PRELIMINARY OFFICIAL STATEMENT DATED AUGUST 30, 2021

NEW AND RENEWAL ISSUES **BOND ANTICIPATION NOTES**

In the opinion of The Law Offices of Jeffrey E. Storch, Bond Counsel, under existing law and assuming continuing compliance with certain covenants and the accuracy of certain representations, (i) interest on the Notes is excluded from gross income for federal income tax purposes and is not an item of tax preference for purposes of the federal alternative minimum tax and (ii) interest on the Notes is exempt from personal income taxes imposed by the State of New York and political subdivisions thereof, including The City of New York and the City of Yonkers. For a more complete discussion of the tax aspects, see "Tax Matters" herein.

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

VILLAGE OF PELHAM
WESTCHESTER COUNTY, NEW YORK
$5,103,287
BOND ANTICIPATION NOTES - 2021
(the "Notes")

Date of Issue: September 16, 2021 **Maturity Date: September 16, 2022**

The Notes are general obligations of the Village of Pelham, Westchester County, New York (the "Village"), and will contain a pledge of the faith and credit of the Village for the payment of the principal thereof and interest thereon and the Notes are payable from ad valorem taxes which may be levied upon all the taxable real property within the Village, subject to certain statutory limitations imposed by Chapter 97 of the New York Laws of 2011. **See "Tax Levy Limit Law," herein.**

The Notes will not be subject to redemption prior to maturity.

At the option of the purchaser(s), the Notes will be issued in (i) registered form registered in the name of the successful bidder(s) or (ii) registered book-entry form registered to Cede & Co., as the partnership nominee for The Depository Trust Company, New York, New York ("DTC").

If the Notes are issued registered in the name of the successful bidder(s), a single note certificate will be issued for those Notes bearing the same rate of interest in the aggregate principal amount awarded to such purchaser(s) at such interest rate. Principal of and interest on such Notes will be payable in Federal Funds by the Village to the registered owner(s).

If the Notes are issued in book-entry-only form, such Notes will be delivered to DTC, which will act as securities depository for the Notes. Beneficial owners will not receive certificates representing their interest in the Notes. Individual purchases may be made in denominations of $5,000 or integral multiples thereof, except for an odd denomination which is or includes 8,287. A single Note certificate will be issued for those Notes bearing the same rate of interest and CUSIP number in the aggregate principal amount awarded to such purchaser(s) at such interest rate. Principal of and interest on said Notes will be made in Federal Funds by the Village to Cede & Co., as nominee for DTC, which will in turn remit such principal and interest to its participants for subsequent disbursement to the beneficial owners of the as described herein. Transfer of principal and interest payments to beneficial owners by participants of DTC will be the responsibility of such participants and other nominees of beneficial owners. The Village will not be responsible or liable for payments by DTC to its participants or by DTC participants to beneficial owners or for maintaining, supervising or reviewing the records maintained by DTC, its participants or persons acting through such participants. (See "Book-Entry-Only System" herein.).

The Notes are offered subject to the final approving opinion of The Law Offices of Jeffrey E. Storch, New York, New York, Bond Counsel, and certain other conditions. Capital Markets Advisors, LLC has served as Municipal Advisor to the Village in connection with the issuance of the Notes. It is expected that delivery of the Notes in book-entry form through the offices of DTC in New York, New York or as otherwise agreed upon with the purchaser(s) will be made on or about September 16, 2021.

THIS OFFICIAL STATEMENT IS IN A FORM DEEMED FINAL BY THE VILLAGE FOR PURPOSES OF SECURITIES AND EXCHANGE COMMISSION RULE 15C2-12, AS AMENDED (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(S) AS MORE FULLY DESCRIBED IN THE NOTICE OF SALE WITH RESPECT TO THE OBLIGATIONS HEREIN DESCRIBED. THE VILLAGE WILL COVENANT IN A CONTINUING DISCLOSURE AGREEMENT TO PROVIDE CONTINUING DISCLOSURE WITH RESPECT TO THE NOTES IN ACCORDANCE WITH THE RULE. SEE "COVENANT TO MAKE CONTINUING FINANCIAL DISCLOSURE" HEREIN.

DATED: September __, 2021

VILLAGE OF PELHAM
WESTCHESTER COUNTY, NEW YORK

Chance Mullen
Mayor

Michael Carpenter .... Trustee / Deputy Mayor

Lisa Hill-Ries .... Trustee

Hanan Kamal Eldahry .... Trustee

Kimberly McGreal .... Trustee

Russell Solomon .... Trustee

Ariel Spira-Cohen .... Trustee

Christopher Scelza .... Village Administrator/Treasurer

Kieya Glaze .... Deputy Village Treasurer

Terri Rouke .... Village Clerk

Cara Farrell .... Deputy Village Clerk

Edward Smith, Esq. .... Village Attorney

INDEPENDENT AUDITOR

PKF O'Connor Davies, LLP
Harrison, New York

BOND COUNSEL

The Law Offices of Jeffrey E. Storch
New York, New York

MUNICIPAL ADVISOR

CMA
CapitalMarketsAdvisors,LLC

Capital Markets Advisors, LLC
Long Island * Southern Tier * Western New York
(516) 274-4504

No dealer, broker, salesperson or other person has been authorized by the Village of Pelham to give any information or to make any representations not contained in this Official Statement and, if given or made, such other information or representations must not be relied upon as having been authorized. This Official Statement does not constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of the Notes by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale. The information, estimates and expressions of opinion made 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 Village of Pelham since the date hereof.

TABLE OF CONTENTS

APPENDIX A

OFFICIAL STATEMENT

VILLAGE OF PELHAM
WESTCHESTER COUNTY, NEW YORK

relating to

$5,103,287
BOND ANTICIPATION NOTES, SERIES - 2021
(the "Notes")

This Official Statement, which includes the cover page and appendices attached hereto, presents certain information relating to the Village of Pelham, Westchester County, in the State of New York (the "Village", "County", and "State", respectively). It has been prepared by the Village in connection with the sale and delivery of $5,103,287 Bond Anticipation Notes - 2021 (the "Notes").

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

THE NOTES

Description

The Notes will be dated and will mature as reflected on the cover page hereof.

The Notes will not be subject to redemption prior to maturity. Interest will be calculated on a 30-day month and 360-day year basis, payable at maturity.

The Notes will be issued in registered form, either registered in the name of the successful bidder(s) or registered to Cede & Co, as the partnership nominee for DTC. The Village will act as Paying Agent for the Notes. The Village contact information is as follows: Christopher Scelza, Village Administrator/Treasurer, 195 Sparks Avenue, Pelham, New York 10803, (914) 738-6270, e-mail: chris.scelza@pelhamgov.com.

Authority for and Purpose of the Notes

Authorization. The Notes are issued pursuant to the State Constitution and statutes of the State, including among others, the Village Law and the Local Finance Law (Chapter 33-a of the Consolidated Laws of the State) and in the bond resolutions adopted by the Board of Trustees of the Village as set forth in the table on the following page.

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

Purpose. A $2,361,000 portion of the proceeds from the sale of the Notes, together with $263,423 in available funds, will be used to redeem the Village's $3,005,710 in outstanding bond anticipation notes at maturity on September 17, 2021. A $2,361,000 portion of the proceeds from the sale of the Notes will be used to provide original and additional financing as described in the table below.

Original Issue Date	Purpose	Amount Outstanding	Paydown	New Money	Amount of the Notes
10-10-17	Engine 4 Replacement	$ 606,300	$ 23,500	$ 0	$ 582,800
10-10-17	Street Resurfacing	447,700	28,100	0	419,600
10-10-17	Sidewalk Repairs	203,500	25,000	0	178,500
10-10-17	Patrol Vehicles	68,600	34,300	0	34,300
10-10-17	LED Street Lighting	195,723	13,932	0	181,791
10-10-17	Cascade Fill Station for SCBAs	24,000	12,000	0	12,000
10-10-17	Traffic Safety Equipment	16,000	8,000	0	8,000
10-10-17	Pick-Up Truck w/ Plow	16,000	8,000	0	8,000
10-10-17	Tractor w/ Plow & Grass Mower	13,200	6,600	0	6,600
10-10-17	Generator - Police Department	8,000	4,000	0	4,000
09-19-19	Firefighting Apparatus	30,641	7,096	0	23,545
09-19-19	Fingerprinting System	34,418	7,970	0	26,448
09-19-19	Communications System Install	141,515	12,766	0	128,749
09-19-19	Patrol Cars	128,440	29,743	0	98,697
09-19-19	Street Resurfacing	586,424	29,656	0	556,768
09-19-19	Dump Truck w/ Front Plow	156,380	7,908	0	148,472
09-19-19	Young Avenue Field	48,869	2,471	0	46,398
09-19-19	Sanitary Sewer Evaluation Study	280,000	2,381	0	277,619
09-16-21	Radio Equipment	0	0	73,000	73,000
09-16-21	Ford Interceptor AWD (FD)	0	0	53,000	53,000
09-16-21	Radio Systems Updates	0	0	42,000	42,000
09-16-21	Ford Interceptor AWD (PD)	0	0	53,000	53,000
09-16-21	Garbage Truck (4)	0	0	1,375,000	1,375,000
09-16-21	Young Avenue Field Remediation	0	0	150,000	150,000
09-16-21	Dump Truck	0	0	65,000	65,000
09-16-21	Toters for Garbage Collection	0	0	400,000	400,000
09-16-21	Wolfs Lane Park Retaining Wall	0	0	150,000	150,000
		$3,005,710	$263,423	$2,361,000	$5,103,287

Book-Entry-Only System

If book-entry-only format is chosen, the Depository Trust Company ("DTC"), New York, New York, will act as securities depository for the Notes if issued as book-entry-only Notes. Such 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 note certificate will be issued for each note bearing the same rate of interest and CUSIP and deposited with DTC.

DTC is a limited-purpose trust company organized under the New York Banking Law, a "banking organization" within the meaning of the New York Banking Law, a member of the Federal Reserve System, a "clearing corporation" within the meaning of the New York Uniform Commercial Code, and a "clearing agency" registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC's participants ("Direct Participants") deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants' accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations.

DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation ("DTCC"). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies. DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly ("Indirect Participants"). The DTC Rules applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at www.dtcc.com and www.dtc.org.

Purchases of the 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 note ("Beneficial Owner") is in turn to be recorded on the Direct and Indirect Participants' records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the 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 notes 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 Money Market Instruments (MMI) Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the Village 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 Village, 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 Village, 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 Village, 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 Village. Under such circumstances, in the event that a successor depository is not obtained, note certificates are required to be printed and delivered.

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

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

Source: The Depository Trust Company

THE INFORMATION CONTAINED IN THE ABOVE SECTION CONCERNING DTC AND DTC'S BOOK-ENTRY SYSTEM HAS BEEN OBTAINED FROM SAMPLE OFFERING DOCUMENT LANGUAGE SUPPLIED BY DTC, BUT THE VILLAGE TAKES NO RESPONSIBILITY FOR THE ACCURACY THEREOF. IN ADDITION, THE VILLAGE WILL NOT HAVE ANY RESPONSIBILITY OR OBLIGATION TO PARTICIPANTS, TO INDIRECT PARTICIPANTS OR TO ANY BENEFICIAL OWNER WITH RESPECT TO: (I) THE ACCURACY OF ANY RECORDS MAINTAINED BY DTC, ANY PARTICIPANT OR ANY INDIRECT PARTICIPANT; (II) THE PAYMENTS BY DTC OR ANY PARTICIPANT OR ANY INDIRECT PARTICIPANT OF ANY AMOUNT WITH RESPECT TO THE PRINCIPAL OF, OR PREMIUM, IF ANY, OR INTEREST ON THE NOTES OR (III) ANY NOTICE WHICH IS PERMITTED OR REQUIRED TO BE GIVEN TO NOTEOWNERS.

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

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

NATURE OF OBLIGATION

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

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

The Notes will be general obligations of the Village and will contain a pledge of the faith and credit of the Village for the payment of the principal thereof and the interest thereon as required by the Constitution and laws of the State. For the payment of such principal and interest, the Village has power and statutory authorization to levy ad valorem taxes on all real property within the Village subject to such taxation by the Village, subject to certain statutory limitations imposed by Chapter 97 of the New York Laws of 2011. See "Tax Levy Limit Law," herein.

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

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

The Constitutionally-mandated general obligation pledge of municipalities and school districts in New York State has been interpreted by the Court of Appeals, the State's highest court, in 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 this is what the courts have held they mean…So, too, although the Legislature is given the duty to restrict municipalities in order to prevent abuses in taxation, assessment, and in contracting of indebtedness, it may not constrict the City's power to levy taxes on real estate for the payment of interest on or principal of indebtedness previously contracted...While phrased in permissive language, these provisions, when read together with the requirement of the pledge and faith and credit, express a constitutional imperative: debt obligations must be paid, even if tax limits be exceeded".

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

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

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

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

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

Tax Levy Limit Law

On June 24, 2011, the Tax Levy Limit Law was signed into law by the Governor of the State. The Tax Levy Limit Law applies to all local governments, including school districts (with the exception of New York City, Yonkers, Syracuse, Rochester and Buffalo). It also applies to independent special districts and to town and county improvement districts as part of their parent municipalities’ tax levies.

The Tax Levy Limit Law restricts, among other things, the amount of real property taxes (including assessments of certain special improvement districts) that may be levied by or on behalf of a municipality in a particular year, beginning with fiscal years commencing on or after January 1, 2012. Pursuant to the Tax Levy Limit Law, the tax levy of a municipality cannot increase by more than the lesser of (i) two percent (2%) or (ii) the annual increase in the consumer price index ("CPI"), over the amount of the prior year’s tax levy. Certain adjustments would be permitted for taxable real property full valuation increases or changes in physical or quantity growth in the real property base as defined in Section 1220 of the Real Property Tax Law. A municipality may exceed the tax levy limitation for the coming fiscal year only if the governing body of such municipality first enacts, by at least a sixty percent vote of the total voting strength of the board, a local law (resolution in the case of fire districts and certain special districts) to override such limitation for such coming fiscal year only. There are permissible exceptions to the tax levy limitation provided in the Tax Levy Limit Law, including expenditures made on account of certain tort settlements and certain increases in the average actuarial contribution rates of the New York State and Local Employees’ Retirement System, the Police and Fire Retirement System, and the Teachers’ Retirement System. (See “Employment Benefit Plans” herein). Municipalities are also permitted to carry forward a certain portion of their unused levy limitation from a prior year. Each municipality, prior to adoption of each fiscal year budget, must submit for review to the State Comptroller any information that is necessary in the calculation of its tax levy for each fiscal year.

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

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

It is likely that the Tax Levy Limit 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 or political subdivisions, the outcome of any such legal challenge cannot be predicted.

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SPECIAL PROVISIONS AFFECTING REMEDIES UPON DEFAULT

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

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

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

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

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

The rights of the owners of Notes to receive interest and principal from the Village could be adversely affected by the restructuring of the Village's debt under Chapter 9 of the Federal Bankruptcy Code. No assurance can be given that any priority of holders of debt obligations issued by the Village (including the Notes) to payment from monies retained in any debt service fund or from other cash resources would be recognized if a petition were filed by or on behalf of the Village under the Federal Bankruptcy Code or pursuant to other subsequently enacted laws relating to creditors' rights; such monies might, under such circumstances, be paid to satisfy the claims of all creditors generally.

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

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

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

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

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

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

A proposed plan can be modified prior to court approval or disapproval. After approval, modification is not permissible without court order after a hearing. If not approved, the proposed plan must be amended within ten days or else the stay is vacated and claims, including debt service due or overdue, must be paid. It is at the discretion of the court to permit additional filings of amended plans and continuation of any stay during such time. A stay may be vacated or modified by the court upon motion of any creditor, if the court finds after a hearing that the municipality has failed to comply with a material provision of an accepted repayment plan or that due to a "material change in circumstances," the repayment plan is no longer in compliance with statutory requirements.

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

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

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

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

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

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

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

Although from time to time there have been proposals for the creation of a statewide financial control board with broad authority over local governments in the State, the FRB does not have emergency financial control board powers to intervene, unlike public benefit corporations established by special acts as described above.

Several municipalities in the State are presently working with the FRB. The Village has not applied to the FRB and does not reasonably expect to do so in the foreseeable future. School districts and fire districts are not eligible for FRB assistance.

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

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

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

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

Cybersecurity

The Village, like many other public and private entities, relies on technology to conduct its operations. As a recipient and provider of personal, private, or sensitive information, the Village faces multiple cyber threats including, but not limited to, hacking, viruses, malware and other attacks on computer and other sensitive digital networks and systems. To mitigate the risk of business operations impact and/or damage from cyber incidents or cyber-attacks, the Village invests in various forms of cybersecurity and operational controls; however, no assurances can be given that such security and operational control measures will be completely successful to guard against cyber threats and attacks. The results of any such attack could impact business operations and/or damage Village digital networks and systems and the costs of remedying any such damage could be substantial.

MARKET FACTORS

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

There can be no assurance that the State appropriation for State aid to school districts or municipalities will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the Village can be paid only if the State has such monies available therefor. The availability of such monies and the timeliness of such payment may also be affected by a delay in the adoption of the State budget or the State's financial condition due to the COVID-19 outbreak and other circumstances, including fiscal stress. In any event, State aid appropriated and apportioned to the Village can be paid only if the State has such monies available therefor. (See "State Aid" and "Sales Tax" herein regarding COVID-19 impact on budgeted sales tax revenues).

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

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

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

The enactment of Chapter 97 of the New York Laws of 2011 on June 24, 2011, which imposes a tax levy limitation upon municipalities, school districts, including the Village, and fire districts in the State could have an impact upon operations of the Village and as a result, the market price for the Notes. (See “Tax Levy Limit Law,” herein.)

Impacts of COVID-19

The Village has incurred certain expenses associated with the COVID-19 pandemic, including but not limited to, costs related to cleaning equipment, cleaning supplies and personal protective equipment. The Village has paid such costs from budgetary appropriations and/or available funds. The Village’s State Aid for the 2020 fiscal year was not reduced and the Village does not expect a reduction in State aid during the 2021 fiscal year. The Village has also experience revenue losses from interest earnings, permit fees, fines and various parking revenues due to the COVID-19 pandemic. The Village does not believe that the increased costs or the potential reductions in State aid or other revenues described above will have a material adverse impact on the finances of the Village.

On March 11, 2021, President Biden signed into law the American Rescue Plan Act of 2021. Included in this bill was $350 billion in direct aid to state and local governments. Payments to local governments will be made in two tranches, the first half 60 days after enactment and the second half one year later. The funding is available through, and must be spent by, the end of calendar year 2024.

Specifically, eligible uses of the aid include: (i) revenue replacement for the provision of government services to the extent the reduction in revenue is due to the COVID-19 public health emergency relative to revenues collected in the most recent fiscal year prior to the emergency; (ii) premium pay for essential workers; (iii) assistance to small businesses, households, and hard-hit industries, and economic recovery; and (iv) investments in water, sewer and broadband infrastructure. The bill also contains two restrictions on eligible uses: (i) funds cannot be used to directly or indirectly offset tax reductions or delay a tax increase; and (ii) funds cannot be deposited into any pension fund.

Currently, the Village is awaiting additional guidance from the Federal Government on how to utilize these funds. Once this guidance is received, the Village Board of Trustees will be able to determine how these funds will be utilized.

THE STATE COMPTROLLER’S FISCAL STRESS MONITORING SYSTEM AND COMPLIANCE REVIEWS

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

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

The 2020 applicable report of the State Comptroller designates the Village as "No Designation."

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

The financial affairs of the Village are subject to periodic compliance reviews by OSC to ascertain whether the Village has complied with the requirements of various State and federal statutes. The last audit conducted by OSC was released on April 7, 2017. The purpose of the State's audit to determine whether Village officials adequately safeguarded sensitive data stored on Village computer systems for the period June 1, 2015 through August 11, 2016. The complete report can be obtained from OSC's official website (http://www.osc.state.ny.us/index.htm). Reference to this website implies no warrant of accuracy of information therein.

LITIGATION

Claims and Litigation. The Village from time to time receives notices of claim and is party to litigation.

In the opinion of the Village Attorney (based in part on information provided by the Village), apart from and not including matters handled by insurance defense counsel, the Village is not a party to any pending litigation which, if determined against the Village, would have an adverse material effect on the financial condition of the Village. The Village Attorney makes no representations concerning the disclosures below concerning Insurance and Tax Certiorari Claims.

Insurance. The Village purchases insurance to reduce its exposure to loss. The Village maintains general liability, automobile and comprehensive coverages with a policy limit of $1 million. An employment protection liability policy has a coverage of $10 million. An umbrella policy provides additional liability coverage of $15 million. The Village also purchases conventional workers' compensation and medical insurance coverage. Settled claims resulting from these risks have not exceeded commercial insurance coverage in any of the past three fiscal years.

Tax Certiorari Claims. There are also pending against the Village various proceedings brought pursuant to Article 7 of the Real Property Tax Law, to review and reduce real estate assessments and obtain a refund for alleged overpayments of real estate taxes. The results of the pending tax certiorari proceedings cannot be determined at this time, however, assessment reductions historically have been significantly smaller than the amounts claimed. The Villages' tax base has remained relatively constant with new assessments offsetting reductions due to certiorari settlements. The Village's tax base has remained relatively constant due to the Annual Reassessment Program, which allows for assessments to be changed on an annual basis. This program has helped to minimize certiorari settlements. For fiscal year 2019-20, the Village paid $1,463 in tax certiorari refunds.

TAX MATTERS

In the opinion of The Law Offices of Jeffrey E. Storch, Bond Counsel, under existing law: (i) interest on the Notes is excluded from gross income for federal income tax purposes under Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and is not an item of tax preference for purposes of the federal alternative minimum tax and the Notes will be "qualified tax exempt obligations" as defined in Section 265 (b)(3) of the Code; and (ii) interest on the Notes is exempt from personal income taxes imposed by the State and political subdivisions thereof, including The City of New York and the City of Yonkers. Bond Counsel will express no opinion as to any other tax consequences regarding the Notes.

The opinion on tax matters will be based on and will assume (without verifying) the accuracy of certain representations and certifications, and continuing compliance with certain covenants, of the Village to be contained in the transcript of proceedings and that are intended to evidence and assure the foregoing, including that the Notes are and will remain obligations the interest on which is excluded from gross income for federal income tax purposes. Bond Counsel will not independently verify the accuracy of the Village's certifications and representations or the continuing compliance with the Village's covenants.

The opinion of Bond Counsel is based on current legal authority and covers certain matters not directly addressed by such authority. It represents Bond Counsel's legal judgment as to exclusion of interest on the Notes from gross income for federal income tax purposes but is not a guaranty of that conclusion. The opinion is not binding on the Internal Revenue Service ("IRS") or any court. Bond Counsel expresses no opinion about (i) the effect of future changes in the Code and the applicable regulations under the Code or (ii) the interpretation and the enforcement of the Code or those regulations by the IRS.

The Code prescribes a number of qualifications and conditions for the interest on state and local government obligations to be and to remain excluded from gross income for federal income tax purposes, some of which require future or continued compliance after issuance of the obligations. Noncompliance with these requirements by the Village may cause loss of such status and result in the interest on the Notes being included in gross income for federal income tax purposes retroactively to the date of issuance of the Notes. The Village has covenanted to take the actions required of it for the interest on the Notes to be and remain excluded from gross income for federal income tax purposes, and not to take any actions that would adversely affect that exclusion. After the date of issuance of the Notes, Bond Counsel will not undertake to determine (or to so inform any person) whether any actions taken or not taken, or any events occurring or not occurring, or any other matters coming to Bond Counsel's attention, may adversely affect the exclusion from gross income for federal income tax purposes of interest on the Notes or the market prices of the Notes.

Interest on the Notes may be subject to a federal branch profits tax imposed on certain foreign corporations doing business in the United States and to a federal tax imposed on excess net passive income of certain "S corporations" (as defined in Section 1361(a)(1) of the Code). Under the Code, the exclusion of interest from gross income for federal income tax purposes may have certain adverse federal income tax consequences on items of income, deduction or credit for certain taxpayers, including financial institutions, certain insurance companies, recipients of Social Security and Railroad Retirement benefits, those that are deemed to incur or continue indebtedness to acquire or carry tax-exempt obligations, and individuals otherwise eligible for the earned income tax credit. The applicability and extent of these or other tax consequences will depend upon the particular tax status or other tax items of the owner of the Notes. Bond Counsel will express no opinion regarding those consequences.

Payments of interest on tax-exempt obligations, including the Notes, are generally subject to IRS Form 1099-INT information reporting requirements. If a Note owner is subject to backup withholding under those requirements, then payments of interest will also be subject to backup withholding. Those requirements do not affect the exclusion of such interest from gross income for federal income tax purposes.

Legislation affecting tax-exempt obligations is regularly considered by the United States Congress, and legislation affecting the exemption of interest thereon for purposes of taxation by the State may be considered by the State legislature. Court proceedings may also be filed the outcome of which could modify the tax treatment of obligations such as the Notes. There can be no assurance that legislation enacted or proposed, or actions by a court, after the date of issuance of the Notes, will not have an adverse effect on the tax status of interest on the Notes or the market value of the Notes. These adverse effects could result, for example, from changes to federal or state income tax rates, changes in the structure of federal or state income taxes (including replacement with another type of tax), or the repeal (or reduction in the benefit) of the exclusion of interest on the Notes from gross income for federal or state income tax purposes. As an example, in recent years Congress has proposed budgets that include additional federal income taxes on taxpayers that own tax-exempt obligations, such as the Notes, if they have incomes above certain thresholds.

These and other legislative proposals may be considered or introduced that could affect, perhaps significantly, the market price of market ability of tax-exempt obligations, such as the Notes. Prospective purchasers of the Notes should consult their own tax advisers regarding pending or proposed federal and state tax legislation, court proceedings, or any new case law.

Prospective purchasers of the Notes at other than their original issuance at the respective prices indicated on the cover of this Official Statement should also consult their own tax advisers regarding other tax considerations such as the consequences of market discount, as to all of which Bond Counsel expresses no opinion.

Bond Counsel's engagement with respect to the Notes ends with the issuance of the Notes, and, unless separately engaged, Bond Counsel is not obligated to defend the Village or the beneficial owners regarding the tax status of interest on the Notes in the event of an audit examination by the IRS. The IRS has a program to audit tax-exempt obligations to determine whether the interest thereon is includible in gross income for federal income tax purposes. If the IRS does audit the Notes, under current IRS procedures, the IRS will treat the Village as the taxpayer and the beneficial owners of the Notes will have only limited rights, if any, to obtain and participate in judicial review of such audit. Any action of the IRS, including but not limited to selection of the Notes for audit, or the course or result of such audit, or an audit of other obligations presenting similar tax issues, may affect the market prices for the Notes.

DOCUMENTS ACCOMPANYING DELIVERY OF THE NOTES

Legal Matters

Legal matters incident to the authorization, issuance and sale of the Notes will be subject to the final approving opinions of The Law Offices of Jeffrey E. Storch, New York, New York, Bond Counsel to the Village. Such opinions will be available at the time of delivery of and payment for the Notes and will be to the effect that the Notes are valid and legally binding general obligations of the Village for the payment of which the Village has validly pledged its faith and credit, and all the real property within the Village subject to taxation by the Village, is subject to the levy by the Village of ad valorem taxes, subject to certain statutory limitations imposed by Chapter 97 of the New York Laws of 2011, for payment of the principal of and interest on the Notes, (**see "Tax Levy Limit Law," herein**).

Said opinions will also contain further statements to the effect that, assuming continuing compliance with certain covenants and the accuracy of certain representations of the Village contained in the record of proceedings relating to the authorization and issuance of the Notes, (a) interest on the Notes is excluded from gross income for federal income tax purposes and is not an item of tax preference for purposes of the federal alternative minimum tax and the Notes will be qualified tax-exempt obligations as defined in Section 265(b)(3) of the Code, (b) interest on the Notes is exempt from personal income taxes imposed by the State and political subdivisions thereof, including The City of New York and the City of Yonkers, (c) interest on the Notes may be subject to certain federal taxes imposed only on certain corporations, (d) the enforceability of the Notes is subject to bankruptcy laws and other laws affecting creditor's rights and the exercise of judicial discretion, and (e) the scope of the engagement of The Law Offices of Jeffrey E. Storch, as Bond Counsel in relation to the Notes, has extended solely to rendering the opinions expressed in said opinion, that said law firm is rendering no opinion other than the opinions expressly stated therein, and that said law firm expresses no opinion on the accuracy or completeness of any documents prepared by or on behalf of the Village for use in connection with the offer and sale of the Notes.

Closing Certificates

Upon delivery of and payment for the Notes, the purchaser(s) of the Notes will also receive, without cost, in form satisfactory to Bond Counsel the following, dated as of the date of delivery of and payment for the Notes: (a) a certificate or certificates evidencing execution, delivery and receipt of payment for the Notes; (b) a certificate or certificates executed by the officer of the Village who executed the Notes on behalf of the Village stating that (1) no litigation is then pending or, to the knowledge of such officer, threatened to restrain or enjoin the issuance or delivery of the Notes, (2) no authority or proceedings for the issuance of the Notes has or have been repealed, revoked or rescinded, and (3) the statements contained in this Official Statement on the date hereof and on the date of delivery of and payment for the Notes, were and are true in all material respects and did not, and do not, contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made therein, in light of the circumstances under which they were made, not misleading; (c) the unqualified legal opinion as to the validity of the Notes of The Law Offices of Jeffrey E. Storch, New York, New York, Bond Counsel, as more fully described under "Legal Matters" herein; (d) a Tax Compliance Certificate executed by the Administrator/ Treasurer of the Village; and (e) a continuing disclosure agreement executed by the Administrator/ Treasurer of the Village for purposes of SEC Rule 15c2-12 (the "Rule"), as amended, as described under the caption "Covenant To Make Continuing Financial Disclosure" herein.

COVENANT TO MAKE CONTINUING FINANCIAL DISCLOSURE

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

- (i) principal and interest payment delinquencies
- (ii) non-payment related defaults, if material
- (iii) unscheduled draws on debt service reserves reflecting financial difficulties
- (iv) in the case of credit enhancement, if any, provided in connection with the issuance of the Notes, unscheduled draws on credit enhancements reflecting financial difficulties
- (v) substitution of credit or liquidity providers, or their failure to perform
- (vi) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determination of taxability, Notices of Proposed Issue (IRS Form 5701 TEB) or other material notices of determination with respect to the tax status of the Note, or other material events affecting the tax status of the Notes
- (vii) modifications to rights of Noteholders, if material
- (viii) note calls, if material and tender offers
- (ix) defeasances
- (x) release, substitution, or sale of property securing repayment of the Notes, if material
- (xi) rating changes
- (xii) bankruptcy, insolvency, receivership or similar event of the Village
- (xiii) the consummation of a merger, consolidation, or acquisition involving the Village or the sale of all or substantially all of the assets of the Village, other than in the ordinary course of business or, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material
- (xiv) appointment of a successor or additional trustee or the change of name of a trustee, if material
- (xv) incurrence of a "financial obligation" of the issuer, if material, or agreement to covenants, events of default, remedies, priority rights or other similar terms of a financial obligation, any of which affect security holders, if material
- (xvi) default, event of acceleration, termination event, modification of terms or other similar events under a financial obligation of an Issuer, if any such event reflects financial difficulties.

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

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

With respect to event (xii) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the Village 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 Village, 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 Village.

With respect to events (xv) and (xvi) above, the term "Financial Obligation" means a (a) debt obligation; (b) derivative instrument entered into in connection with, or pledged as security or a source of payment for, an existing or planned debt obligation; or (c) guarantee of (a) or (b). The term Financial Obligation shall not include municipal securities as to which a final official statement has been provided to the MSRB consistent with the Rule.

The Village may from time to time choose to provide notice of the occurrence of certain other events, in addition to those listed above, if the Village determines that any such other event is material with respect to the Notes; but the Village does not undertake to commit to provide any such notice of the occurrence of any material event except those events listed above or any failure to comply in a timely manner with the requirements of the Rule.

The Village reserves the right to terminate its obligation to provide the afore described notice of material events, as set forth above, if and when the Village no longer remains an obligated person with respect to the Notes within the meaning of the Rule. The Village 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 Village's obligations under its material events notices undertaking and any failure by the Village 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. A Material Event Notices Certificate to this effect shall be provided to the purchaser at closing.

The Village is exempt from filing continuing disclosure under Rule 15c2-12 as the Notes have a maturity of eighteen months or less.

Continuing Disclosure Compliance History

Since 2007, there have been in excess of 50 rating actions reported by Moody's Investors Service, S&P Global Ratings and Fitch Ratings affecting the municipal bond insurance companies, some of which had insured bonds previously issued by the Village. Due to widespread knowledge of these rating actions, material event notices were not filed by the Village in such instances.

MUNICIPAL ADVISOR

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

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

RATING

The Village did not apply for a rating of the Notes.

On November 29, 2012 S&P Global Ratings ("S&P") affirmed the Village's "AA+" long term and underlying rating and revised its outlook to stable from negative.

Such rating reflects only the views of such rating agency and any desired explanation of the significance of such rating should be obtained from S&P at the following address: S&P Global Ratings, 55 Water Street, New York, New York 10041. 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 S&P, circumstances so warrant. Any such change or withdrawal of such rating may have an adverse effect on the market price of the Notes or the availability of a secondary market for the Notes.

ADDITIONAL INFORMATION

Additional information may be obtained from Christopher Scelza, Village Administrator/Village Treasurer, 195 Sparks Avenue, Pelham, New York 10803, (914) 738-6270, e-mail: chris.scelza@pelhamgov.com., or from the Village's Municipal Advisor, Capital Markets Advisors, LLC, 11 Grace Avenue, Suite 308, Great Neck, New York, 11021, (516) 274-4504.

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 Village and the original purchasers or holders of any of the Notes.

The Law Offices of Jeffrey E. Storch has not participated in the preparation of the demographic, financial or statistical data contained in this Official Statement, nor verified the accuracy, completeness of fairness thereof, and, accordingly expresses no opinion with respect thereto.

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

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

VILLAGE OF PELHAM,
WESTCHESTER COUNTY, NEW YORK

By: /s/____________________________
Christopher Scelza
Village Administrator/Village Treasurer

DATED: September __, 2021

APPENDIX A

THE VILLAGE

THE VILLAGE

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

General Information

The Village was originally incorporated in 1896 and then reincorporated in 1975 to combine Pelham Village and North Pelham. The Village encompasses an area of approximately one square mile within the Town of Pelham (the "Town"), borders the cities of New Rochelle and Mt. Vernon and is approximately four miles from the New York City line in the Bronx.

According to information obtained from the US Census Bureau, wealth levels in the Village are higher than the indices for the County taken as a whole and are significantly above State averages. Per-capita income for Village residents in 2019 was $77, 958 compared to $57,049 for the County and $39,326 Statewide. The per capita money income of Village residents increased by 66.2% between 1990 and 2010, a growth rate of more than 50% above County and State rates. Median household income in the Village in 2019 was estimated at $133,464, compared to $96,610 and $68,486 for families in the County and State, respectively.

Village residents find employment throughout the New York Metropolitan area, and many are employed in management or professional positions. Village residents are generally less dependent on manufacturing related employment than residents of the County or State. Unemployment statistics are not maintained for the Village; however, historically the percentage of unemployed persons in the Village is believed to be lower than the State or the United States averages. See "Economic and Demographic Data," herein.

Form of Government

The Village was established as a municipal government by the State and is vested with the powers and responsibilities inherent in the operation of municipal governments, including the adoption of rules and regulations to govern its affairs. In addition, the Village may tax real property within its boundaries and issue general obligation indebtedness, subject to the provisions of the State's Local Finance Law and the Tax Levy Limit Law. There is one school district in the Village, which has independent powers with respect to taxation and debt issuance. Village residents also pay real property taxes to the Town and the County to support programs administered by such governmental entities.

Government operations of the Village are subject to the provisions of the State Constitution and various statutes affecting village governments, including the Village Law, the General Municipal Law and the Local Finance Law. Real property assessment, collection, and enforcement procedures are determined by the Real Property Tax Law and the County Administrative Tax Code.

Board of Trustees. The Board of Trustees of the Village (the "Board") is the legislative, appropriating, governing and policy-making body of the Village and consists of six trustees and a Mayor, all of whom are elected at large to serve for two-year terms and the number of consecutive terms which may be served is unlimited. It is the responsibility of the Board to enact, by resolution, all legislation, including local laws. Annual operating budgets for the Village and modifications and transfers between budgetary appropriations must be authorized by the Board and the original issuance of all Village indebtedness is also subject to approval by the Board.

Mayor. The Mayor is elected for a two-year term of office with the right to succeed himself. In addition, the Mayor is a full member of the Board and also its presiding officer.

Village Administrator / Treasurer. The Village operates with a Village Administrator who serves at the pleasure of the Mayor and the Board and who is the Chief Administrative Officer of the Village, responsible for its day-to-day operations. The Village Administrator oversees and supervises the activities of all Village departments. In addition, the Village Administrator is responsible for the fair and efficient administration of the Village rules, regulations and laws. The Village Administrator also acts as the Budget Officer of the Village.

The Village Treasurer is appointed by the Board for a one-year term and is the chief fiscal officer of the Village. Presently, the Village Administrator also serves as the Village Treasurer. Duties and responsibilities of the position are as follows: maintain the Village's accounting systems and records including the preparation and filing of the Village's annual financial report with the State Comptroller, custody and investment of Village funds, and debt management.

Village Clerk. The Village Clerk is appointed by the Board for a one-year term. The Village Clerk has custody of the corporate seal, books, records and papers of the Village, as well as of all the official reports and communications of the Board. In addition, the Village Clerk serves as the clerk to the Board and various other Village boards and keeps the records of their proceedings. The Village Clerk is responsible for maintaining the Village code for building, plumbing, electric, zoning, vehicle and traffic regulations, and general ordinances.

Services and Programs

The Village provides its residents with most of the services traditionally provided by village governments in the State. In addition, the Town and County furnish certain other services. A list of these services provided by the Village are as follows: police protection and law enforcement; firefighting and emergency services; storm and sanitary sewers; refuse collection (the Village is a member of the County Refuse District No. 1); highway and public facilities maintenance; cultural and recreational activities; building code enforcement; and planning and zoning administration.

Village Development

On February 4, 2020, the Village authorized the creation of a local development corporation (the "LDC") under Section 1411(b) of the New York Not-For-Profit Corporation Law to assist with and promote economic development in the Village. The LDC Board includes both Village trustees and local business people and is currently exploring various ways to increase business development and job creation within the Village.

Employees

The Village employs 61 full-time employees and 19 part-time employees. Certain employees are represented by one of four unions. The following table summarizes of each collective bargaining units.

Union Representation	Number of Employees	Contract Expiration Date
CSEA – Department of Public Work Employees	10	05-31-22
CSEA – Parking Enforcement Officers & School Crossing Guards	14	05-31-24
Pelham Professional Firefighters Association, Inc.	17	05-31-24
Pelham Police Benevolent Association, Inc.	23	05-31-21[1]

(1) Currently under negotiations

Source: Village Officials.

Employee Benefits

Substantially all employees of the City are members of the New York State and Local Employees Retirement System ("ERS") or the New York State and Local Police and Fire Retirement System ("PFRS") (ERS and PFRS are referred to collectively hereinafter as the "Retirement System" where appropriate). The Retirement System is a cost-sharing multiple public employer retirement system. The obligation of employers and employees to contribute and the benefits to employees are governed by the New York State Retirement and Social Security Law (the "Retirement System Law"). The Retirement System offers a wide range of plans and benefits which are related to years of service and final average salary, vesting of retirement benefits, death and disability benefits and optional methods of benefit payments. All benefits generally vest after five years of credited service, except for members hired on or after January 1, 2010 whose benefits vest after ten years of credited service. The Retirement System Law generally provides that all participating employers in the Retirement System are jointly and severally liable for any unfunded amounts. Such amounts are collected through annual billings to all participating employers. Generally, all employees, except certain part-time employees, participate in the Retirement System. The Retirement System is non-contributory with respect to members hired prior to July 27, 1976. All members hired on or after July 27, 1976 through and including December 31, 2009, must contribute three percent of their gross annual salary toward the costs of retirement programs until they attain ten years in the Retirement System, at such time contributions become voluntary. Members hired after on or after January 1, 2010 must contribute three or more percent of their gross annual salary toward the costs of retirement programs for the duration of their employment.

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

Police officers and firefighters who are members of PFRS are divided into four tiers. As with ERS, retirement benefit plans available under PFRS are most liberal for Tier 1 employees. The plans adopted for PFRS employees are noncontributory for Tier 1 and Tier 2 employees. Police officers and firefighters that were hired between July 1, 2009 and January 8, 2010 are currently in Tier 3, which has a 3% employee contribution rate by members. There is no Tier 4 in PFRS. Police officers and firefighters hired after January 9, 2010 are in Tier 5 which also requires a 3% employee contribution from members. Police officers and firefighters hired after April 1, 2012 are in Tier 6, which also originally had a 3% contribution requirement for members for FY 12-13; however, as of April 1, 2013, Tier 6 PFRS members are required to contribute a specific percentage of their annual salary, as follows, until retirement or until the member has reached 32 years of service credit, whichever occurs first: $45,000.00 or less contributes 3%; $45,000.01 to $55,000.00 contributes 3.5%; $55,000.01 to $75,000.00 contributes 4.5%; $75,000.01 to $100,000.00 contributes 5.75%; and more than $100,000.00 contributes 6%.

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

The New York State Retirement System allows municipalities to make employer contribution payments in December of each year, at a discount, or the following February, as required. The Village has generally opted to make its pension payments in December in order to take advantage of the discount and anticipates making the payment for the current fiscal year in December.

Due to significant capital market declines in 2008 and 2009, the State's Retirement System portfolio experienced negative investment performance and severe downward trends in market earnings. As a result of the foregoing, the employer contributions for the State’s Retirement System continue to be higher than the minimum contribution rate established by Chapter 49. Legislation was enacted that permits local governments and school districts to borrow a portion of their required payments from the State pension plan at an interest rate of 5%. The legislation also requires those local governments and school districts that amortize their pension obligations pursuant to the regulation to establish reserve accounts to fund payment increases that are a result of fluctuations in pension plan performance. The Village does not currently amortize any pension payments.

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

On August 29, 2019, the State Comptroller announced that for fiscal year 2020-21, the average contribution rates for ERS will remain the same and the average contribution rates for PFRS will increase 0.9% from 23.5% to 24.4% when compared to the current fiscal year 2019-20. Projections of required contributions will vary by employer depending on factors such as retirement plans, salaries and the distribution of their employees among the six retirement tiers.

ERS and PFRS Contributions.

A five year history of the Village's actual retirement expenditures and the amounts budgeted for the fiscal year ending in 2021 are provided in the following table:

Fiscal Year Ended May 31:	ERS	PFRS
2016	$273,362	$1,331,626
2017	225,283	1,266.190
2018	236,696	1,183,243
2019	222,617	1,141,675
2020	209,072	1,234,188
2021 (Unaudited)	234,946	1,309,003
2021 (Budget)	263,000	1,663,000

Source: Village Officials and the 2021 adopted budget.

Other Postemployment Benefits

For fiscal years beginning after June 15, 2017, the Village is subject to GASB Statement No. 75 ("GASB 75") which replaces GASB 45. GASB 75 requires state and local governments to account for and report their costs associated with post-retirement healthcare benefits and OPEB. GASB 75 generally requires that employers account for and report the annual cost of the OPEB and the outstanding obligations and commitments related to OPEB similarly to GASB Statement NO. 68 reporting requirements for pensions. GASB 75 requires state and local governments to measure a defined benefit OPEB plan as the portion of the present value of projected benefit payments to be provided to current active and inactive employees, attributable to past periods of service in order to calculate the total OPEB liability. Total OPEB liability generally is required to be determined through an actuarial valuation using a measurement date that is no earlier than the end of the employer's prior fiscal year and no later than the end of the employer's current fiscal year. GASB 75 requires that most changes in the OPEB liability be included in OPEB expense in the period of the changes. Based on the results of an actuarial valuation, certain changes in the OPEB liability are required to be included in OPEB expense over current and future years. At this time, New York State has not developed guidelines for the creation and use of irrevocable trusts for the funding of OPEB. As a result, the Village will continue funding this expenditure on a pay-as-you-go basis. As of May 31, 2020, the Village's net OPEB liability under GASB 75 was $50,640,798.

Legislation has been proposed to create an optional investment pool to help the State and local governments fund retiree health insurance and other post-employment benefits. The proposed legislation would authorize the creation of irrevocable OPEB trusts so that the State and its local governments can help fund their OPEB liabilities, establish an OPEB investment fund in the sole custody of the State Comptroller for the investment of OPEB assets of the State and participating eligible local governments, designate the president of the Civil Service Commission as the trustee of the State's OPEB trust and the governing boards as trustee for local governments and allow school districts to transfer certain excess reserve balances to an OPEB trust once it is established. Under the proposed legislation, there are no limits on how much a local government can deposit into the trust. The Village cannot predict at this time whether such proposed legislation will be enacted into law.

See "Notes to Financial Statements, Note 3-F" in the Audited Financial Statements for the year ended May 31, 2020.

FINANCIAL FACTORS

Budgetary Procedure

The Village Administrator, also the Budget Officer of the Village, submits the tentative budget for next fiscal year to the Board on or before March 20th. The Board may make such changes or revisions as they deem appropriate subject to the provision of law. A public hearing is held on the budget not later than April 15th. Members of the public may express their views on the budget but there is no provision for a formal vote on the budget. Following the public hearing and on or before May 1st, the Board adopts the final budget. A copy of such budget must be filed with the Village Clerk and is available for public inspection.

Budgetary control is the responsibility of the Village Administrator. The Administrator supervises all encumbrances, expenditures and disbursements, including the auditing of all vouchers, to ensure that budget appropriations are not exceeded.

Summaries of the adopted budgets for fiscal years 2020 and 2021 are presented in Appendix B of this Official Statement. Full copies of adopted budgets may be obtained by request from the Village Administrator/Treasurer or from the Village's Municipal Advisor.

Independent Audits

The Village retained the firm of PKF O'Connor Davies, LLP, Certified Public Accountants, to audit its financial statements for the fiscal year ended May 31, 2020. Appendix B, attached hereto, presents excerpts from the Village's most recent audited reports covering the last five fiscal years. Appendix C contains a link to the fiscal year ending 2020 audit.

State Audits. In addition, the Village is subject to audit by the State Comptroller to review compliance with legal requirements and the rules and regulations established by the State.

A State audit report reviewing the Village's information technology was made available on April 7, 2017. A complete copy of the report is available on the State Comptroller's website.

See "The State Comptroller's Fiscal Stress Monitoring System and Compliance Reviews" herein.

Investment Policy

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

Authorized Investments. The Village has designated two banks or trust companies located and authorized to conduct business in the State to receive deposits of money, including certificates of deposits, from the Village. In addition, the Village is authorized to invest through an investment cooperative.

In addition to bank deposits, the Village is permitted to invest moneys in direct obligations of the United States of America, obligations guaranteed by agencies of the United States where the payment of principal and interest are further guaranteed by the United States of America and obligations of the State.

The Village may also utilize repurchase agreements to the extent such agreements are based upon direct or guaranteed obligations of the United States of America. Repurchase agreements are subject to the following restrictions, among others: all repurchase agreements are subject to a master repurchase agreement and are limited to a maximum maturity of 15 days; trading partners are limited to banks or trust companies authorized to conduct business in the State or primary reporting dealers as designated by the Federal Reserve Bank of New York; securities may not be substituted; and the custodian for the repurchase security must be a party other than the trading partner. All purchased obligations, unless registered or inscribed in the name of the Village, must be purchased through, delivered to and held in the custody of a bank or trust company located and authorized to conduct business in the State.

Collateral Requirements. All Village deposits in excess of the applicable insurance coverage provided by the Federal Deposit Insurance Act must be secured in accordance with the provisions of and subject to the limitations of Section

10 of the General Municipal Law of the State. Such collateral must consist of the "eligible securities," "eligible surety bonds" or "eligible letter of credit" as described in the Law.

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

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

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

Revenues

The Village derives its revenues primarily from real property taxes and special assessments, State aid and departmental fees and charges. A summary of such revenues for the fiscal years ending in 2016 through 2020 is presented in Appendix B, hereto. Information for said fiscal years has been excerpted from the Village's audited financial reports, however, such presentation has not been audited.

Property Taxes. The Village derives a major portion of its revenues from a tax on real property (see "Statement of Revenues, Expenditures and Changes in Fund Balance" in Appendix B). Excluding other financing sources, real property taxes accounted for approximately 73.7% of General Fund revenues for the fiscal year ended May 31, 2020.

The following table sets forth General Fund revenue and real property taxes received for each of the past five audited fiscal years and the amounts budgeted for the two most recent fiscal years.

General Fund Revenue & Real Property Taxes

Fiscal Year Ended May 31:	General Fund Revenue (1)	Real Property Taxes	Taxes to Revenue
2016	$14,012,778	$10,566,305	75.4%
2017	14,051,324	10,676,574	76.0
2018	14,387,896	10,822,448	75.2
2019	15,122,220	10,995,145	72.7
2020	15,295,697	11,278,619	73.7
2021 (Budget)	15,795,071	11,567,385	73.2
2022 (Budget)	16,169,560	12,373,474	76.5

(1) Excludes other financing sources.
Source: The Audited Financial Statements and Adopted Budgets of the Village. The summary itself is not audited.

State Aid. The Village receives financial assistance from the State. State Aid accounted for approximately 1.3% of the General Fund operating revenues for the fiscal year ending in 2020. A substantial portion of the State aid received is directed to be used for specific programs. If the State should experience difficulty in borrowing funds in anticipation of the receipt of State taxes in order to pay State aid to municipalities and school districts in the State, including the Village, in any year or future years, the Village may be affected by a delay in the receipt of State aid until sufficient State taxes have been received by the State to make State aid payments. Additionally, if the State should not adopt its budget in a timely manner, municipalities and school districts in the State, including the Village, may be affected by a delay in the payment of State aid.

The State is not constitutionally obligated to maintain or continue State aid to the Village. No assurance can be given that present State aid levels will be maintained in the future. Currently, due the outbreak of COVID-19 the State has 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. The outbreak of COVID-19 and the dramatic steps taken by the State to address it are expected to negatively impact the State's economy and financial condition. The full impact of COVID-19 upon the State is not expected to be known for some time; however, it is anticipated that the State will experience budgetary restrictions which will require certain gap-closing actions. Such actions may include, but are not limited to: reductions in State agency operations and/or the delay, elimination or substantial reduction in payments to municipalities, school districts or other recipients of State aid in the State. If this were to occur, reductions in the payment of State aid could adversely affect the financial condition of municipalities and school districts in the State, requiring either a counterbalancing increase in revenues from other sources to the extent available, or a curtailment of expenditures (See also "Market Factors," herein.)

The following table sets forth General Fund revenues and State aid received for each of the past five audited fiscal years and the amounts budgeted for the two most recent fiscal years.

General Fund Revenue & State Aid Revenue

Fiscal Year Ended May 31:	General Fund Revenue (1)	State Aid	State Aid to Revenue
2016	$14,012,778	$272,659	1.9%
2017	14,051,324	287,565	2.0
2018	14,001,078	271,654	1.9
2019	15,122,220	265,568	1.8
2020	15,295,697	200,717	1.3
2021 (Budget)	15,795,071	193,500	1.2
2022 (Budget)	16,169,560	187,000	1.2

(1) Excludes other financing sources.

Source: Audited Financial Statements and Adopted Budgets of the Village. The summary itself not audited.

Sales Tax. The Village receives a share of the County sales tax. The County presently imposes a 1 ½% County-wide sales and use tax on all retail sales. Additionally, the State, effective May 1, 2005, imposes a 4% State sales tax and a 3/8% sales tax levied in the Metropolitan Transportation Authority District. The cities in the County have the power under State law to impose by local law and State legislative enactment their own sales and use taxes. At present, such taxes are imposed at a rate of 2½% in the Cities of White Plains, Mount Vernon, New Rochelle, and Yonkers. The Cities of Rye and Peekskill do not impose such a sales tax.

In July 1991, the State Legislature authorized an additional 1% sales tax for the County to impose in localities other than cities which have their own sales tax. This additional 1% sales tax became effective on October 15, 1991 and has been extended through May 31, 2020. The additional 1% sales tax is to be apportioned between the County (33 1/3%), school districts in the County (16 2/3%) and towns, villages and cities in the County which have imposed sales taxes (50%).

In February of 2004, the State Legislature authorized an increase of ½% to the additional 1% 1991 sales tax. The County retains 70% of this amount, the municipalities 20% and the school districts 10%. This increase became effective March 1, 2004 and expired on May 31, 2020.

In April of 2019, the State Legislature authorized an increase of 1% to the County sales tax, raising the rate to 8.375% in County localities other than cities. The rate increase is effective as of August 1, 2019 and expires on November 30, 2020.

The following table sets forth General Fund revenue and sales taxes received for each of the past five audited fiscal years ended May 31 and the amounts budgeted for the two most recent fiscal years.

General Fund Revenue & Sales Tax

Fiscal Year Ended May 31:	General Fund Revenue (1)	Sales Tax	Sales Tax to Revenue
2016	$14,012,778	$1,004,946	7.2%
2017	14,051,324	1,015,402	7.2
2018	14,001,078	1,000,000	7.1
2019	15,122,220	1,117,227	7.4
2020	15,397,622	1,366,310	8.9
2021 (Unaudited)	15,565,512	1,497,999	9.6
2022 (Budget)	16,169,560	1,520,000	9.4

(1) Excludes other financing sources.

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

REAL PROPERTY TAXES

The Village derives its power to levy an ad valorem real property tax from the Constitution of the State, subject to the applicable provisions of Chapter 97 of the New York Laws of 2011. See "Property Tax Limit," "Market Factors" and "Tax Levy Limit Law," herein. The Village's power to levy real property taxes, other than for debt service and certain other purposes, are limited by the State Constitution to two percent of the five-year average full valuation of taxable property of the Village.

Assessed and Full Valuations

Taxable Assessed and Full Valuations

Fiscal Year Ending May 31:	2018	2019	2020	2021	2022
Taxable Assessed Valuation	$1,356,409,817	$1,427,546,491	$1,486,245,061	$1,549,221,968	$1,592,450,258
State Equalization Rate (1)	100%	100%	100%	100%	100%
Full Valuation	$1,356,409,817	$1,427,546,491	$1,486,245,061	$1,549,221,968	$1,592,450,258

(1) Final rates as determined by the New York State Office of Real Property Tax Services (the "ORPTS").

Source: Village Officials.

See also "Tax Levy Limit Law."

Property Tax Limit

In accordance with Article 8, Section 10 of the New York State Constitution, the amount of real property taxes that may be raised by the Village in any fiscal year is limited to two per centum (2%) of the five-year average full valuation of the taxable real estate of the Village plus: (1) the amounts required for principal and interest on all capital indebtedness, and (2) current appropriations for certain capital purposes. The following table shows the Constitutional tax margin of the Village for the fiscal year ending May 31, 2022. See also "Tax Levy Limit Law" attached hereto.

Computation of Real Estate Property Tax Levying Limitation
Year Ending May 31, 2022

Total of Full Valuations (5 Years)	$ 7,411,873,595
Five-Year Average Full Valuation	1,482,374,719
Tax Limit (2% of Average Full Valuation)	$29,647,494
Tax Levy	12,373,474
Less: Total Exclusions	(454,358)
Tax Levy Subject to Tax Limit	11,919,116
Constitutional Tax Margin	$ 17,728,378

Source: The Statement of Constitutional Tax Limit for the year ending May 31, 2022.

Tax Collection Procedures

The Village Board levies real property taxes pursuant to resolution and such taxes become a lien on the first day of June. Taxes are payable in a single installment. Payments made after June 30th must include a 5% penalty for the first month or fraction thereof and an additional 1% penalty for each month or part of a month thereafter. The tax warrant expires on February 1st**,** at which time the Town of Pelham Receiver of Taxes, who is responsible for collecting the Village taxes, files a listing of the unpaid taxes for the year with the Village.

Unpaid real property taxes are enforced pursuant to Article 11 of the Real Property Tax Law. The State made certain changes to this law in 1995 which eliminated annual tax sales and reduced the period for redeeming unpaid taxes to two years from the lien date. A notice of unpaid taxes is mailed to the property owner approximately 30 days following the last day on which a tax payment for the year may be made without penalty. Subsequent notices are mailed periodically through the time the Village records a tax lien on its books. The Village generally records such liens on the first Monday in March in the calendar year following the lien date. If the taxes remain unpaid for a period of two years from the lien date, the Village may foreclose on the related property. A notice of foreclosure is filed with the State Supreme or the County Court three months prior to the expiration of the redemption period. The Village may sell any property acquired for taxes to the highest bidder at a public auction or in-lieu of such auction by approval of the Board.

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Tax Levies and Collection Record

The following table sets the Village's real property tax levy and collections for each of the past five completed fiscal years and year to date collections for the current year.

Real Property Tax Levy and Collection Record

Fiscal Years Ended May 31:	Taxes Levied For Year	Current Taxes Collected	Delinquent Taxes Collected	Total Taxes Collected	% Taxes Collected
2017	$10,627,080	$10,615,453	$57,878	$10,673,331	100.44%
2018	10,787,458	10,773,951	28,498	10,802,449	100.14
2019	11,002,839	10,984,584	4,492	10,989,076	99.87
2020	11,273,257	11,234,940	27,347	11,262,287	99.90
2021	11,567,385	11,538,337	30,458	11,568,795	100.01
2022 (1)	12,373,474	12,181,401	15,693	12,197,094	98.57

(1) As of July 31, 2021.

Source: Village Officials.

Real Property Tax Rates

The following table sets the Village's real property tax rate for each of the fiscal years ending in 2018 through 2022.

Village Tax Rates Per $1,000 of Assessed Valuation
2018-2022

Fiscal Year Ending May 31:	Homestead Tax Rate	Non-Homestead Tax Rate
2018	$7.54	$10.72
2019	7.29	10.59
2020	7.22	10.04
2021	7.11	9.88
2022	7.38	10.23

Source: Village Officials.

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Largest Taxpayers

Largest Taxpayers in the Village
2021 Tax Roll (For the Collection of 2021-22 Taxes)

Taxpayer (a)	Classification	Assessed Value	% of Total Assessed Valuation [1]
Con Edison	Utility	$38,309,092	2.41%
Pico Electronics	Manufacturing	9,200,000	0.58
Caspi [2]	Warehouse	8,090,000	0.51
Broadview Properties	Apartments	7,265,000	0.46
North Pelham Apartments	Apartments	5,855,000	0.37
South-Glo Properties, Inc.	Apartments	5,678,000	0.36
Santomero Properties [2]	Retail Shopping	5,490,000	0.34
Suez Water Westchester	Utility	5,416,968	0.34
Acquisition America	Apartments	4,100,000	0.26
PVA, LLC [2]	Retail Shopping	3,350,000	0.21
		$92,754,060	5.82%

(1) Taxable assessed values for the year ending May 31, 2022 were $1,592,450,258.
(2) Pending tax certiorari.

Source: Village Officials.

VILLAGE INDEBTEDNESS

Constitutional Requirements

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

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

The Village may contract indebtedness only for a Village 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 expiration of the period of probable usefulness of the object or purpose as determined by statute or, in the alternative, the weighted average period of probable usefulness of the several objects or purposes for which it is contracted. No installment may be more than fifty per centum in excess of the smallest prior installment, unless the Village determines to issue a particular debt obligation amortizing on the basis of substantially level or declining annual debt service. The Village 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 and such required annual installments on its notes.

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

Statutory Procedure

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

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

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

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

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

In addition, under each bond resolution, the Village Board of Trustees may delegate the power to issue and sell bonds and notes to the Treasurer, the chief fiscal officer of the Village.

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

Constitutional Debt-Contracting Limitation

ORPTS annually establishes State equalization rates for all assessing units in the State, including the Village, which are determined by statistical sampling of market/assessment studies. The equalization rates are used in the calculation and distribution of certain state aids and are used by many localities in the calculation of debt contracting and real property taxing limitations. The Village has a debt contracting limitation equal to seven percent (7%) of average full valuation (See "Constitutional Requirements, Debt Limit," herein).

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

Computation of Constitutional
Debt Contracting Limitation
As of August 30, 2021

Fiscal Year Ending May 31:	Assessed Valuation	State Equalization Rate [1]	Full Valuation
2022	$ 1,592,450,258	100.00%	$1,592,450,258
2021	1,549,221,968	100.00	1,549,221,968
2020	1,486,245,061	100.00	1,486,245,061
2019	1,427,546,491	100.00	1,427,546,491
2018	1,356,409,817	100.00	1,356,409,817
Total Full Valuation			$7,411,873,595
Five-Year Average Full Valuation			$1,482,374,719
Debt Contracting Limitation: 7% of Five-Year Average Full Valuation			$ 103,766,230

(1) Determined by the ORPTS.

Statutory Debt Limit and Net Indebtedness

Statement of Debt Contracting Power
As of August 30, 2021

	Amount	Percentage
Debt Contracting Limitation:	$103,766,230	100%
Gross debt:		
Serial Bonds	1,250,000	1.20
Bond Anticipation Notes	3,005,710	2.90
Gross Indebtedness	4,255,710	4.10
Less Exclusions:		
Unexpended Appropriations To Pay Non-Exempt Principal Debt	115,000	0.11
Total Exclusions	115,000	0.11
Net Indebtedness	4,140,710	3.99
Net Debt Contracting Margin	$99,625,520	96.01%

Bond Anticipation Notes

Bond anticipation notes may be sold to provide moneys for capital projects once a bond resolution has been adopted. Generally, bond anticipation notes are issued in anticipation of the sale of bonds at some future date and may be renewed from time to time up to five years from the date of the first note in most instances. Notes may not be renewed after the second year unless there is a principal payment on such notes from a source other than the proceeds of bonds. In no event, may bond anticipation notes be renewed after the sale of bonds in anticipation of which the notes were originally issued.

The following two tables present a five-year history of the Village's bond anticipation notes.

Bond Anticipation Notes – End of Year
Fiscal Years Ended May 31:

2017	2018	2019	2020	2021[1]
$315,720	$3,765,990	$3,617,600	$3,265,100	$3,005,710

(1) Unaudited
Source: The Audited Financial Statements of the Village. The summary itself has not been audited.

Tax and Revenue Anticipation Notes

The Village is also authorized by law to issue tax anticipation notes and revenue anticipation notes to provide cash to pay operating expenditures. Borrowings for these purposes are restricted by formulas contained in the Local Finance Law and Regulations issued under the U.S. Internal Revenue Code. Such notes may be renewed from time to time but generally not beyond three years in the case of revenue anticipation notes and five years for tax anticipation notes.

The Village has not issued tax or revenue anticipation notes during the last five fiscal years and does not expect to issue such notes during the current fiscal year.

Trend of Capital Debt

The following table sets forth the total amount of bonds outstanding at the end of each of the last five years.

Bonded Debt History

Years Ended May 31:	Bonded Debt
2016	$2,275,000
2017	2,075,000
2018	1,875,000
2019	1,660,000
2020	1,455,000
2021[1]	1,250,000

(1) Unaudited

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Overlapping and Underlying Debt

Statement of Direct and Overlapping Indebtedness
As of August 30, 2021

Village Gross Direct Indebtedness	$4,255,710
Village Exclusions and Deductions	115,000
Village Net Direct Indebtedness	$4,140,710

Overlapping Units	Date of Report	Net Overlapping Debt	Percentage Applicable	Applicable Net Overlapping Debt
Westchester County	03-31-21	$903,852,566	0.77%	$6,959,665
Town of Pelham	12-31-18	-0-	44.65	-0-
Pelham UFSD	10-14-20	57,745,000	44.42	25,650,329
Total				$32,609,994

Source: County, Town and School District officials and the Municipal Securities Rulemaking Board.

Debt Ratios

The following table sets forth certain debt ratios based upon the Village's direct and overlapping debt.

Net Direct and Overlapping Debt Ratios

	Amount	Debt Per Capita (1)	Debt To Full Value (2)	Per Capita Debt To Per Capita Income (3)
Net Direct Debt	$ 4,140,710	$ 596	0.26%	0.76%
Net Direct and Overlapping Debt	32,609,994	4,694	2.05	6.02

(1) According to interim data from the US Census Bureau, the population of the Village was estimated at 6,947 for 2019.
(2) The full valuation of the Village for the fiscal year ending May 31, 2022 is $1,592,450,258.
(3) The 2019 per capita income of Village residents is $77,958.

Authorized But Unissued Debt

At this time, Village has no authorized but unissued debt.

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Debt Service Schedule

The following table shows the annual debt service requirements to maturity on the Village's outstanding general obligation bonded indebtedness.

Schedule of Debt Service Requirements

Years Ending May 31:	Principal	Interest	Total Debt Service	Cumulative Principal Paid
2021 (1)	$205,000	$43,825	$248,825	24.70%
2022	115,000	38,363	153,363	31.63
2023	90,000	35,375	125,375	37.05
2024	90,000	32,788	122,788	42.47
2025	95,000	30,013	125,013	48.19
2026	95,000	27,163	122,163	53.92
2027	100,000	24,175	124,175	59.94
2028	105,000	20,906	125,906	66.27
2029	105,000	17,494	122,494	72.59
2030	110,000	13,931	123,931	79.22
2031	110,000	10,150	120,150	85.84
2032	115,000	6,213	121,213	92.77
2033	120,000	2,100	122,100	100.00
	$ 1,455,000	$ 302,496	$ 1,757,496	

(1) Full Fiscal Year

ECONOMIC AND DEMOGRAPHIC DATA

Population

Population

	2000	2010	2019	% Change 2000-2010	% Change 2010-2019
Village	6,400	6,910	6,947	8.0%	0.5%
Town	11,866	12,396	12,481	4.5	0.7
County	923,459	949,113	967,506	2.8	1.9
State	18,976,457	19,378,102	19,453,561	2.1	0.3

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

Income

The following tables indicate comparative income statistics for the Village, Town, County and State.

Per Capita Money Income

	2010	2019	% Change
Village	$63,951	$77,958	21.9%
Town	71,707	81,056	13.0
County	47,814	57,049	19.3
State	30,948	39,326	27.1

Source: Bureau of the Census

Employment

The table below provides certain information about the level of jobs in the County and State. Unemployment rates are presented for the County, State and United States. Such rates are provided for informational purposes only and are not necessarily representative of the employment conditions in the Village. The major employers in the County are also listed.

Average Employed Civilian Labor Force
2000 - 2019

				% Change	
	2000	2010	2019	2000-2010	2010-2019
County	445,400	443,500	466,200	(0.4)	5.1
State	8,718,700	8,769,700	9,137,600	0.6	4.2

Source: New York State Department of Labor.

Average Unemployment Rates

Year	County	State
2013	6.3%	7.7%
2014	5.1	6.3
2015	4.6	5.3
2016	4.2	4.8
2017	4.6	4.7
2018	4.1	4.2
2019	3.8	4.0
2020	8.4	10.0
2021		
Jan	6.6	9.4
Feb	7.0	9.7
Mar	6.2	8.4
Apr	5.4	7.7
May	4.9	7.0
Jun	5.2	7.3

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

Figures in this section are historical and do not speak as to current or projected employment rates. Unemployment has drastically increased since mid-March 2020 due to the COVID-19 global pandemic. (See "RISK FACTORS", "Impacts of COVID-19" and "Finances" herein)

Major Private Sector Employers in the County

Name Of Business	Nature Of Business
IBM Corp.	Computer hardware and software
PepsiCo Inc.	Soft drinks and snack foods
Consolidated Edison Inc.	Utility Services
MasterCard	Credit card services
ITT Corp.	Water and fluid management
Westchester Medical Center	Hospital and health care services
Regeneron Pharmaceuticals Inc.	Pharmaceuticals
New York Medical College	Medical college and research
Pace University	Private co-educational university
White Plains Hospital	Hospital and health care services
St. John's Riverside Hospital	Hospital and health care services

Source: Westchester County Official Statement April 14, 2020.

Education

Primary and secondary education for children in the Village is provided by the Pelham Union Free School District.

Financial Institutions

Various banking facilities are available to Village residents. The following commercial banks have offices in or are proximate to the Village: Bank of America N.A., Citibank N.A., HSBC Bank USA, JPMorgan Chase Bank N.A., TD Bank N.A., and TRUSTCO Bank. As of June 30, 2019, total funds deposited at banks located in the Village were approximately $1,018 billion, according to the Federal Deposit Insurance Corporation.

Transportation

The Village is served by all major forms of transportation. Highway facilities include U.S. Route 1, Interstate 95 and the Hutchinson River Parkway, which runs through or near the Village. Commuter rail transportation is provided by the Connecticut Line of the Metro North Railroad. Freight rail service is provided by CSX. Domestic and international airline service is available at the New York airports (LaGuardia Airport, Newark Airport and Kennedy International Airport) which are located less than one hour by automobile. The County Airport, serving primary U.S. cities, is located about 20 miles from the Village limits.

Utilities

The Consolidated Edison Company provides residents with gas and electric utility services. Telephone service is provided by Verizon. Sewage collection is a Village function and the County is responsible for treating sewage.

The Village is a part of the County Refuse District No. 1, which operates a mass-burn resource recovery facility in the City of Peekskill located in the northwest corner of the County. Properties located in the County Refuse District, including the Village, are subject to annual assessments to pay service charges for processing solid waste as well as operating and capital expenses of such district.

END OF APPENDIX A

APPENDIX B

FINANCIAL STATEMENT SUMMARIES

Summaries have not been audited

VILLAGE OF PELHAM
BALANCE SHEET
GENERAL FUND
UNAUDITED PRESENTATION

	AS OF MAY 31:				
	2016	2017	2018	2019	2020
ASSETS					
Cash And Equivalents	$ 2,573,396	$ 2,229,594	$ 1,657,636	$ 1,808,509	$ 1,593,064
Investments	60,442	0	502,517	0	0
Other Receivables:					
Accounts	133,489	133,305	125,335	202,374	260,845
Due From Other Goverments	93,304	113,926	99,511	108,499	105,461
Prepaid Expenditures	0	0	0	334,332	0
Due From Other Funds	13	331,543	10,315	32,136	1,953
Total Assets	$ 2,860,644	$ 2,808,368	$ 2,395,314	$ 2,485,850	$ 1,961,323
LIABILITIES AND FUND BALANCE					
Liabilities:					
Accounts Payable	$ 65,648	$ 91,545	$ 157,172	$ 262,773	$ 192,121
Accrued Liabilities	76,606	109,013	39,429	149,348	317,300
Due To Retirement Systems	324,922	232,036	239,805	293,062	259,485
Due To Other Funds	190,000	0	0	0	0
Total Liabilities	657,176	432,594	436,406	705,183	768,906
Fund Balance:					
Nonspendable	0	0	0	334,332	0
Restricted	0	0	0	29,629	21,452
Assigned	61,644	186,948	254,750	144,651	0
Unassigned	2,141,824	2,188,826	1,704,158	1,272,055	1,170,965
Total Equity Balance	2,203,468	2,375,774	1,958,908	1,780,667	1,192,417
Total Liabilities and Equity Balance	$ 2,860,644	$ 2,808,368	$ 2,395,314	$ 2,485,850	$ 1,961,323

The financial data presented on this page has been excerpted from the audited financial statements of the Village.

Summary presentation herein has not been audited.

Complete copies of the Village's audited financial statements are available upon request to the Village.

VILLAGE OF PELHAM
GENERAL FUND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
UNAUDITED PRESENTATION

	FISCAL YEAR ENDED MAY 31:				
	2016	2017	2018	2019	2020
REVENUES:					
Real Property Taxes	$ 10,566,305	$ 10,676,574	$ 10,822,448	$ 10,995,145	$ 11,278,619
Other Tax Items	27,050	33,093	29,348	19,156	23,114
Non-Property Taxes	1,291,144	1,277,202	1,341,838	1,384,345	1,625,618
Departmental Income	806,513	848,194	864,491	903,478	767,493
Intergovernmental Charges	2,192	2,302	2,440	2,635	2,846
Use Of Money And Property	130,775	142,073	160,321	252,055	309,039
Licenses And Permits	263,624	273,407	348,291	485,945	242,421
Fines and Forfeitures	388,460	380,653	346,642	431,786	341,648
Sale Of Property And Compensation For Loss	16,050	(20,062)	2,354	29,909	47,783
State Aid	272,659	287,565	273,370	265,568	200,717
Federal Aid	0	0	0	0	27,343
Miscellaneous	248,006	150,323	196,353	352,198	429,056
Total Revenues	14,012,778	14,051,324	14,387,896	15,122,220	15,295,697
EXPENDITURES:					
Current:					
General Government Support	1,114,551	1,130,651	1,317,030	1,339,606	1,540,250
Public Safety	6,157,834	6,076,024	6,200,938	6,489,680	6,789,127
Transportation	651,910	470,221	674,625	623,220	475,506
Culture and Recreation	352,949	370,036	352,710	377,621	382,822
Economic Opportunity And Development	0	0	0	0	0
Home And Community Services	1,119,700	1,092,607	1,273,658	1,326,246	1,478,438
Employee Benefits	4,334,774	4,433,857	4,601,822	4,760,491	4,767,032
Debt Service	280,701	276,243	269,309	311,214	364,697
Total Expenditures	14,012,419	13,849,639	14,690,092	15,228,078	15,797,872
Excess of Revenues Over Expenditures	359	201,685	(302,196)	(105,858)	(502,175)
OTHER FINANCING SOURCES (USES):					
Insurance recoveries	82,662	9,757	55,979	103,178	101,925
Operating Transfers - In	30,000	167,502	6,869	17,269	0
Operating Transfers - Out (b)	(191,380)	(206,638)	(177,518)	(192,830)	(188,000)
Total Other Financing Sources (Uses)	(78,718)	(29,379)	(114,670)	(72,383)	(86,075)
Excess (Deficiency) of Revenues and Other Sources Over Expenditures and Other Uses	(78,359)	172,306	(416,866)	(178,241)	(588,250)
Fund Balances - Beginning of Year	2,281,827	2,203,468	2,375,774	1,958,908	1,780,667
Fund Balances - End of Year	$ 2,203,468	$ 2,375,774	$ 1,958,908	$ 1,780,667	$ 1,192,417

The financial data presented on this page has been excerpted from the audited financial statements of the Village.

Summary presentation herein has not been audited.

Complete copies of the Village's audited financial statements are available upon request to the Village.

VILLAGE OF PELHAM
FINAL ADOPTED BUDGET FOR OPERATING FUNDS
YEAR ENDING MAY 31, 2020

	General Fund	Total Budget
ESTIMATED REVENUES:		
Real Property Taxes	$ 11,273,257	$ 11,273,257
Other Tax Items	42,000	42,000
Non-Property Tax Items (1)	1,365,000	1,365,000
Departmental Income	889,100	889,100
Use Of Money and Property	195,200	195,200
Licenses And Permits	373,000	373,000
Fines and Forfeitures	397,500	397,500
Sale Of Property and Compensation For Loss	12,000	12,000
Interfund Transfers	0	0
State Aid	270,504	270,504
Federal Aid	0	0
Miscellaneous	207,000	207,000
Intergovermental Charges	2,500	2,500
Total Estimated Revenues	15,027,061	15,027,061
APPROPRIATIONS:		
General Government Support	1,483,528	1,483,528
Public Safety	6,275,374	6,275,374
Transportation	422,416	422,416
Economic Opportunity And Assistance	0	0
Culture and Recreation	380,218	380,218
Home and Community Services	1,149,253	1,149,253
Employee Benefits	4,937,854	4,937,854
Debt Servie	523,069	523,069
Total Appropriations	15,171,712	15,171,712
Excess of Revenues Over Expenditures	(144,651)	(144,651)
OTHER FINANCING SOURCES (USES):		
Operating Transfers - In	0	0
Operating Transfers - Out	0	0
Total Other Financing Sources (Uses)	0	0
Appropriation of Fund Balance	$ 144,651	$ 144,651

(1) Includes $1,100,000 County sales tax distribution.

VILLAGE OF PELHAM
FINAL ADOPTED BUDGET FOR OPERATING FUNDS
YEAR ENDING MAY 31, 2021

	General Fund	Total Budget
ESTIMATED REVENUES:		
Real Property Taxes	$ 11,567,385	$ 11,567,385
Other Tax Items	42,000	42,000
Non-Property Tax Items (1)	1,635,000	1,635,000
Departmental Income	1,000,600	1,000,600
Use Of Money and Property	217,200	217,200
Licenses And Permits	328,000	328,000
Fines and Forfeitures	397,500	397,500
Sale Of Property and Compensation For Loss	12,000	12,000
Interfund Transfers	0	0
State Aid	193,500	193,500
Federal Aid	118,932	118,932
Miscellaneous	280,154	280,154
Intergovermental Charges	2,800	2,800
Total Estimated Revenues	15,795,071	15,795,071
APPROPRIATIONS:		
General Government Support	1,652,452	1,652,452
Public Safety	6,435,613	6,435,613
Transportation	408,955	408,955
Economic Opportunity And Assistance	0	0
Culture and Recreation	378,850	378,850
Home and Community Services	1,488,184	1,488,184
Employee Benefits	4,879,132	4,879,132
Debt Servie	551,885	551,885
Total Appropriations	15,795,071	15,795,071
Excess of Revenues Over Expenditures	0	0
OTHER FINANCING SOURCES (USES):		
Operating Transfers - In	0	0
Operating Transfers - Out	0	0
Total Other Financing Sources (Uses)	0	0
Appropriation of Fund Balance	$ 0	$ 0

(1) Includes $1,350,000 County sales tax distribution.

VILLAGE OF PELHAM
FINAL ADOPTED BUDGET FOR OPERATING FUNDS
YEAR ENDING MAY 31, 2022

	General Fund	Total Budget
ESTIMATED REVENUES:		
Real Property Taxes	$ 12,373,474	$ 12,373,474
Other Tax Items	42,000	42,000
Non-Property Tax Items (1)	1,650,000	1,650,000
Departmental Income	845,000	845,000
Use Of Money and Property	169,000	169,000
Licenses And Permits	323,000	323,000
Fines and Forfeitures	340,000	340,000
Sale Of Property and Compensation For Loss	37,000	37,000
Interfund Transfers	0	0
State Aid	187,000	187,000
Federal Aid	118,932	118,932
Miscellaneous	84,154	84,154
Intergovermental Charges	0	0
Total Estimated Revenues	16,169,560	16,169,560
APPROPRIATIONS:		
General Government Support	1,569,005	1,569,005
Public Safety	6,705,381	6,705,381
Transportation	401,857	401,857
Economic Opportunity And Assistance	0	0
Culture and Recreation	540,761	540,761
Home and Community Services	1,356,546	1,356,546
Employee Benefits	5,167,232	5,167,232
Debt Servie	428,778	428,778
Total Appropriations	16,169,560	16,169,560
Excess of Revenues Over Expenditures	0	0
OTHER FINANCING SOURCES (USES):		
Operating Transfers - In	0	0
Operating Transfers - Out	0	0
Total Other Financing Sources (Uses)	0	0
Appropriation of Fund Balance	$ 0	$ 0

(1) Includes $1,350,000 County sales tax distribution.

APPENDIX C

LINK TO INDEPENDENT AUDITORS' REPORT
FOR THE FISCAL YEAR ENDED
MAY 31, 2020

https://emma.msrb.org/P11523042.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. PKF O'Connor Davies, LLP has not been requested by the Village to further review and/or update such Financial Statements or opinion in connection with the preparation and dissemination of this Official Statement.**