

MCCALL

PARKHURST & HORTON

April 20, 2018

VIA EMAIL

Ms. Julie Kiley
First Assistant County Auditor
Williamson County
710 S. Main Street
Suite 101
Georgetown, Texas 78626

Re: S.P.J.S.T. Rest Home financing through New Hope Cultural Education Facilities Finance Corporation

Dear Ms. Kiley:

Enclosed is a request by S.P.J.S.T. Rest Home ("SPJST"), a Texas nonprofit corporation, that Williamson County consent to a project located in Williamson County to be refinanced by New Hope Cultural Education Facilities Finance Corporation (the "Issuer").

As the enclosed letter explains, the federal tax law requires that the consent of Williamson County be obtained to the financing by the Issuer. Williamson County will have no liability with respect to the proposed notes. Williamson County previously consented to the obligations that will be refinanced by these notes, and this consent resolution is substantially similar to a consent resolution adopted by the Commissioners Court of Williamson County on December 9, 2014.

The Issuer and SPJST would appreciate being placed on either the May 1 or May 8, 2018 Commissioners Court Agenda.

I will be in touch with you to answer any questions you may have.

Thank you for your assistance.

Sincerely yours,

McCall, Parkhurst & Horton L.L.P.



L. E. (Ted) Brizzolara, III

LEB:bc
Enclosures

cc: Ms. Carol Pumbo (via email)

April 20, 2018

The Honorable County Judge
and Commissioners Court of Williamson County
710 S. Main Street
Suite 101
Georgetown, Texas 78626

Re: Consent by Williamson County to financing by New Hope Cultural Education Facilities Finance Corporation for S.P.J.S.T. Rest Home

Ladies and Gentlemen:

New Hope Cultural Education Facilities Finance Corporation (the "Issuer") proposes to issue tax-exempt obligations (the "Obligations") pursuant to the Cultural Education Facilities Finance Corporation Act, Chapter 337, Texas Local Government Code, as amended (the "Act") to provide funds to finance and refinance certain health facilities for S.P.J.S.T. Rest Home ("SPJST"). The proceeds of the Obligations will be spent to refinance certain tax-exempt obligations (the "Prior Obligations") that were issued in 2015 for additional facilities at the Borrower's campus in Taylor, Texas located at 1810 Old Granger Road, 501 East Lake Drive and 505 East Lake Drive (the "Project").

SPJST is a Texas nonprofit corporation exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1986. Our firm is acting as bond counsel to the Issuer in connection with the issuance of the Obligations.

Because the Project is located in Williamson County, section 147(f) of the Internal Revenue Code of 1986, as amended (the "Code") requires that the approval of Williamson County (or the highest elected official of Williamson County) be obtained to the financing by the Issuer after the holding of a public hearing. This consent resolution is substantially similar to the consent resolution adopted by the Commissioners Court of Williamson County for SPJST on December 9, 2014 with respect to the Prior Obligations. A public hearing was held at the offices of SPJST following reasonable public notice at 9:00 a.m. on April 19, 2018 and a copy of the minutes of the public hearing is enclosed. No member of the public attended.

For your convenience, I have enclosed a proposed form of a consent resolution.

This approval is required solely for the purposes of satisfying the requirements of the Code and to enable the Issuer to proceed with the proposed refinancing of the Project with proceeds of the Obligations. This consent in no way imposes any payment or other obligations on Williamson County in connection with the financing. Williamson County will have no liability with respect to the proposed Obligations.

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Therefore, on behalf of the Issuer and SPJST we respectfully request that consideration of adoption of the enclosed consent resolution be placed on the agenda for the next available meeting of Williamson County, Texas, and that the Commissioners Court approve and adopt such resolution. Upon such approval, I would also very much appreciate if you would return three completed, originally executed and sealed certified resolutions to me in the self-addressed, stamped envelope enclosed for your convenience. Please retain one copy for your file.

Please do not hesitate to contact me at (214) 754-9233 should you have any questions or comments. Thank you very much for your cooperation and assistance.

Sincerely,

McCall, Parkhurst & Horton L.L.P.



L. E. (Ted) Brizzolara, III

LEB:bc
Enclosures

cc: Ms. Diane Volek
Mr. Cory Macdonald