as any change in circumstances and (b) that no such amendment shall adversely affect the interests of the holders of the Notes (including holders of beneficial interests in the Notes) in any material respect. In making such determination, the District shall rely upon an opinion of nationally recognized bond counsel.

Prior Disclosure History

For the past five years, the District has complied, in all material respects, with its continuing disclosure undertakings to provide audited annual financial statements and statements of annual financial information. That being said, over the past five years there have been a variety of ratings changes to the municipal bond insurers which insure the outstanding serial bonds of the District, as well as the underlying general obligation rating of the District. Notices of these rating changes were not timely filed in accordance with the Rule. However, notices of these insurance ratings changes based on bond insurer downgrades were filed on August 1, 2014, and notices of rating changes based on the District’s upgraded underlying rating were filed on June 20, 2016.

RATING

The District has not applied for a rating on the Notes.

Moody’s Investors Service, Inc. (“Moody’s”) has assigned an “A1” rating to the uninsured outstanding bonded indebtedness of the District.

Such rating reflects only the view of such organization, and an explanation of the significance of such rating may be obtained only from such rating agency, at the following address: Moody’s Investors Service, Inc., 7 World Trade Center at 250 Greenwich Street, New York, NY 10007. There can be no assurance that such rating will continue for any specified period of time or that such rating will not be revised or

withdrawn, if in the judgment of Moody's circumstances so warrant. Any such change or withdrawal of such rating may have an adverse effect on the market price of such bonds or the availability of a secondary market for those Notes.

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC has acted as Municipal Advisor to the District in connection with the sale of the Notes.

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, and 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 District to compile, review, examine or audit any information in the Official Statement in accordance with accounting standards. 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 Notes.

ADDITIONAL INFORMATION

Additional information may be obtained from the District's Business Manager/Treasurer, Ms. Sydney Wade, 1 Academy Street, Candor, NY 13743, phone: (607) 659-5010, email: swade@candorcs.org, or from the District's Municipal Advisor, Capital Markets Advisors, LLC, (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 District and the original purchasers or holders of any of the Notes.

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

So far as any statements made in this Official Statement involve matters of opinion or estimates whether or not expressly stated, they are set forth as such and not as representations of fact, and no representation is made that any of the statements will be realized. Neither this Official Statement nor any statement which may have been made verbally or in writing is to be construed as a contract with the holders of the Notes.

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 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 District nor Capital Markets Advisors assumes any liability or responsibility for errors or omissions on such website. Further, Capital Markets Advisors and the District 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 and the District also assume no liability or responsibility for any errors or omissions or for any updates to dated website information.

This Official Statement has been duly executed and delivered by the President of the Board of Education.

CANDOR CENTRAL SCHOOL DISTRICT

By: /s/ Hannah Murray
Hannah Murray
President of the Board of Education

Dated: August 26, 2021

APPENDIX A

THE DISTRICT

General Information

The Candor Central School District was formed in 1939. The District is located in the Towns of Candor, Tioga and Spencer in Tioga County and the Towns of Caroline and Danby in Tompkins County. The District covers approximately 87 square miles and has an estimated population of 5,500.

The District is approximately 18 miles south of Ithaca, 10 miles north of Owego and 25 miles northwest of Binghamton.

The District is primarily agricultural in nature and many residents are employed as dairy farmers. The majority of the residents commute to Ithaca, Binghamton, Syracuse and Elmira.

Major highways serving the School District include State Route #96 and Interstate #86. Air transportation is available in Elmira, Ithaca, and Binghamton.

Electricity and natural gas are provided by New York State Electric & Gas Company. Citizens Communications provides telephone service. The Village of Candor and the New York State Police provide police protection.

The School District provides public education for grades Pre K-12. Opportunities for higher education are available at the many colleges and universities in nearby Ithaca, Cortland, Binghamton and Elmira.

District Organization

Subject to the provisions of the State Constitution, the District operates pursuant to the Education Law, the Local Finance Law, other laws generally applicable to the District, and any special laws applicable to the District. Under such laws, there is no authority for the District to have a charter or adopt local laws.

The legislative power of the District is vested in the Board of Education (the "Board"). Under current law, an election is held within the District boundaries on the third Tuesday of May each year to elect members of the Board. Board members are generally elected for a term of three years.

In early July of each year, the Board meets for the purposes of reorganization. At that time, the Board elects a President and Vice President, and appoints a District Clerk and District Business Manager/Treasurer.

The major administrative officers of the District, whose duty it is to implement the policies of the Board and who are appointed by the Board, include the Superintendent of Schools, the Business Manager/Treasurer and the District Clerk.

Financial Organization

Pursuant to the Local Finance Law, the President of the Board is the chief fiscal officer of the District. However, certain of the financial functions of the District are the responsibility of the Superintendent of Schools, the School Business Official.

Budgetary Procedure

The District's fiscal year begins on July 1 and ends on June 30. Starting in the fall or winter of each year, the District's financial plan and enrollment projection are reviewed and updated and the first draft of the next year's proposed budget is developed by the central office staff. During the winter and early spring the budget is developed and refined in conjunction with the school building principals and department supervisors. Under current law, the budget is submitted to voter referendum on the third Tuesday of May each year. Summaries of the District's adopted budgets for the current and subsequent fiscal years may be found in Appendix B, herein.

The qualified voters approved the District's 2020-21 budget on June 16, 2020, pursuant to State Executive Order Nos. 202.13 and 202.26, which postponed the vote originally scheduled for May 19, 2020 due to the COVID-19 pandemic.

Financial Statements and Accounting Procedures

The financial accounts of the District are maintained in accordance with the New York State Uniform System of Accounting for School Districts. Such accounts are audited annually by independent auditors, and financial statements prepared in accordance with generally accepted accounting principles are available for public inspection upon request. A copy of the District’s most recent audited financial statement is contained in Appendix C.

School Enrollment Trends

The following table presents actual and projected school enrollment trends for the District.

TABLE 1
School Enrollment Trends

| <u>Fiscal Year</u> | <u>Actual Enrollment</u> | <u>Fiscal Year</u> | <u>Projected Enrollment</u> |
|--------------------|--------------------------|--------------------|-----------------------------|
| 2018-19 | 767 | 2021-22 | 765 |
| 2019-20 | 765 | 2022-23 | 765 |
| 2020-21 | 765 | 2023-24 | 765 |

Source: District Officials.

District Facilities

The District operates the following facilities; statistics relating to each are shown below.

TABLE 2
District Enrollment

| <u>Names</u> | <u>Grades</u> | <u>Capacity</u> | <u>Year Built</u> |
|----------------------------------|---------------|-----------------|-------------------|
| Candor Junior-Senior High School | 7-12 | 760 | 1909 |
| Candor Elementary School | Pre K - 6 | 810 | 1955 |

Employees

The District provides services through both full-time and part-time employees, all of whom are represented by the following units of organized labor.

TABLE 3
Employees

| <u>Number of Employees</u> | <u>Organization</u> | <u>Contract Expiration Date</u> |
|----------------------------|--|---------------------------------|
| 80 | Candor CSD Faculty Association | 6/30/24 |
| 80 | Candor CSD Employee’s Unit | 6/30/20* |
| 8 | Candor Administration & Supervisors Assoc. | 6/30/24 |

*Currently under negotiations.

Source: District Officials.

Employee Pension Benefits

All non-teaching and non-certified administrative employees of the School District eligible for pension or retirement benefits under the Retirement and Social Security Law of the State of New York are members of the New York and Local Employees' Retirement System ("ERS").

Teachers and certified administrators are members of the New York State Teachers' Retirement System ("TRS"). Payments to the Teachers' Retirement System are deducted from the School District's State aid payments.

Both the ERS and the TRS are non-contributing with respect to members hired prior to July 27, 1976. The Retirement Systems are non-contributory with respect to members working ten or more years. All members working less than ten years must contribute 3% of gross annual salary toward the cost of retirement programs.

According to the most recent audited financial statement included in Appendix C, the following schedule reflects the District's contribution to ERS and TRS for the last three audited fiscal years and the current budgeted year.

| | <u>ERS</u> | <u>TRS</u> |
|----------------------|------------|------------|
| 2022 <i>Budgeted</i> | \$275,000 | \$602,000 |
| 2021 <i>Budgeted</i> | 267,665 | 602,000 |
| 2020 | 261,922 | 588,296 |
| 2019 | 255,345 | 588,297 |
| 2018 | 251,011 | 610,390 |

In 2003, Chapter 49 of the Laws of 2003 amended the Retirement and Social Security Law and the Local Finance Law. The amendments empowered the State Comptroller to implement a comprehensive structural reform program for the ERS. The reform program established a minimum contribution for any local governmental employer equal to 4.5% of pensionable salaries for bills which were due December 15, 2003 and for all fiscal years thereafter, as a minimum annual contribution where the actual rate would otherwise be 4.5% or less due to the investment performance of the fund. In addition, the reform program instituted a billing system to match the budget cycle of municipalities and school districts that will advise such employers over one year in advance concerning actual pension contribution rates for the next annual billing cycle. Under the previous method, the requisite ERS contributions for a fiscal year could not be determined until after the local budget adoption process was complete. Under the new system, a contribution for a given fiscal year will be based on the valuation of the pension fund on the prior April 1 of the calendar year proceeding the contribution due date instead of the following April 1 in the year of contribution so that the exact amount may now be included in a budget.

On December 10, 2009, the Governor signed into law pension reform legislation that will provide (according to a Division of the Budget analysis) more than \$35 billion in long-term savings to State taxpayers over the next thirty years. The legislation creates a new Tier V pension level, the most significant reform of the State's pension system in more than a quarter-century. Key components of Tier V include:

- Raising the minimum age of which most civilians can retire without penalty from 55 to 62 and imposing a penalty of up to 38 percent for any civilian who retires prior to age 62.
- Requiring employees to continue contributing three percent of their salaries toward pension costs so long as they accumulate additional pension credits.
- Increasing the minimum years of service required to draw a pension from five years to 10 years.
- Capping the amount of overtime that can be considered in the calculation of pension benefits for civilians at \$15,000 per year, and for police and firefighters at 15 percent of non-overtime wages.

Members of the NYS Teachers Retirement System will have a separate Tier V benefit structure that will achieve equivalent savings as other civilian public employees. It includes:

- Raising the minimum age an individual can retire without penalty from 55 to 57 years.

- Contributing 3.5 percent of their annual wages to pension costs rather than 3.0 percent and continuing this increased contribution so long as they accumulate additional pension credits.
- Increasing the two percent multiplier threshold for final pension calculations from 20 to 25 years.

On March 16, 2012, the Governor signed into law the new Tier VI pension program, effective for new ERS and TRS employees hired after April 1, 2012. The Tier VI legislation provides, among other things, for increased employee contribution rates of between 3% and 6%, an increase in the retirement age from 62 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 VI employees will vest in the system after ten years of employment and will continue to make employee contributions throughout employment.

Pension reform legislation enacted in 2003 and 2004 changed the cycle of ERS billing to match budget cycles of the District. Under the previous method, the District was unsure of how much it paid to the system until after its budget was implemented. Under the current method the contribution for a given fiscal year will be based on the value of the pension fund on the prior April 1 instead of the following April 1 so that the District will be able to more accurately include the cost of the contribution into its budget. The reform legislation also (i) required the District to make a minimum contribution of 4.5% of payroll every year, including years in which the investment performance of the fund would make a lower contribution possible and (ii) moved the annual payment date for contributions from December 15th to February 1st, effective December 15, 2004.

The New York State ERS rate for the 2020-21 fiscal year was 16.2%. The 2021-22 ERS rate will increase to 18.3%. The 2020-21 TRS rate was 9.53%. The 2021-22 TRS rate is 9.80%.

Due to poor performance of the investment portfolio of the State Retirement System during the recent financial crisis, the employer contribution rates for required pension payments to the TRS and ERS increased substantially, although have stabilized in recent years. To help mitigate the impact of such increases, legislation was enacted that permitted school districts to amortize a portion of its annual employer pension payment to the ERS only. Under such legislation, school districts that choose to amortize were required to set aside and reserve funds with the ERS for certain future rate increases. The District has not amortized any of its employer pension payments pursuant to this legislation and expects to continue to pay all payments in full when due.

In Spring 2013, the State and TRS approved a Stable Contribution Option (“SCO”) that gives school districts the ability to better manage the spikes in Actuarially Required Contribution rates (“ARCs”). ERS followed suit and modified its existing SCO, which was adopted in 2010. Each plan allows school districts to pay the SCO amount in lieu of the ARC amount, which is higher, and defer the difference in payment amounts as described below. The plan, which was approved in Governor Cuomo’s 2014-15 budget would let districts contribute 14.13% of employee costs toward pensions. The District did not opt into the pension smoothing plan.

The TRS SCO deferral plan is available to school districts for the next 7 years. Under the TRS SCO plan, payment of the deferred amount will commence in year six of the program (2018-19) and continue for five years. School districts can elect to no longer participate in the plan at any time, resume paying the ARC and begin repayment of deferred amounts over five years. Under the ERS SCO, payment of deferred amounts begins the year immediately following the deferral and the repayment period is 12 years. Once made, the election to participate in the ERS SCO is permanent. However, the school districts can choose not to defer payment in any given year. In both plans, interest on the deferred amounts is based on the yield of 10-year U.S. Treasury securities plus 1%.

The primary benefit of participation in the SCO plans is the elimination of the uncertainty in the volatility of future pension contribution ARCs in the near term, thereby providing school districts with significant assistance in its ability to create a stable and reliable fiscal plan. The District has not and does not plan to participate in the ERS or TRS SCO program.

Other Post-Employment Benefits

The District provides post-retirement healthcare benefits to various categories of former employees. These costs have been rising substantially, and may be expected to rise substantially in the future. School districts and Boards of Cooperative Education Services, unlike other municipal units of government in the State, have been prohibited from reducing retiree health benefits or increasing health care contributions received or paid by retirees below the level of benefits or contributions afforded to or required from active employees. This protection from unilateral reduction of benefits had been extended annually by the New York State Legislature until recently when legislation was enacted to make permanent these health insurance benefit protections for retirees. Legislative attempts to provide similar protection to retirees of other local units of government in the State have not succeeded as of the date hereof. Nevertheless, many such retirees of all varieties of municipal units in the State do presently receive such benefits.

Effective July 1, 2016, the District adopted 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. This statement requires the District to recognize the total OPEB liability and related deferred outflows and deferred inflows of resources. The cumulative effect of implementing this required change in accounting principle resulted in a restatement of beginning net position. This statement addresses accounting and financial reporting for other postemployment benefits offered by the District and requires various note disclosures and required supplementary information.

The District is in compliance with the requirements of GASB 75, and a summary of the actuarial valuation is included in the District's June 30, 2020 Financial Audit attached herein. The following table summarizes the District's annual OPEB statements for the year ended June 30, 2020:

| | <u>Total OPEB</u> <u>Liability</u> |
|--|---|
| Balance at June 30, 2019 | \$59,942,836 |
| Changes for the year: | |
| Service cost | 1,821,909 |
| Interest cost | 2,171,824 |
| Changes of benefit terms | (5,603,595) |
| Changes in assumptions or other inputs | 1,569,242 |
| Benefit payments | <u>(1,290,529)</u> |
| Net change | <u>(1,331,149)</u> |
| Balance at June 30, 2020 | <u>\$53,611,687</u> |

Source: Audited Financial Statements

Actuarial Valuation will be required every 2 years for OPEB plans with more than 200 members, every 3 years if there are less than 200 members.

The District continues funding the expenditure on a pay-as-you-go basis.

Investment Policy/Permitted Investments

Pursuant to State law, including Sections 10 and 11 of the General Municipal Law (the "GML"), the District is generally permitted to deposit moneys in banks and trust companies located and authorized to do business in the State. All such deposits, including special time deposit accounts and certificates of deposit, in excess of the amount insured under the Federal Deposit Insurance Act, are required to be secured in accordance with the provisions of and subject to the limitations of Section 10 of the GML.

The District may also temporarily invest moneys in: (1) obligations of the United States of America; (2) obligations guaranteed by agencies of the United States of America where the payment of principal and interest are guaranteed by the United States of America; (3) obligations of the State of New York; (4) with the approval of the New York State Comptroller, in tax anticipation notes or revenue anticipation notes issued by any municipality, school district, or district corporation, other than those bonds issued by the

District; (5) certificates of participation issued by political subdivisions of the State pursuant to Section 109-b(10) of the GML; (6) obligations of a New York public benefit corporation which are made lawful investments for municipalities pursuant to the enabling statute of such public benefit corporation; or (7) in the case of moneys held in certain reserve funds established by the District pursuant to law, in obligations of the District.

All of the foregoing instruments and investments are required to be payable or redeemable at the option of the owner within such times as the proceeds will be needed to meet expenditures for purposes for which the moneys were provided and, in the case of instruments and investments purchased with the proceeds of bonds or notes, shall be payable or redeemable in any event, at the option of the owner, within two years of the date of purchase. Unless registered or inscribed in the name of the District, such instruments and investments must be purchased through, delivered to and held in custody of a bank or trust company in the State pursuant to a written custodial agreement as provided in Section 10 of the GML.

The Board of Education had adopted an investment policy and such policy conforms with applicable laws of the State governing the deposit and investment of public moneys. All deposits and investments of the District are made in accordance with such policy.

FINANCIAL FACTORS

District finances are operated primarily through its General Fund. All taxes and most other revenues are paid into this fund and all current operating expenditures are made from it. A Statement of Revenues and Expenditures for the five-year period ending June 30th is contained in Appendix B.

Real Property Taxes

The District derives a major portion of its revenues from a tax on real property (see “Statement of Revenues, Expenditures and Changes in Fund Balance-General Fund” in Appendix B, herein). Property taxes accounted for 27.0% of total general fund revenues for the fiscal year ended June 30, 2020, while State aid accounted for 65.2%.

The following table sets forth total general fund revenues and real property tax revenues during the last five audited fiscal years and the amounts budgeted for the previous and current fiscal years.

TABLE 4
Property Taxes

| <u>Fiscal Year</u> <u>Ending June 30:</u> | <u>Total</u> <u>Revenues⁽¹⁾</u> | <u>Real Property</u> <u>Taxes &</u> <u>Tax Items⁽²⁾</u> | <u>Real Property</u> <u>Tax Revenues to</u> <u>Revenues</u> |
|--|---|---|--|
| 2016 | \$16,414,965 | \$5,317,758 | 32.4% |
| 2017 | 17,100,533 | 5,361,974 | 31.4% |
| 2018 | 18,057,455 | 4,640,393 | 25.7% |
| 2019 | 17,211,266 | 4,769,420 | 27.7% |
| 2020 | 18,158,084 | 4,905,670 | 27.0% |
| 2021 <i>Budget</i> | 18,880,726 | 5,889,866 | 31.2% |
| 2022 <i>Budget</i> | 19,001,466 | 5,963,489 | 31.4% |

(1) General Fund only.

(2) Budgeted Real Property Tax includes STAR – School Tax Exemption

Source: Audited Financial Statements and Adopted Budgets of the District.

State Aid

The District receives State aid for operating and other purposes at various times throughout its fiscal year, pursuant to formulas and payment schedules set forth by statute.

The following table sets forth total general fund revenues and State aid revenues during the last five audited fiscal years and the amounts budgeted for the previous and current fiscal years.

TABLE 5
State Aid

| Fiscal Year <u>Ending June 30:</u> | Total <u>Revenues</u> ⁽¹⁾ | Total <u>State Aid</u> | Percentage of Total Revenues <u>Consisting of State Aid</u> |
|---|---|---|--|
| 2016 | \$16,414,965 | \$10,791,117 | 65.7% |
| 2017 | 17,100,533 | 11,097,321 | 64.9% |
| 2018 | 18,057,455 | 11,785,734 | 65.3% |
| 2019 | 17,211,266 | 10,915,989 | 63.4% |
| 2020 | 18,158,084 | 11,833,970 | 65.2% |
| 2021 <i>Budget</i> | 18,880,726 | 12,130,860 | 64.2% |
| 2022 <i>Budget</i> | 19,001,466 | 12,612,977 | 66.4% |

Source: Audited Financial Statements and Adopted Budgets of the District.

In addition to the amount of State Aid budgeted by the District in its 2018-19 fiscal year, the State is expected to make payments of STAR aid representing tax savings provided by school districts to their taxpayers under the STAR (see “STAR-School Tax Exemption”) Program. The District expects to receive timely receipt of STAR aid for the remainder of the current fiscal year.

In January 2001, the State Supreme Court issued a decision in *Campaign for Fiscal Equity (“CFE”) v. New York* mandating that the system of apportionment of State aid to school districts within the State be restructured by the Governor and the State Legislature. On June 25, 2002, the Appellate Division of the State Supreme Court reversed that decision. On June 26, 2003, the State Court of Appeals, the highest court in the State, reversed the Appellate Division, holding that the State must, by July 30, 2004, ascertain the actual cost of providing a sound basic education, enact reforms to the system of school funding and ensure a system of accountability for such reforms. The Court of Appeals further modified the decision of the Appellate Division by deciding against a Statewide remedy and instead limited its ruling solely to the New York City school system.

A case related to the Campaign for Fiscal Equity, Inc. v. State of New York is scheduled to be heard on appeal on May 30, 2017 in *New Yorkers for Students’ Educational Rights (“NYSER”) v. State of New York* and a consolidated case on the right to a sound basic education. The NYSER lawsuit asserts that the State has failed to comply with the original decision in the Court of Appeals in the Campaign for Fiscal Equity case, and asks the Court of Appeals to require the State to develop new methodologies, formulas and mechanisms for determining State aid, to fully fund the “foundation aid” formula, to eliminate the supermajority requirement for voter approval of budgets which increase school district property tax levies above the property tax cap limitation, and related matters. It is not possible to predict the outcome of this litigation.

While the increases in State aid following this case have been targeted to high needs schools and other schools did share in the overall increase of State aid. The District is unable to predict whether this pattern of distribution will continue beyond that which is included in later legislation dealing with foundation aid. Increased State aid for New York City schools and other high needs schools may result in reductions in the future of State aid to certain school districts, including the District.

In any event, the outcome of this matter does not affect the validity of any obligations issued by the District, including the Notes, nor the ability of the District to levy taxes on the taxable real property in the District to pay the Notes and the interest thereon as the same shall become due and payable.

The Gap Elimination Adjustment (“GEA”) law was first introduced for the 2010-11 fiscal year (although it existed in 2009-10 and was called “Deficit Reduction Assessment”) as a way to help close the State’s then \$10 billion budget deficit. Under legislation, a portion of the funding shortfall at the state level is divided among all school districts throughout the State and reflected as a reduction in school district state aid. The GEA is a negative number, money that is deducted from the aid originally due to the District. Since the program began, the GEA and Deficit Reduction Assessment reduction in State aid for the District has amounted to approximately \$644,985 annually. As a result, the District has been forced to reduce

programs, services, and staff accordingly. Beginning in the 2014-15 fiscal year, the State made modest restorations to the GEA. In the 2014-15 fiscal year, the GEA was reduced by \$400,881, dropping the total GEA to \$244,104. In the 2015-16 fiscal year, it has been further reduced by \$179,929, yielding a remaining GEA of \$64,175. In the 2016-17 fiscal year, the GEA was eliminated.

The Smart Schools Bond Act was passed as part of the Enacted 2014-2015 State Budget. The Smart Schools Bond Act authorizes the issuance of \$2 billion of general obligation bonds to finance improved educational technology and infrastructure to improve learning and opportunity for students throughout the State. The District's estimated allocation of funds is \$928,906.

There can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. The State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. The availability of such monies and the timeliness of such payment could be affected by a delay in the adoption of the State budget. In any event, State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefor.

Recent Events Affecting New York School Districts

School district fiscal year (2014-15): The State Legislature adopted the State budget on April 1, 2014. The budget included an increase of \$807 million in State aid for school districts totaling \$21.88 billion in State aid for New York school districts.

School district fiscal year (2015-16): The State Legislature adopted the State budget on April 1, 2015. The budget provides for school aid of approximately \$23.5 billion, which represents an increase of approximately \$1.3 billion, or 7.4%, in total school aid spending from the 2014-15 school year. The budget continues a three-year appropriation methodology established in the 2011-12 State fiscal year and limits future school aid increases to growth as measured by the total personal income of residents of the State.

School district fiscal year (2017-18): The State budget included an increase of \$1.1 billion in State Aid to school districts, including a \$700 million increase in Foundation Aid. The budget included School Aid spending of \$25.8 billion, an increase of 4.4% from the prior fiscal year.

School district fiscal year (2018-19): The budget increased Education Aid by \$1 billion, including a \$619 million increase in Foundation Aid, without revision to the formula, bringing the new Education Aid total to \$26.7 billion or an increase of 3.9 percent.

School district fiscal year (2019-20): The budget increased Education aid by more than was \$1 billion which included a \$618 million dollar increase in Foundation Aid. The new Education Aid total is \$27.9 billion — an increase of 3.8%. The budget directed a majority of such additional funding (over 70%) to the State's more economically disadvantaged school districts.

School district fiscal year (2020-21): Due to the below-described decrease in State revenues as a result of the COVID-19 pandemic, the State budget included an increase of only \$95 million in State Aid (0.035% increase from the prior budget year), and Foundation Aid remained at essentially the same level as it was during the 2019-2020 fiscal year. While the budget actually included a decrease in State Aid (referred to as a "Pandemic Adjustment"), the decrease in State aid would 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 (2021-22): The State budget includes large-scale increases in State aid to school districts, including a \$105 million expansion of full-day prekindergarten that will provide funding to 200 school districts that didn't previously receive State funding for such full-day prekindergarten programs. In contrast to the 2020-21 budget, this budget provides that additional federal aid would supplement, not supplant, State funding. Most notably, Foundation Aid is increased by \$1.4 billion (7.6%), and the State

has committed to a three-year phase-in of the restoration of the full Foundation Aid formula to finally fulfill the State's commitments from the Campaign for Fiscal Equity case from the early 2000s.

The City of New York was an early epicenter of the COVID-19 pandemic in the United States, and as a result the State suffered significant revenue shortfalls and unanticipated expenses beginning at the end of the State's 2019-2020 fiscal year, and continuing during the State's 2020-2021 fiscal year.

In response, the enacted State budget for the 2020-21 fiscal year allowed the State to reduce expenditures (including aid to local school districts and municipalities) if tax receipts were lower than anticipated. Accordingly, in June, 2020 the State Division of the Budget ("DOB") began withholding 20 percent of most local aid payments, although such aid has generally since been restored.

Many of the State's 2020-2021 budget decisions were based on the uncertainty of future federal aid. In the period of time since such decisions were made, the \$1.9 trillion American Rescue Plan Act was signed into law (on March 11, 2021), which legislation includes almost \$24 billion in funding for various levels of government in the State, including approximately \$12.5 billion for the State, \$6 billion for New York City, and \$4 billion to be divided among counties in the State; another \$12 billion is intended to be used toward the safe reopening of K-12 schools as well as colleges and universities.

Accordingly, the State enacted budget for the 2021-2022 fiscal year is more expansive (about 10% higher) than the prior budget, including significantly increased funding for schools and local governments. School districts will benefit from a \$1.4 billion increase in Foundation Aid and a three-year Foundation Aid full restoration phase-in that will allow all school districts to receive the increased level of Foundation Aid that was originally promised in 2007, along with a \$105 million expansion of full-day prekindergarten that will provide funding to 200 school districts that didn't previously receive state funding for such full-day kindergarten programs. In contrast to the 2020-21 budget, this budget provides that additional federal aid would supplement, not supplant, State funding. Most notably, Foundation Aid increased by \$1.4 billion (7.6%), and the State has committed to a three-year phase-in of the restoration of the full Foundation Aid formula to finally fulfill the State's commitments from the Campaign for Fiscal Equity case from the early 2000s. Local governments will receive a full restoration of proposed cuts to Aid and Incentives for Municipalities (AIM) funding. Further, municipalities that host Video Lottery Terminal (VLT) facilities will receive a full restoration of \$10.3 million in proposed VLT aid cuts.

Although the 2021-2022 budget contains additional aid for school districts and municipalities, it is uncertain whether the State will have future budget shortfalls necessitating cuts to State aid. Reductions in the payment of State aid could adversely affect the financial condition of school districts in the State, including the District. See "COVID-19," herein, for further details on the COVID-19 pandemic and its effects on the State.

The Budget for the 2021-22 fiscal year provides \$13.26 million of State Aid to the District, a 8.60% increase from the District's 2020-21 school year.

The School District presently anticipates an increase in its foundation aid for its 2020-2021 fiscal year in an amount of \$376,607.

It should also be noted that the School District receives federal aid for certain programs. In its last audited fiscal year, the School District did not receive federal aid. It is not possible to predict whether such aid will continue in the future, or if continued, whether it will be funded at present levels.

The District cannot predict at this time whether there will be any reductions in and/or delays in the receipt of State aid during the District's 2020-21 fiscal year. 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.

Other Revenues

In addition to property taxes and State Aid, the District receives other revenues from miscellaneous sources as shown in Appendix B.

The State Comptroller's Fiscal Stress Monitoring System

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 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 District as "Susceptible Fiscal Stress" (see <https://www.osc.state.ny.us/sites/default/files/local-government/documents/pdf/2020-04/2019-munis-summary.pdf>).

New York State Comptroller's Audit

Many school districts throughout the state can be subject to an audit of the New York State Office of the Comptroller ("OSC") pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

On November 27, 2015, OSC, Division of Local Government and School Accountability released an audit of the District to determine if District officials are ensuring that meals offered to students are both nutritious and economically prepared for the period July 1, 2013 to March 19, 2015. The audit found that, while the District is serving nutritious meals, the meals are more costly to prepare than the revenue generated by the sales and are not effectively produced as determined by industry averages for meals produced per labor hour. The audit recommended that the District more closely monitor cafeteria operational costs, implement plans to control the costs of production, and monitor the productivity rate with the aim of increasing efficiency.

The link to the OSC report is as follows:

<http://www.osc.state.ny.us/localgov/audits/schools/2015/candor.pdf>.

The OSC has not conducted any other audits of the District in the past three years.

TAX INFORMATION

Real Property Tax Assessments and Rates

TABLE 6
Real Property Tax Assessments and Rates
(Fiscal Years Ending June 30)

| | <u>2018</u> | <u>2019</u> | <u>2020</u> | <u>2021</u> | <u>2022</u> |
|----------------------------------|---------------|---------------|---------------|---------------|---------------|
| Town of Candor | | | | | |
| Assessed Value | \$209,169,011 | \$209,817,266 | \$211,635,327 | \$212,859,230 | \$213,982,681 |
| Equalization Rate ⁽²⁾ | 98.00% | 96.00% | 97.00% | 93.00% | 92.00% |
| Full Value | \$213,437,766 | \$218,559,652 | \$218,180,749 | \$228,880,892 | \$232,589,871 |
| Tax Rate ⁽¹⁾ | \$22.76 | \$23.20 | \$23.28 | \$23.67 | \$24 |
| Town of Spencer | | | | | |
| Assessed Value | \$3,333,270 | \$3,304,278 | \$3,467,116 | \$3,937,230 | \$3,937,230 |
| Equalization Rate ⁽²⁾ | 95.00% | 95.00% | 90.00% | 100.00% | 100.00% |
| Full Value | \$3,508,705 | \$3,478,187 | \$3,852,351 | \$3,937,230 | \$3,937,230 |
| Tax Rate ⁽¹⁾ | \$23.48 | \$23.44 | \$25.09 | \$22.01 | \$22 |
| Town of Tioga | | | | | |
| Assessed Value | \$354,749 | \$333,944 | \$330,831 | \$330,805 | \$330,680 |
| Equalization Rate ⁽²⁾ | 6.60% | 6.60% | 6.40% | 5.90% | 6.00% |
| Full Value | \$5,374,985 | \$5,059,758 | \$5,169,234 | \$5,606,864 | \$5,511,333 |
| Tax Rate ⁽¹⁾ | \$337.92 | \$337.42 | \$352.79 | \$373.06 | \$366 |
| Town of Caroline | | | | | |
| Assessed Value | \$25,907,893 | \$26,605,203 | \$27,851,591 | \$28,326,498 | \$28,372,810 |
| Equalization Rate ⁽²⁾ | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% |
| Full Value | \$25,907,893 | \$26,605,203 | \$27,851,591 | \$28,326,498 | \$28,372,810 |
| Tax Rate ⁽¹⁾ | \$22.30 | \$22.27 | \$22.58 | \$22.01 | \$22 |
| Town of Danby | | | | | |
| Assessed Value | \$817,702 | \$805,039 | \$841,215 | \$841,081 | \$830,596 |
| Equalization Rate ⁽²⁾ | 100.00% | 100.00% | 100.00% | 100.00% | 100% |
| Full Value | \$817,702 | \$805,039 | \$841,215 | \$841,081 | \$830,596 |
| Tax Rate ⁽¹⁾ | \$22.30 | \$22.27 | \$22.57 | \$22.01 | \$22 |
| Total: | | | | | |
| Assessed Value | \$239,582,625 | \$240,865,730 | \$244,126,080 | \$246,294,844 | \$247,453,997 |
| Full Value | \$249,047,051 | \$254,507,839 | \$255,895,141 | \$267,592,566 | \$271,241,840 |
| Tax Levy | \$5,554,417 | \$5,667,821 | \$5,777,777 | \$5,889,866 | \$5,963,489 |

Per \$1,000

(1) The equalization rates shown here were used to apportion the school tax levies and may not be the same as those required for debt limit purposes.

Source: School Officials

Tax Limit

The Constitution does not limit the amount that may be raised by the District-wide tax levy on real estate in any fiscal year. See, however, the discussion immediately below under the sub heading “Tax Levy Limit Law.”

Tax Levy Limit Law

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 all local governments, including school districts (with the exception of New York City, and the counties comprising New York City). The discussion herein does not include school districts in New York City, Buffalo, Rochester, Syracuse, or Yonkers.

Prior to the enactment of the Tax Levy Limitation Law, there was no statutory limitation on the amount of real property taxes that a school district could levy as part of its budget if its budget had been approved by a simple majority of its voters. In the event the budget had been defeated by the voters, the school district was required to adopt a contingency budget. Under a contingency budget, school budget increases were limited to the lesser of four percent (4%) of the prior year’s budget or one hundred twenty percent (120%) of the consumer price index (“CPI”).

The Tax Levy Limitation Law now requires that a school district submit its proposed tax levy to the voters each year beginning with the 2012-2013 fiscal year.

The Tax Levy Limitation Law restricts, among other things, the amount of real property taxes that may be levied by or on behalf of a school district in a particular year. It expires on June 16, 2020. Pursuant to the Tax Levy Limitation Law, the tax levy of a school district cannot increase by more than the lesser of (i) two percent (2%) or (ii) the annual increase in the CPI, over the amount of the prior year’s tax levy. Certain adjustments would be permitted for taxable real property full valuation increases or changes in physical or quantity growth in the real property base as defined in Section 1220 of the Real Property Tax Law. A school district could exceed the tax levy limitation for the coming fiscal year only if the voters of such school district first approve a budget by at least 60% affirmative vote of those voting to override such limitation for such coming fiscal year only. Tax levies that do not exceed the limitation will only require approval by at least 50% of those voting. A school district’s calculation of each fiscal year’s tax levy limit is subject to review by the Commissioner of Education and the Commissioner of Taxation and Finance prior to adoption of each fiscal year budget.

There are exceptions for school districts 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, and the Teachers’ Retirement System. School districts are also permitted to carry forward a certain portion of their unused levy limitation from a prior year.

There is also an exception for school districts for “Capital Local Expenditures” subject to voter approval where required by law. This term is defined in a manner that does not include certain items for which a school district may issue debt including the payment of judgments or settled claims, including tax certiorari payments, and cashflow borrowings including tax anticipation notes, revenue anticipation notes, budget notes and deficiency notes. “Capital Local Expenditures”, are defined as “the taxes associated with budgeted expenditures resulting from the financing, refinancing, acquisition, design, construction, reconstruction, rehabilitation, improvement, furnishing and equipping of or otherwise providing for school district capital facilities or school district capital equipment, including debt service and lease expenditures, and transportation capital debt service, subject to the approval of the qualified voters where required by law”. The portion of the tax levy necessary to support “Capital Local Expenditures” is defined as the “Capital Tax Levy”, and this is an exclusion from the tax levy limitation.

Article 8 Section 2 of the State Constitution requires every issuer of general obligation notes and bonds in the State to pledge its faith and credit for the payment of the principal thereof and the interest thereon. This has been interpreted by the Court of Appeals, the State’s highest court, in *Flushing National Bank v. Municipal Assistance Corporation for the City of New York*, 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 that is what courts have held they mean."

Article 8 Section 12 of the State Constitution specifically provides as follows:

"It shall be the duty of the legislature, subject to the provisions of this constitution, to restrict the power of taxation, assessment, borrowing money, contracting indebtedness, and loaning the credit of counties, cities, towns and villages, so as to prevent abuses in taxation and assessments and in contracting of indebtedness by them. Nothing in this article shall be construed to prevent the legislature from further restricting the powers herein specified of any county, city, town, village or school district to contract indebtedness or to levy taxes on real estate. The legislature shall not, however, restrict the power to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted."

On the relationship of the Article 8 Section 2 requirement to pledge the faith and credit and the Article 8 Section 12 protection of the levy of real property taxes to pay debt service on bonds subject to the general obligation pledge, the Court of Appeals in the *Flushing National Bank* case stated:

"So, too, although the Legislature is given the duty to restrict school districts 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 of 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 municipal corporations.

Therefore, while the Tax Levy Limitation Law may constrict a school district'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 for other than Capital Local Expenditures after June 24, 2011, it is clear that no statute is able (1) to limit a school district's pledge of its faith and credit to the payment of any of its general obligation indebtedness or (2) to limit a school district'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 school district authority to treat debt service payments as a constitutional exception to any such statutory tax levy limitation is not clear.

It is possible that the Tax Levy Limitation Law will be subject to judicial review to resolve the constitutional issues raised by its adoption. Although courts in New York have historically been protective of the rights of holders of general obligation debt of political subdivisions, the outcome of any such legal challenge cannot be predicted.

Tax Collection Procedure

The real property taxes of the District are collected by the Town. Such taxes are due on September 6, and may be paid without penalty through October 6. The Town pays to the District the amounts collected on a periodic basis. The penalty on unpaid taxes is 2% from October 6 to October 31 and additional 1% for each month thereafter. On or about November 6, the District files a report of any uncollected District taxes with the Counties. The Counties thereafter on or before April pays to the District the full amount of its

uncollected taxes. Thus, the full amount of the District’s real property tax levy is collected by the District in the fiscal year of the levy. The Counties have the power to issue and sell tax anticipation notes to fund the reimbursement of uncollected taxes due to the District.

The District is not responsible for the collection of taxes of any other unit of government.

STAR - School Tax Exemption

The STAR (School Tax Relief) program provides State-funded exemptions from school property taxes to homeowners for their primary residences. School districts are reimbursed by the State for real property taxes exempted pursuant to the STAR Program.

Homeowners over 65 years of age with subject to certain household income limitations are eligible as follows:

| <u>Towns of:</u> | <u>Enhanced Exemption</u> | <u>Basic Exemption</u> |
|------------------|---------------------------|------------------------|
| Candor | \$65,750 | \$27,900 |
| Spencer | 70,700 | 30,000 |
| Tioga | 4,170 | 1,770 |
| Caroline | 70,700 | 30,000 |
| Danby | 70,700 | 30,000 |

Date Certified: 04/9/2021

The enhanced or basic STAR exemption is the amount that an assessment will be reduced prior to the levy of school taxes. For example, if a home is assessed at \$150,000 and the enhanced STAR exemption for a municipality is \$50,000, the school taxes on the property would be paid on a taxable assessment of \$100,000 (\$150,000 - \$50,000 = \$100,000).

Since the 2012-13 school tax bills, there has been a 2% limit on STAR savings increases, the savings results from the Basic or Enhanced STAR exemptions are limited to a 2% increase over the prior year. When school district initially calculates their tax bills, for each municipal segment they will compare the amount of STAR savings to the maximum. If the STAR savings exceeded the maximum, the school district will use the maximum when calculating tax bills for the segment.

The maximum savings for each of the municipalities within the District for the 2021-22 are as follows:

| <u>Towns of:</u> | <u>Basic Maximum Savings</u> | <u>Enhanced Maximum Savings</u> |
|------------------|------------------------------|---------------------------------|
| Candor | \$569 | \$1,136 |
| Spencer | 660 | 1,350 |
| Tioga | 556 | 1,113 |
| Caroline | 645 | 1,293 |
| Danby | 645 | 1,293 |

Date Certified: 03/26/2021

The District received full reimbursement of such exempt taxes from the State during the current fiscal year.

Ten of the Largest Taxpayers

The following table presents the taxable valuations of the District’s ten largest taxpayers on the 2020 Assessment Roll of the District used to levy 2020-21 taxes.

TABLE 7
Taxable Assessments

| <u>Taxpayer</u> | <u>Nature of Business</u> | <u>Taxable Valuation</u> ⁽¹⁾ | <u>Taxable Assessed Valuation</u> |
|-----------------------------|----------------------------------|--|--|
| NYS Electric & Gas Corp. | Utility | \$6,030,184 | 2.45% |
| State of New York | State Lands | 5,617,480 | 2.28% |
| Inergy Pipeline East, LLC | Pipeline | 2,495,233 | 1.01% |
| Double Aught Lumber, Inc. | Lumber Mill | 1,530,000 | 0.62% |
| Cotton-Hanlon Inc. | Lumber Mill | 1,384,600 | 0.56% |
| Phillip R. Beebe | Agriculture | 1,010,027 | 0.41% |
| Midwest XX, LLC | Golf Course | 965,000 | 0.39% |
| Robinson Family, LLC | Utility | 861,280 | 0.35% |
| Sunrise Communities | Farm | 126,000 | 0.05% |
| Millennium Pipeline Co, LLC | Pipeline | <u>62,243</u> | <u>0.03%</u> |
| | | <u>\$20,82,047</u> | <u>8.15%</u> |

⁽¹⁾ Represents 8.15% of the District’s 2020 Assessed Valuation of \$246,294,844 used to levy 2020-21 taxes.

Source: District Officials

DISTRICT INDEBTEDNESS

Constitutional Requirements

The New York State Constitution limits the power of the District (and other municipalities and school districts 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 District and the Notes.

Purpose and Pledge. The District shall not give or loan any money or property to or in aid of any individual or private corporation or private undertaking or give or loan its credit to or in aid of any of the foregoing or any public corporation.

The District may contract indebtedness only for a District 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 period of probable usefulness of the object or purpose determined by statute; no installment may be more than fifty per centum in excess of the smallest prior installment, unless the District has authorized the issuance of indebtedness having substantially level or declining annual debt service. The District 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.

General. The District is further subject to constitutional limitation by the general constitutionally imposed duty on the State Legislature to restrict the power of taxation and contracting indebtedness to prevent abuses in the exercise of such power; however, as has been noted under “Nature of Obligation”, the State

Legislature is prohibited by a specific constitutional provision from restricting the power of the District to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted.

Statutory Procedure

In general, the State Legislature has, by the enactment of the Local Finance Law, authorized the powers and procedure for the District 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 Education Law.

The District is generally required by such laws to submit propositions for the expenditure of money for capital purposes to the qualified electors of the District. Upon approval thereby, the Board of Education may adopt a bond resolution authorizing the issuance of bonds and notes in anticipation of the bonds. With respect to certain school building construction projects, the District is not permitted to spend in excess of \$100,000 until the plans and specification for such project have been approved by the Commissioner of Education of the State.

The Local Finance Law also provides a twenty-day statute of limitations after publication of a bond resolution, together with a statutory form of notice which, in effect, stops legal challenges to the validity of obligations authorized by such bond resolution except for alleged constitutional violations. The District has complied with such procedure with respect to the bond resolution under which the Notes are being issued.

The Board of Education, as the finance board of the District, has the power to enact tax anticipation note resolutions. Such resolutions may authorize the issuance of tax anticipation notes in an aggregate principal amount necessary to fund anticipated cash flow deficits but in no event exceeding the amount of real property taxes levied or to be levied by the District, less any tax anticipation notes previously issued and less the amount of such taxes previously received by the District.

The Board of Education, as the finance board of the District, also has the power to authorize the sale and issuance of bonds and notes, including the Notes. However, such finance board may delegate the power to sell such bonds and notes to the President of the Board of Education, the chief fiscal officer of the District, pursuant to the Local Finance Law.

Debt Limit. Pursuant to the Local Finance Law, the District has the power to contract indebtedness for any District purpose authorized by the Legislature of the State of New York provided the aggregate amount thereof shall not exceed ten per centum of the full valuation of taxable real estate of the District and subject to certain enumerated exclusions and deductions such as State aid for building purposes. The constitutional and statutory method for determining full valuation consists of taking the assessed valuation of taxable real estate for the last completed assessment roll and applying thereto the ratio (equalization rate) which such assessed valuation bears to the full valuation; such ratio is determined by the State Board of Real Property Services. The State Legislature is required to prescribe the manner by which such ratio shall be determined by such authority.

Statutory Debt Limit and Net Indebtedness

TABLE 8
Statutory Debt Limit and Net Indebtedness
(As of August 26, 2021)

| <u>Town</u> | <u>Assessed Valuation</u> | <u>Equalization Rate</u> | <u>Full Valuation</u> |
|---|--------------------------------------|-------------------------------------|----------------------------------|
| Candor | \$213,982,681 | 92.00% | \$232,589,871 |
| Spencer | 3,937,230 | 100.00% | 3,937,230 |
| Tioga | 330,680 | 6.00% | 5,511,333 |
| Caroline | 28,372,810 | 100.00% | 28,372,810 |
| Danby | 830,596 | 100.00% | <u>830,596</u> |
| Total Full Valuation of Taxable Real Property | | | \$271,241,840 |
| Debt Limit (10% of Full Valuation) | | | \$27,124,184 |
| Outstanding Indebtedness (Principal Only): | | | |
| Bonds | | | 16,040,000 |
| BANs | | | <u>0</u> |
| Gross Indebtedness | | | <u>16,040,000</u> |
| Less: Exclusions ⁽¹⁾ | | | <u>0</u> |
| Total Net Indebtedness | | | <u>\$ 16,040,000</u> |
| Net Debt-Contracting Margin | | | <u>\$11,084,184</u> |
| Percentage of Debt-Contracting Margin Exhausted | | | <u>59.14%</u> |

⁽¹⁾ In prior years the District received State debt service building aid in a calculated amount of approximately 90.7% of its outstanding bonded indebtedness. Given the new "assumed amortization" of State building aid as provided in Chapter 383 of the Laws of 2001, no assurance can be given regarding the direct or indirect effect that "assumed amortization" will have on the net indebtedness of the District, or the timing or amount of such Building aid in connection with school facilities financed with the proceeds of the issuance of bonds or notes. See also "State Aid" herein.

Remedies Upon Default

Section 99-b of the State Finance Law (the "SFL") provides for a covenant between the State of New York (the "State") and the purchasers and the holders and owners from time to time of the bonds and notes issued by school districts in the State for school purposes that it will not repeal, revoke or rescind the provisions of Section 99-b of the SFL, or amend or modify the same so as to limit, impair or impede the rights and remedies granted thereby.

Said section provides that in the event a holder or owner of any bond or note issued by a school district for school purposes shall file with the State Comptroller, a verified statement describing such bond or note and alleging default in the payment thereof or the interest thereon or both, it shall be the duty of the State Comptroller to immediately investigate the circumstances of the alleged default and prepare and file in his office a certificate setting forth his determinations with respect thereto and to serve a copy thereof by registered mail upon the chief fiscal officer of the school district which issued the bond or note. Such investigation by the State Comptroller shall set forth a description of all such bonds and notes of the school district found to be in default and the amount of principal and interest thereon past due.

Upon the filing of such a certificate in the office of the State Comptroller, he shall thereafter deduct and withhold from the next succeeding allotment, apportionment or payment of such State aid or assistance due to such school district such amount thereof as may be required to pay (a) the school district's contribution to the State Teachers' Retirement System, and (b) the principal of and interest on such bonds and notes of such school district then in default. In the event such State aid or assistance initially so withheld shall be insufficient to pay said amounts in full, the State Comptroller shall similarly deduct and withhold from each

succeeding allotment, apportionment or payment of such State aid or assistance due such school district such amount or amounts thereof as may be required to cure such default. Allotments, apportionments and payments of such State aid so deducted or withheld by the State Comptroller for the payment of principal and interest on the bonds and notes shall be forwarded promptly to the paying agent or agents for the bonds and notes in default of such school district for the sole purpose of the payment of defaulted principal of and interest on such bonds or notes. If any such successive allotments, apportionments or payment of such State aid so deducted or withheld shall be less than the amount of all principal and interest on the bonds and notes in default with respect to which the same was so deducted or withheld, then the State Comptroller shall promptly forward to each paying agent an amount in the proportion that the amount of such bonds and notes in default payable to such paying agent bears to the total amount of the principal and interest then in default on such bonds and notes of such school district. The State Comptroller shall promptly notify the chief fiscal officer of such school district of any payment or payments made to any paying agent or agents of defaulted bonds or notes pursuant to said section SFL.

Under current law, provision is made for contract creditors (including the Noteholders) of the District to enforce payments upon such contracts, if necessary, through court action, although the present statute limits interest on the amount adjudged due to creditors to nine per centum per annum from the date due to the date of payment. As a general rule, property and funds of a municipal corporation servicing 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 current funds or the proceeds of a tax levy.

Remedies for enforcement of payment are not expressly included in the District's contract with holders of its bonds and notes, although any permanent repeal by statute or constitutional amendment of a Noteholders remedial right to judicial enforcement of the contract should, in the opinion of Bond Counsel, be held unconstitutional.

In recent times, certain events and legislation affecting remedies on default have resulted in litigation. While courts of final jurisdiction have upheld and sustained the rights of bondholders, such courts might hold that future events including financial crises as they may occur in the State and in municipalities of the State require the exercise by the State of its emergency and police powers to assure the continuation of essential public services.

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 such indebtedness." This provision does not apply to bond anticipation notes, revenue or tax anticipation notes.

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

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

Short-Term Note Indebtedness

The District does not currently have outstanding bond anticipation notes.

Trend of Capital Indebtedness

The following table sets forth the amount of direct capital indebtedness outstanding for each of the last five fiscal years as of June 30 of each respective year, excluding refunded debt.

TABLE 9
Direct Capital Indebtedness Outstanding
(For Fiscal Year Ending June 30:)

| | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> |
|--------|---------------------|---------------------|---------------------|---------------------|---------------------|
| Bonds: | \$5,140,000 | \$3,725,000 | \$2,285,000 | \$18,545,000 | \$17,315,000 |
| BANs: | <u>12,000,000</u> | <u>19,150,000</u> | <u>18,525,000</u> | <u>0</u> | <u>0</u> |
| Total: | <u>\$17,140,000</u> | <u>\$22,875,000</u> | <u>\$20,810,000</u> | <u>\$18,545,000</u> | <u>\$17,315,000</u> |

Source: Audited Financial Statements of the District.

Overlapping and Underlying Debt

In addition to the District, other political subdivisions have the power to issue bonds and to levy taxes or cause taxes to be levied on taxable real property in the District. The real property taxpayers of the District are responsible for a proportionate share of outstanding debt obligations of these subdivisions. Such taxpayers' share of overlapping and underlying debt is based on the amount of the District's equalized property values taken as a percentage of each separate unit's total values. The table on the following page presents the amount of overlapping and underlying debt and the District's share of this debt. Authorized but unissued debt has not been included.

TABLE 10
Statement of Direct and Overlapping Indebtedness

| <u>Issuer</u> | <u>Net Debt Outstanding</u> | <u>As of</u> | <u>District Share</u> | <u>Amount Applicable To District</u> |
|---------------------------------|-----------------------------|--------------|-----------------------|--------------------------------------|
| Counties of: | | | | |
| Tioga | \$ 7,560,000 | 06/29/21 | 8.45% | \$638,820 |
| Tompkins | 56,185,000 | 06/29/21 | 0.35% | 196,648 |
| Towns of: | | | | |
| Candor | 0 | 12/31/19 | 80.45% | 0 |
| Spencer | 210,000 | 12/31/19 | 2.10% | 4,410 |
| Tioga | 0 | 12/31/19 | 2.05% | 0 |
| Caroline | 0 | 12/31/19 | 10.44% | 0 |
| Danby | 374,933 | 12/31/19 | 0.26% | 975 |
| Village of: | | | | |
| Candor | 0 | 05/31/20 | 100.00% | <u>0</u> |
| Total Net Overlapping Debt | | | | 840,852 |
| Total Net Direct Debt | | | | <u>16,040,000</u> |
| Net Direct and Overlapping Debt | | | | <u>\$16,880,852</u> |

Source: NYS Comptroller's Office and Official Statements.

Debt Ratios

The following table presents certain debt ratios relating to the District's direct and overlapping indebtedness.

TABLE 11
Debt Ratios

| | <u>Amount</u> | <u>Debt Per Capita</u> ⁽¹⁾ | <u>Debt to Full Value</u> ⁽²⁾ |
|---------------------------------|---------------|---------------------------------------|--|
| Net Direct Debt | \$16,040,000 | \$2,890 | 5.91% |
| Net Direct and Overlapping Debt | \$16,880,852 | \$3,042 | 6.22% |

⁽¹⁾ The population of the District is currently estimated by District Officials to be 5,550.

⁽²⁾ The District's full value of taxable real property for 2021 is \$271,241,840

Authorized and Unissued Indebtedness

The District has no outstanding but unauthorized indebtedness.

Other Obligations

On December 1, 2017, the District entered into a \$2,273,300 energy performance contract for a solar array project. The District makes principal and interest payments on April and October 1. As of June 30, 2020, the District has \$2,049,116 of principal outstanding.

Debt Service Schedule

The following table shows the debt service requirements to maturity on the District's outstanding bonded indebtedness, as of August 26, 2021.

TABLE 12
Bond Principal and Interest Maturity Table

| <u>FYE</u> | | | |
|---------------------|---------------------|--------------------|---------------------|
| <u>6/30:</u> | Principal | Interest | Debt Service |
| 2022 | 1,195,000 | 304,322 | 1,499,322 |
| 2023 | 1,210,000 | 271,797 | 1,481,797 |
| 2024 | 1,255,000 | 238,622 | 1,493,622 |
| 2025 | 1,355,000 | 203,872 | 1,558,872 |
| 2026 | 1,090,000 | 166,078 | 1,256,078 |
| 2027 | 1,115,000 | 138,828 | 1,253,828 |
| 2028 | 1,150,000 | 127,678 | 1,277,678 |
| 2029 | 1,180,000 | 116,178 | 1,296,178 |
| 2030 | 1,215,000 | 98,478 | 1,313,478 |
| 2031 | 1,255,000 | 80,253 | 1,335,253 |
| 2032 | 1,200,000 | 61,428 | 1,261,428 |
| 2033 | 1,140,000 | 43,428 | 1,183,428 |
| 2034 | 635,000 | 26,328 | 661,328 |
| 2035 | 80,000 | 16,803 | 96,803 |
| 2036 | 80,000 | 15,603 | 95,603 |
| 2037 | 85,000 | 14,403 | 99,403 |
| 2038 | 90,000 | 13,075 | 103,075 |
| 2039 | 95,000 | 11,669 | 106,669 |
| 2040 | 95,000 | 10,125 | 105,125 |
| 2041 | 100,000 | 8,581 | 108,581 |
| 2042 | 105,000 | 6,956 | 111,956 |
| 2043 | 105,000 | 5,250 | 110,250 |
| 2044 | 105,000 | 3,544 | 108,544 |
| 2045 | 105,000 | 1,772 | 106,772 |
| | \$16,040,000 | \$1,985,071 | \$18,025,071 |

⁽¹⁾ Columns may be off slightly due to rounding.

ECONOMIC AND DEMOGRAPHIC DATA

Population

The District estimates its population to be approximately 5,550. The following table presents population trends for the Town of Candor (the “Town”), Counties and State, based upon recent census data. Data provided in the following table is not necessarily representative of the District.

Lease Obligations

On October 30, 2017 the District issued an Energy Performance Contract in the amount of \$2,273,300 to finance the installation of solar panels. The District will make semi-annual payments of \$101,055 beginning on October 1, 2018 and ending on October 1, 2032.

TABLE 13
Population Trend

| | <u>2000</u> | <u>2010</u> | Percentage Change <u>2000/2010</u> |
|------------------------|-------------|-------------|--|
| Town | 5,317 | 4,690 | (13.4%) |
| Tioga County | 51,784 | 50,064 | (3.4%) |
| Tompkins County | 96,501 | 101,779 | 5.5% |
| State | 18,976,457 | 19,378,102 | 2.1% |

Source: US Census Bureau

Income

The following table presents median per capita income for the Town, County and State. Data provided in the following table is not necessarily representative of the District.

TABLE 14
Median per Capita Income

| | <u>2000</u> | <u>2010</u> |
|------------------------|-------------|-------------|
| Town of Candor | 16,967 | 23,537 |
| Tioga County | 18,673 | 25,719 |
| Tompkins County | 19,659 | 26,199 |
| State | 23,389 | 31,796 |

Source: U.S. Census Bureau

Employment and Unemployment

Employment and unemployment data are not compiled for the District or the Town. The following tables provide information concerning employment and unemployment in the County and State. Data provided in the following tables is not necessarily representative of the District.

TABLE 15
Civilian Labor Force
(Thousands)

| | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> |
|------------------------|-------------|-------------|-------------|-------------|-------------|
| Tioga County | 23.0 | 22.7 | 22.8 | 22.6 | 22.1 |
| Tompkins County | 50.4 | 49.9 | 50.0 | 49.1 | 47.9 |
| State | 9,527.0 | 9,549.0 | 9,511.2 | 9,507.1 | 9,289.2 |

Source: New York State Department Labor, Bureau of Labor Statistics

TABLE 16
Yearly Average Unemployment Rates

| <u>Year</u> | <u>Tioga County</u> | <u>Tompkins County</u> | <u>State</u> |
|-------------|-------------------------|----------------------------|--------------|
| 2016 | 5.2% | 4.2% | 4.9% |
| 2017 | 5.1% | 4.3% | 4.6% |
| 2018 | 4.4% | 3.6% | 4.1% |
| 2019 | 4.0% | 3.5% | 3.8% |
| 2020 | 7.8% | 6.2% | 10.0% |

Source: New York State Department Labor, Bureau of Labor Statistics. Information not seasonally adjusted.

TABLE 17
Monthly Unemployment Rates

| <u>Month</u> | <u>Tioga County</u> | <u>Tompkins County</u> | <u>State</u> |
|--------------|-------------------------|----------------------------|--------------|
| July 2020 | 10.5% | 9.3% | 14.8% |
| August | 8.0% | 6.9% | 11.6% |
| September | 5.3% | 4.7% | 9.9% |
| October | 5.1% | 4.4% | 8.3% |
| November | 5.2% | 4.6% | 8.3% |
| December | 5.7% | 4.4% | 8.5% |
| January 2021 | 6.3% | 5.3% | 9.4% |
| February | 6.8% | 5.4% | 9.7% |
| March | 6.1% | 4.7% | 8.4% |
| April | 4.7% | 4.1% | 7.7% |
| May | 4.3% | 3.7% | 7.0% |
| June | 4.7% | 4.3% | 7.3% |

Note: Unemployment has drastically increased since mid-March due to the COVID-19 global pandemic. See “COVID-19” herein.

LITIGATION

The District is subject to a number of lawsuits in the ordinary conduct of its affairs. The District does not believe, however, that such suits, individually or in the aggregate, are likely to have a material adverse effect on the financial condition of the District.

There is no action, suit, proceedings or investigation, at law or in equity, before or by any court, public board or body pending or, to the best knowledge of the District, threatened against or affecting the District to restrain or enjoin the issuance, sale or delivery of the Notes or the levy and collection of taxes or assessments to pay same, or in any way contesting or affecting the validity of the Bonds or any proceedings or authority of the District taken with respect to the authorization, issuance or sale of the Bonds or contesting the corporate existence or boundaries of the District.

END OF APPENDIX A

APPENDIX B

**SUMMARY OF FINANCIAL
STATEMENTS AND BUDGETS**

CANDOR CENTRAL SCHOOL DISTRICT
General Fund
Balance Sheets
Fiscal Year Ended June 30:

| | <u>2019</u> | <u>2020</u> |
|--|-------------------------------|-------------------------------|
| <u>Assets:</u> | | |
| Cash | | |
| Unrestricted | \$578,332 | \$0 |
| Restricted | 2,662,099 | 2,201,267 |
| Receivables | | |
| Due from other funds | 550,904 | 623,465 |
| State and Federal Aid | 254,616 | 283,649 |
| Due from other governments | 375,832 | 290,871 |
| Other Receivables | 69,741 | 409,468 |
| Prepaid items | <u>0</u> | <u>54,820</u> |
| Total Assets | <u><u>\$4,491,524</u></u> | <u><u>\$3,863,540</u></u> |
| <u>Liabilities and Fund Balance:</u> | | |
| Accounts Payable | \$0 | \$10,086 |
| Due to Other Funds | 3,448 | 110,196 |
| Due to Teachers' Retirement System | 642,466 | 591,047 |
| Due to Employees' Retirement System | 63,836 | 64,936 |
| Compensated absences payable | <u>23,632</u> | <u>27,198</u> |
| Total Liabilities | <u><u>\$733,382</u></u> | <u><u>\$803,463</u></u> |
| <u>Fund Balance:</u> | | |
| Nonspendable | \$0 | \$54,820 |
| Restricted | 2,662,099 | 2,256,266 |
| Assigned | 341,477 | 370,951 |
| Unassigned | <u>754,566</u> | <u>78,040</u> |
| Total Fund Balance | <u><u>3,758,142</u></u> | <u><u>\$2,760,077</u></u> |
| Total Liabilities and Fund Balance | <u><u>\$4,491,524</u></u> | <u><u>\$3,563,540</u></u> |

Source: Audited Financial Statements
Summary Not Audited

CANDOR CENTRAL SCHOOL DISTRICT
General Fund
Statement of Revenues, Expenditures, and Changes in Fund Balance
Fiscal Year Ended June 30:

| | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> |
|---|--------------------|--------------------|--------------------|--------------------|--------------------|
| Revenues: | | | | | |
| Real Property Taxes | \$4,320,470 | \$4,382,296 | \$4,640,393 | \$4,769,420 | \$4,905,670 |
| Other Tax Items | 997,288 | 979,678 | 926,942 | 911,310 | 885,829 |
| Charges for Services | 11,397 | 11,325 | 9,467 | 10,430 | 6,980 |
| Use of Money & Property | 4,430 | 5,628 | 7,567 | 10,891 | 27,344 |
| Sale of Prop. & Comp. for Loss | 0 | 5 | 1,204 | 141,216 | 94,096 |
| Miscellaneous | 258,099 | 433,371 | 431,053 | 396,834 | 347,911 |
| State Aid | 10,791,117 | 11,097,321 | 11,785,734 | 10,915,989 | 11,833,970 |
| Medicaid Reimbursement | 32,164 | 47,007 | 44,313 | 51,509 | 56,284 |
| Federal Sources | 0 | 143,902 | 210,782 | 3,667 | 0 |
| Total Revenues | <u>16,414,965</u> | <u>17,100,533</u> | <u>18,057,455</u> | <u>17,211,266</u> | <u>18,158,084</u> |
| Expenditures: | | | | | |
| General Support | 1,876,067 | 1,980,238 | 2,034,596 | 1,805,511 | 1,991,409 |
| Instruction | 7,753,141 | 7,752,087 | 7,850,216 | 8,264,246 | 8,892,200 |
| Pupil Transportation | 742,056 | 764,727 | 821,165 | 951,178 | 895,413 |
| Community Services | 12,539 | 30,780 | 21,956 | 5,664 | 4,937 |
| Employee Benefits | 3,726,595 | 4,148,493 | 4,114,517 | 4,711,257 | 4,506,998 |
| Debt Service | 1,718,165 | 2,238,050 | 2,624,017 | 2,214,283 | 2,391,840 |
| Total Expenditures | <u>15,828,563</u> | <u>16,914,375</u> | <u>17,466,467</u> | <u>17,952,139</u> | <u>18,682,797</u> |
| Excess (Deficiency) of Revenues Over Expenditures | 586,402 | 186,158 | 590,988 | (740,873) | (524,713) |
| Other Uses: | | | | | |
| Interfund Transfers | <u>(35,889)</u> | <u>(50,972)</u> | <u>(108,056)</u> | <u>(86,166)</u> | <u>(173,352)</u> |
| Excess of Revenues and Other Sources Over Expenditures and Other Uses | <u>550,513</u> | <u>135,186</u> | <u>482,932</u> | <u>(827,039)</u> | <u>(698,065)</u> |
| Fund Balance - Beg. of Year | <u>3,416,550</u> | <u>3,967,063</u> | <u>4,102,249</u> | <u>4,585,181</u> | <u>3,758,142</u> |
| Fund Balance - End of Year | <u>\$3,967,063</u> | <u>\$4,102,249</u> | <u>\$4,585,181</u> | <u>\$3,758,142</u> | <u>\$3,060,077</u> |

Source: Audited Financial Statements
Summary Not Audited

CANDOR CENTRAL SCHOOL DISTRICT
General Fund
Statement of Estimated Revenues and Budget Appropriations
Fiscal Year Ending June 30:

| | <u>Adopted</u> <u>Budget</u> 2020-21 | <u>Adopted</u> <u>Budget</u> 2021-22 |
|----------------------------|--|--|
| Estimated Revenues: | | |
| Real Property Tax | \$5,889,866 | \$5,963,489 |
| Miscellaneous | 300,000 | 300,000 |
| State Aid | 12,130,860 | 12,612,977 |
| Fund Balance Reserves | \$310,000 | \$0 |
| | 18,630,726 | 18,876,466 |
| Appropriated Fund Balance | 250,000 | 125,000 |
| Total Estimated Revenues: | 18,880,726 | 19,001,466 |
| Appropriations: | | |
| Administration | \$1,750,772 | \$2,051,583 |
| Program | \$13,834,590 | \$13,828,844 |
| Capital | \$3,295,364 | \$3,121,039 |
| Total Appropriations: | \$18,880,726 | \$19,001,466 |

Source: District Officials

APPENDIX C

**INDEPENDENT AUDITORS' REPORT
FOR THE FISCAL YEAR ENDED
JUNE 30, 2020**

**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/P21417730-P21101615-P21511059.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. Insero & Co, CPA, P.C. has not been requested by the District
to further review and/or update such Financial Statements or opinion in connection
with the preparation and dissemination of this Official Statement.**

Candor Central School District
 Projected Cash Flows
 FY 2021-22

| | July | August | Sept Week 1 | Sept Week 2 | Sept Week 3 | Sept Week 4 | October | November | December | January | February | March | April | May | June | Total |
|---|------------------|------------------|------------------|------------------|------------------|--------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|-------------------|
| Beginning Cash Investment | 2,393,868 | 1,100,761 | 33,950 | (182,054) | (672,054) | (837,054) | (1,123,711) | 4,480,677 | 5,254,526 | 4,735,482 | 4,665,825 | 4,366,168 | 7,220,511 | 7,273,695 | 7,644,038 | |
| Cash Receipts | | | | | | | | | | | | | | | | |
| Property Tax (inc. PILOT and STAR) | | | | | | 300,000 | 3,975,000 | 200,000 | | 870,000 | | | 618,895 | | | 5,963,895 |
| Lottery Aid (inc. VLT Lottery Grant) | | | | | | | 1,159,000 | 65,000 | 65,000 | 65,000 | 65,000 | 139,000 | | | | 1,558,000 |
| Excess Cost Aid | | 172,846 | | | | | 140,623 | | 310,000 | | | 550,000 | | | 185,000 | 1,358,469 |
| General State Aid | | | | | | | 944,332 | 425,000 | 480,000 | | 365,000 | 3,170,000 | 550,000 | 1,370,000 | 370,000 | 7,674,332 |
| Medicaid | 2,000 | 2,000 | 2,000 | | | | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 2,000 | 24,000 |
| BOCES Aid | | | | | | | | 411,000 | | | 220,000 | | | | | 901,000 |
| BOCES Prior Year Refund | | | | | | | | 300,000 | | | | | | | | 300,000 |
| Grants (State, Federal, and Local) - 20-21 Final Payments | | | | | | | 580,956 | 37,000 | | | | | | | | 617,956 |
| Grants (State, Federal, and Local) - 21-22 Initial Payments | | | | | | | 136,074 | 285,506 | 500,000 | | | 250,000 | | | | 1,171,580 |
| Interest Earnings | | | | | | | | | | | | | | | | - |
| Debt Proceeds | | | | | | | | | | | | | | | | - |
| Interfund Transfers | 285,000 | | | | | | | | | | | | | | | 285,000 |
| Other Local | | | | | | | | | | | | | | | | - |
| Total Cash Receipts | <u>287,000</u> | <u>174,846</u> | <u>2,000</u> | <u>-</u> | <u>-</u> | <u>300,000</u> | <u>6,937,985</u> | <u>1,725,506</u> | <u>1,357,000</u> | <u>937,000</u> | <u>652,000</u> | <u>4,111,000</u> | <u>1,170,895</u> | <u>1,372,000</u> | <u>827,000</u> | <u>19,854,232</u> |
| Cash Disbursements | | | | | | | | | | | | | | | | |
| Accounts Payable Warrants | 358,350 | 300,000 | 80,000 | 80,000 | 80,000 | 80,000 | 305,000 | 225,000 | 315,000 | 280,000 | 225,000 | 250,000 | 290,000 | 250,000 | 762,319 | 3,880,669 |
| ERS | | | | | | | | | 250,000 | | | | | | | |
| Payroll ACHs | 152,280 | 155,000 | - | 300,000 | - | 300,000 | 500,000 | 450,000 | 750,000 | 450,000 | 450,000 | 475,000 | 450,000 | 475,000 | 1,100,000 | 6,007,280 |
| Health Insurance | 220,000 | 250,000 | 60,000 | 60,000 | 60,000 | 60,000 | 240,000 | 240,000 | 240,000 | 240,000 | 240,000 | 240,000 | 240,000 | 240,000 | 240,000 | 2,870,000 |
| Stop Loss Insurance/ Excellus Admin Fee | 36,657 | 36,657 | - | - | - | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 36,657 | 439,884 |
| BOCES Payment | 258,000 | | | | | | | | | | | 255,000 | | | | 2,713,000 |
| Debt Service | 54,820 | | 53,004 | - | | 60,000 | 226,940 | | 284,387 | | | | 101,054 | | | 2,259,592 |
| Interfund Transfers - grants up front spending | 500,000 | 500,000 | 25,000 | 50,000 | 25,000 | 50,000 | 25,000 | | | | | | | | | 1,175,000 |
| Capital Improvement (Smart Schools) | | | | | | | | | | | | | | | | - |
| Total Cash Disbursements | <u>1,580,107</u> | <u>1,241,657</u> | <u>218,004</u> | <u>490,000</u> | <u>165,000</u> | <u>586,657</u> | <u>1,333,597</u> | <u>951,657</u> | <u>1,876,044</u> | <u>1,006,657</u> | <u>951,657</u> | <u>1,256,657</u> | <u>1,117,711</u> | <u>1,001,657</u> | <u>5,818,363</u> | <u>19,595,425</u> |
| Net Change in Cash Position | (1,293,107) | (1,066,811) | (216,004) | (490,000) | (165,000) | (286,657) | 5,604,388 | 773,849 | (519,044) | (69,657) | (299,657) | 2,854,343 | 53,184 | 370,343 | (4,991,363) | |
| Ending Cash Investment | <u>1,100,761</u> | <u>33,950</u> | <u>(182,054)</u> | <u>(672,054)</u> | <u>(837,054)</u> | <u>(1,123,711)</u> | <u>4,480,677</u> | <u>5,254,526</u> | <u>4,735,482</u> | <u>4,665,825</u> | <u>4,366,168</u> | <u>7,220,511</u> | <u>7,273,695</u> | <u>7,644,038</u> | <u>2,652,675</u> | |
| Unrestricted Cash | <u>1,100,761</u> | <u>33,950</u> | <u>(182,054)</u> | <u>(672,054)</u> | <u>(837,054)</u> | <u>(1,123,711)</u> | <u>4,480,677</u> | <u>5,254,526</u> | <u>4,735,482</u> | <u>4,665,825</u> | <u>4,366,168</u> | <u>7,220,511</u> | <u>7,273,695</u> | <u>7,644,038</u> | <u>2,652,675</u> | |

**Candor Central School District
Actual Cash Flows
2019-2020**

| | Jul-19 | Aug-19 | Sep-19 | Oct-19 | Nov-19 | Dec-19 | Jan-20 | Feb-20 | Mar-20 | Apr-20 | May-20 | Jun-20 |
|--------------------------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Beginning Cash Investment | 3,440,451 | 2,878,673 | 2,057,485 | 4,351,452 | 5,142,897 | 6,404,907 | 4,815,067 | 4,527,659 | 4,504,367 | 7,310,771 | 7,470,286 | 7,527,197 |
| Cash Receipts | | | | | | | | | | | | |
| Property Tax (inc. PILOT and STAR) | | | 2,571,574 | 1,840,910 | | | 872,081 | | | 506,288 | | |
| Lottery Aid (inc. VLT Lottery Grant) | | | 1,127,061 | 70,381 | 70,381 | 70,381 | 70,381 | 70,381 | 70,381 | 42,831 | | |
| Excess Cost Aid | | 163,824 | 17,395 | | | | 169,044 | | 801,774 | | | |
| General State Aid | 85,019 | | | | 1,271,551 | | 266,950 | 692,123 | 3,033,287 | 562,424 | 1,300,810 | 818,108 |
| Categorical State Aid | | | | | | | | | 73,169 | | | |
| Cafeteria Sales & Reimbursement | | | | | | | | | | | | |
| Medicaid | 8,113 | 3,018 | 2,096 | 4,084 | 18,822 | 6,108 | 6,463 | 25,279 | 7,921 | 8,144 | 1,265 | 2,088 |
| County Sales Tax | | | | | | | | | | | | |
| Tuition / Tuition Reimbursement | | | | | | | | | | | | |
| BOCES Aid | | | | | 688,391 | | | 228,847 | | | | 271,613 |
| Grants (State, Federal, and Local) | | | | | | | | | | | | |
| Interest Earnings | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 | 2,278 |
| Debt Proceeds | | | | | | | | | | | | |
| Interfund Transfers | | | | | | | | | | | | |
| Other Local | | | | | 34,930 | | | | | 94,070 | | |
| Total Cash Receipts | <u>95,410</u> | <u>169,120</u> | <u>3,720,404</u> | <u>1,917,653</u> | <u>2,086,353</u> | <u>78,767</u> | <u>1,387,197</u> | <u>1,018,908</u> | <u>3,988,810</u> | <u>1,216,035</u> | <u>1,304,353</u> | <u>1,094,087</u> |
| Cash Disbursements | | | | | | | | | | | | |
| Accounts Payable Warrants | 657,188 | 990,307 | 1,426,438 | 1,126,208 | 824,343 | 1,330,608 | 1,674,605 | 1,042,199 | 1,182,407 | 1,056,520 | 1,247,442 | 4,852,947 |
| Payroll and Payroll withholdings | | | | | | | | | | | | |
| Debt Service | | | | | | 337,999 | | | | | | 1,567,999 |
| Interfund Transfers | | | | | | | | | | | | |
| Total Cash Disbursements | <u>657,188</u> | <u>990,307</u> | <u>1,426,438</u> | <u>1,126,208</u> | <u>824,343</u> | <u>1,668,607</u> | <u>1,674,605</u> | <u>1,042,199</u> | <u>1,182,407</u> | <u>1,056,520</u> | <u>1,247,442</u> | <u>6,420,946</u> |
| Net Change in Cash Position | (561,778) | (821,187) | 2,293,967 | 791,445 | 1,262,010 | (1,589,840) | (287,408) | (23,291) | 2,806,403 | 159,515 | 56,911 | (5,326,859) |
| Ending Cash Investment | <u>2,878,673</u> | <u>2,057,485</u> | <u>4,351,452</u> | <u>5,142,897</u> | <u>6,404,907</u> | <u>4,815,067</u> | <u>4,527,659</u> | <u>4,504,367</u> | <u>7,310,771</u> | <u>7,470,286</u> | <u>7,527,197</u> | <u>2,200,338</u> |
| Restricted Cash | | | | | | | | | | | | |
| Debt Service | - | - | - | - | - | - | - | - | - | - | - | - |
| Capital Reserve | - | - | - | - | - | - | - | - | - | - | - | - |
| Unrestricted Cash | <u>2,878,673</u> | <u>2,057,485</u> | <u>4,351,452</u> | <u>5,142,897</u> | <u>6,404,907</u> | <u>4,815,067</u> | <u>4,527,659</u> | <u>4,504,367</u> | <u>7,310,771</u> | <u>7,470,286</u> | <u>7,527,197</u> | <u>2,200,338</u> |