



MURIEL BOWSER
MAYOR

February 8, 2024

The Honorable Phil Mendelson
Chairman
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, NW, Suite 504
Washington, DC 20001

Dear Chairman Mendelson:

Enclosed for consideration and adoption by the Council of the District of Columbia is a proposed resolution entitled "National Links Trust Inc. Revenue Bonds Project Approval Resolution of 2024" (the "Resolution").

The Resolution authorizes the issuance, sale, and delivery of tax-exempt revenue bonds, notes, or other obligations in an aggregate principal amount not to exceed \$80,000,000. These bonds will be used for the financing, refinancing, or reimbursing of costs incurred by the National Links Trust Inc. projects located at Langston Golf Course, East Potomac Golf Course, and Rock Creek Park Golf Course located in Wards 4, 5, and 6. All facilities will include new clubhouses, new driving range facilities, and new maintenance.

In accordance with Section 490 of the Home Rule Act, the bonds, when, as, and if issued, shall be without recourse to the District. The bonds shall not be general obligations of the District; shall not be a pledge of or involve the full faith and credit or the taxing power of the District; shall not constitute a debt of the District; and shall not constitute a lending of public credit for private undertakings as prohibited in section 602(a)(2) of the Home Rule Act. The bonds shall not give rise to any pecuniary liability of the District, and the District shall have no obligation with respect to the purchase of the bonds.

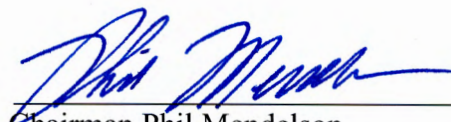
I urge the Council to take prompt and favorable action on the enclosed resolution.

Sincerely,

A handwritten signature in black ink, appearing to read "Muriel E. Bowser".

Muriel E. Bowser

Enclosures



Chairman Phil Mendelson
at the request of the Mayor

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A PROPOSED RESOLUTION

IN THE COUNCIL OF THE DISTRICT OF COLUMBIA

To authorize and provide for the issuance, sale, and delivery in an aggregate principal amount not to exceed \$80 million of District of Columbia revenue bonds in one or more series pursuant to a plan of finance and to authorize and provide for the loan of the proceeds of such bonds to assist National Links Trust Inc. in the financing, refinancing, or reimbursing of costs associated with an authorized project pursuant to section 490 of the District of Columbia Home Rule Act.

RESOLVED, BY THE COUNCIL OF THE DISTRICT OF COLUMBIA, That this resolution may be cited as the “National Links Trust Inc. Revenue Bonds Project Approval Resolution of 2024”.

Sec. 2. Definitions.

For the purpose of this resolution, the term:

(1) “Authorized Delegate” means the Mayor or the Deputy Mayor for Planning and Economic Development, or any officer or employee of the Executive Office of the Mayor to whom the Mayor has delegated or to whom the foregoing individuals have subdelegated any of the Mayor’s functions under this resolution pursuant to section 422(6) of the Home Rule Act.

(2) “Bond Counsel” means a firm or firms of attorneys designated as bond counsel from time to time by the Mayor.

30 (3) “Bonds” means the District of Columbia revenue bonds, notes, or other
31 obligations (including refunding bonds, notes, and other obligations), in one or more series,
32 authorized to be issued pursuant to this resolution.

33 (4) “Borrower” means the owner of the assets financed, refinanced, or reimbursed
34 with proceeds from the Bonds, which shall be National Links Trust Inc., a nonprofit corporation
35 organized and existing under the laws of the District of Columbia, qualified to do business in the
36 District of Columbia, and exempt from federal income taxes under 26 U.S.C Section 501(a) as an
37 organization described in 26 U.S.C. Section 501(c)(3), which is liable for the repayment of the
38 Bonds.

39 (5) “Closing Documents” means all documents and agreements, other than
40 Financing Documents, that may be necessary and appropriate to issue, sell, and deliver the
41 Bonds and to make the Loan, and includes agreements, certificates, letters, opinions, forms,
42 receipts, and other similar instruments.

43 (6) “District” means the District of Columbia.

44 (7) “Financing Documents” means the documents, other than Closing Documents,
45 that relate to the financing, refinancing or reimbursement of transactions to be effected through
46 the issuance, sale, and delivery of the Bonds and the making of the Loan, including any offering
47 document, and any required supplements to any such documents.

48 (8) “Home Rule Act” means the District of Columbia Home Rule Act, approved
49 December 24, 1973 (87 Stat. 774; D.C. Official Code § 1-201.01 *et seq.*).

50 (9) “Issuance Costs” means all fees, costs, charges, and expenses paid or incurred
51 in connection with the authorization, preparation, printing, issuance, sale, and delivery of the
52 Bonds and the making of the Loan, including, but not limited to, underwriting, legal, accounting,

53 rating agency, and all other fees, costs, charges, and expenses incurred in connection with the
54 development and implementation of the Financing Documents, the Closing Documents, and
55 those other documents necessary or appropriate in connection with the authorization,
56 preparation, printing, issuance, sale, marketing, and delivery of the Bonds and the making of the
57 Loan, together with financing fees, costs, and expenses, including program fees and
58 administrative fees charged by the District, fees paid to financial institutions and insurance
59 companies, initial letter of credit fees (if any), compensation to financial advisors and other
60 persons (other than full-time employees of the District) and entities performing services on
61 behalf of or as agents for the District.

62 (10) "Loan" means the District's lending to the Borrower of proceeds from the
63 sale, in one or more series, of the Bonds.

64 (11) "Project" means the financing, refinancing or reimbursing of the Borrower
65 for all or a portion of the Borrower's costs incurred in connection with:

66 (A) The renovation, construction, rehabilitation and equipping of three
67 existing golf course facilities, including clubhouses, maintenance facilities and driving ranges,
68 with street addresses at 6100 16th Street NW, Washington, DC, 2600 Benning Road NW,
69 Washington, DC and 972 Ohio Drive, SW, Washington, DC (collectively, the "Facilities");

70 (B) The purchase and installation of certain equipment and furnishings,
71 together with other property, real and personal, functionally related and subordinate to the
72 Facilities;

73 (C) Funding certain working capital costs, to the extent financeable relating
74 to the Bonds;

75 (D) Funding interest on the Bonds and any credit enhancement costs,
76 liquidity costs or debt service reserve fund relating to the Bonds; and

77 (E) Paying allowable Issuance Costs.

78 Sec. 3. Findings.

79 The Council finds that:

80 (a) Section 490 of the Home Rule Act provides that the Council may, by
81 resolution, authorize the issuance of District revenue bonds, notes, or other obligations
82 (including refunding bonds, notes, or other obligations) to borrow money to finance, refinance,
83 or reimburse costs, and to assist in the financing, refinancing, or reimbursing of, the costs of
84 undertakings in certain areas designated in section 490 and may effect the financing, refinancing,
85 or reimbursement by loans made directly or indirectly to any individual or legal entity, by the
86 purchase of any mortgage, note, or other security, or by the purchase, lease, or sale of any
87 property.

88 (b) The Borrower has requested the District to issue, sell, and deliver revenue
89 bonds, in one or more series, in an aggregate principal amount not to exceed \$80 million, and to
90 make the Loan for the purpose of financing, refinancing, or reimbursing costs of the Project.

91 (c) The Project is located in the District and will contribute to the health,
92 education, safety, or welfare of, or the creation or preservation of jobs for, residents of the
93 District, or to economic development of the District.

94 (d) The Project is an undertaking in the areas of sports and entertainment and
95 recreation, tourism and hospitality facilities, within the meaning of section 490 of the Home Rule
96 Act.

97 (e) The authorization, issuance, sale, and delivery of the Bonds and the Loan to
98 the Borrower are desirable, are in the public interest, will promote the purpose and intent of
99 section 490 of the Home Rule Act, and will assist the Project.

100 Sec. 4. Bond authorization.

101 (a) The Mayor is authorized pursuant to the Home Rule Act and this resolution to assist
102 in financing, refinancing or reimbursing the costs of the Project by:

103 (1) The issuance, sale, and delivery of the Bonds, in one or more series, in an
104 aggregate principal amount not to exceed \$80 million; and

105 (2) The making of the Loan.

106 (b) The Mayor is authorized to make the Loan to the Borrower for the purpose of
107 financing, refinancing or reimbursing the costs of the Project and establishing any fund with
108 respect to the Bonds as required by the Financing Documents.

109 (c) The Mayor may charge a program fee to the Borrower, including, but not limited to,
110 an amount sufficient to cover costs and expenses incurred by the District in connection with the
111 issuance, sale, and delivery of each series of the Bonds, the District's participation in the
112 monitoring of the use of the Bond proceeds and compliance with any public benefit agreements
113 with the District, and maintaining official records of each bond transaction, and assisting in the
114 redemption, repurchase, and remarketing of the Bonds.

115 (d) The Bond authorization set forth in this resolution includes the authorization to issue
116 refunding Bonds to refinance any Bonds previously issued under this resolution to finance the
117 Project; provided that the maximum principal amount of Bonds outstanding at any time does not
118 exceed the maximum principal amount of Bonds authorized hereunder.

119

120 Sec. 5. Bond details.

121 (a) The Mayor and each Authorized Delegate is authorized to take any action reasonably
122 necessary or appropriate in accordance with this resolution in connection with the preparation,
123 execution, issuance, sale, delivery, security for, and payment of the Bonds of each series,
124 including, but not limited to, determinations of:

125 (1) The final form, content, designation, and terms of the Bonds, including a
126 determination that the Bonds may be issued in certificated or book-entry form;

127 (2) The principal amount of the Bonds to be issued and denominations of the
128 Bonds;

129 (3) The rate or rates of interest or the method for determining the rate or rates of
130 interest on the Bonds;

131 (4) The date or dates of issuance, sale, and delivery of, and the payment of interest
132 on, the Bonds, and the maturity date or dates of the Bonds;

133 (5) The terms under which the Bonds may be paid, optionally or mandatorily
134 redeemed, accelerated, tendered, called, or put for redemption, repurchase, or remarketing before
135 their respective stated maturities;

136 (6) Provisions for the registration, transfer, and exchange of the Bonds and the
137 replacement of mutilated, lost, stolen, or destroyed Bonds;

138 (7) The creation of any reserve fund, sinking fund, or other fund with respect to
139 the Bonds;

140 (8) The time and place of payment of the Bonds;

141 (9) Procedures for monitoring the use of the proceeds received from the sale of
142 the Bonds to ensure that the proceeds are properly applied to the Project and used to accomplish
143 the purposes of the Home Rule Act and this resolution;

144 (10) Actions necessary to qualify the Bonds under blue sky laws of any
145 jurisdiction where the Bonds are marketed; and

146 (11) The terms and types of credit enhancement, if any, under which the Bonds
147 may be secured.

148 (b) The Bonds shall contain a legend, which shall provide that the Bonds are special
149 obligations of the District, are without recourse to the District, are not a pledge of, and do not
150 involve the faith and credit or the taxing power of the District, do not constitute a debt of the
151 District, and do not constitute lending of the public credit for private undertakings as prohibited
152 in section 602(a)(2) of the Home Rule Act.

153 (c) The Bonds shall be executed in the name of the District and on its behalf by the
154 manual or facsimile signature of the Mayor, and attested by the Secretary of the District of
155 Columbia by the Secretary of the District of Columbia's manual or facsimile signature. The
156 Mayor's execution and delivery of the Bonds shall constitute conclusive evidence of the Mayor's
157 approval, on behalf of the District, of the final form and content of the Bonds.

158 (d) The official seal of the District, or a facsimile of it, shall be impressed, printed, or
159 otherwise reproduced on the Bonds.

160 (e) The Bonds of any series may be issued in accordance with the terms of a trust
161 instrument to be entered into by the District and a trustee to be selected by the Borrower subject
162 to the approval of the Mayor, and may be subject to the terms of one or more agreements entered
163 into by the Mayor pursuant to section 490(a)(4) of the Home Rule Act.

164 (f) The Bonds may be issued at any time or from time to time in one or more issues and
165 in one or more series.

166 Sec. 6. Sale of the Bonds.

167 (a) The Bonds of any series may be sold at negotiated or competitive sale at, above, or
168 below par, to one or more persons or entities, and upon terms that the Mayor considers to be in
169 the best interest of the District.

170 (b) The Mayor or an Authorized Delegate may execute, in connection with each sale of
171 the Bonds, offering documents on behalf of the District, may deem final any such offering
172 document on behalf of the District for purposes of compliance with federal laws and regulations
173 governing such matters and may authorize the distribution of the documents in connection with
174 the sale of the Bonds.

175 (c) The Mayor is authorized to deliver the executed and sealed Bonds, on behalf of the
176 District, for authentication, and, after the Bonds have been authenticated, to deliver the Bonds to
177 the original purchasers of the Bonds upon payment of the purchase price.

178 (d) The Bonds shall not be issued until the Mayor receives an approving opinion from
179 Bond Counsel as to the validity of the Bonds of such series and, if the interest on the Bonds is
180 expected to be exempt from federal income taxation, the treatment of the interest on the Bonds
181 for purposes of federal income taxation.

182 Sec. 7. Payment and security.

183 (a) The principal of, premium, if any, and interest on, the Bonds shall be payable solely
184 from proceeds received from the sale of the Bonds, income realized from the temporary
185 investment of those proceeds, receipts and revenues realized by the District from the Loan,
186 income realized from the temporary investment of those receipts and revenues prior to payment

187 to the Bond owners, other moneys that, as provided in the Financing Documents, may be made
188 available to the District for the payment of the Bonds, and other sources of payment (other than
189 from the District), all as provided for in the Financing Documents.

190 (b) Payment of the Bonds shall be secured as provided in the Financing Documents and
191 by an assignment by the District for the benefit of the Bond owners of certain of its rights under
192 the Financing Documents and Closing Documents, including a security interest in certain
193 collateral, if any, to the trustee for the Bonds pursuant to the Financing Documents.

194 (c) The trustee is authorized to deposit, invest, and disburse the proceeds received from
195 the sale of the Bonds pursuant to the Financing Documents.

196 Sec. 8. Financing and Closing Documents.

197 (a) The Mayor is authorized to prescribe the final form and content of all Financing
198 Documents and all Closing Documents to which the District is a party that may be necessary or
199 appropriate to issue, sell, and deliver the Bonds and to make the Loan to the Borrower. Each of
200 the Financing Documents and each of the Closing Documents to which the District is not a party
201 shall be approved, as to form and content, by the Mayor.

202 (b) The Mayor is authorized to execute, in the name of the District and on its behalf, the
203 Financing Documents and any Closing Documents to which the District is a party by the
204 Mayor's manual or facsimile signature.

205 (c) If required, the official seal of the District, or a facsimile of it, shall be impressed,
206 printed, or otherwise reproduced on the Financing Documents and the Closing Documents to
207 which the District is a party.

208 (d) The Mayor's execution and delivery of the Financing Documents and the Closing
209 Documents to which the District is a party shall constitute conclusive evidence of the Mayor's

210 approval, on behalf of the District, of the final form and content of said executed Financing
211 Documents and said executed Closing Documents.

212 (e) The Mayor is authorized to deliver the executed and sealed Financing Documents and
213 Closing Documents, on behalf of the District, prior to or simultaneously with the issuance, sale,
214 and delivery of the Bonds, and to ensure the due performance of the obligations of the District
215 contained in the executed, sealed, and delivered Financing Documents and Closing Documents.

216 Sec. 9. Authorized delegation of authority.

217 To the extent permitted by District and federal laws, the Mayor may delegate to any
218 Authorized Delegate the performance of any function authorized to be performed by the Mayor
219 under this resolution.

220 Sec. 10. Limited liability.

221 (a) The Bonds shall be special obligations of the District. The Bonds shall be without
222 recourse to the District. The Bonds shall not be general obligations of the District, shall not be a
223 pledge of, or involve the faith and credit or the taxing power of, the District, shall not constitute a
224 debt of the District, and shall not constitute lending of the public credit for private undertakings
225 as prohibited in section 602(a)(2) of the Home Rule Act.

226 (b) The Bonds shall not give rise to any pecuniary liability of the District and the District
227 shall have no obligation with respect to the purchase of the Bonds.

228 (c) Nothing contained in the Bonds, in the Financing Documents, or in the Closing
229 Documents shall create an obligation on the part of the District to make payments with respect to
230 the Bonds from sources other than those listed for that purpose in section 7.

231 (d) The District shall have no liability for the payment of any Issuance Costs or for any
232 transaction or event to be effected by the Financing Documents.

233 (e) All covenants, obligations, and agreements of the District contained in this resolution,
234 the Bonds, and the executed, sealed, and delivered Financing Documents and Closing
235 Documents to which the District is a party, shall be considered to be the covenants, obligations,
236 and agreements of the District to the fullest extent authorized by law, and each of those
237 covenants, obligations, and agreements shall be binding upon the District, subject to the
238 limitations set forth in this resolution.

239 (f) No person, including, but not limited to, the Borrower and any Bond owner, shall have
240 any claims against the District or any of its elected or appointed officials, officers, employees, or
241 agents for monetary damages suffered as a result of the failure of the District or any of its elected
242 or appointed officials, officers, employees or agents to perform any covenant, undertaking, or
243 obligation under this resolution, the Bonds, the Financing Documents, or the Closing
244 Documents, or as a result of the incorrectness of any representation in or omission from the
245 Financing Documents or the Closing Documents, unless the District or its elected or appointed
246 officials, officers, employees, or agents have acted in a willful and fraudulent manner.

247 Sec. 11. District officials.

248 (a) Except as otherwise provided in section 10(f), the elected or appointed officials,
249 officers, employees, or agents of the District shall not be liable personally for the payment of the
250 Bonds or be subject to any personal liability by reason of the issuance, sale or delivery of the
251 Bonds, or for any representations, warranties, covenants, obligations, or agreements of the
252 District contained in this resolution, the Bonds, the Financing Documents, or the Closing
253 Documents.

254 (b) The signature, countersignature, facsimile signature, or facsimile countersignature of
255 any official appearing on the Bonds, the Financing Documents, or the Closing Documents shall

256 be valid and sufficient for all purposes notwithstanding the fact that the individual signatory
257 ceases to hold that office before delivery of the Bonds, the Financing Documents, or the Closing
258 Documents.

259 Sec.12. Maintenance of documents.

260 Copies of the specimen Bonds and of the final Financing Documents and Closing
261 Documents shall be filed in the Office of the Secretary of the District of Columbia.

262 Sec.13. Information reporting.

263 Within 3 days after the Mayor's receipt of the transcript of proceedings relating to the
264 issuance of the Bonds, the Mayor shall transmit a copy of the transcript to the Secretary to the
265 Council.

266 Sec. 14. Disclaimer.

267 (a) The issuance of Bonds is in the discretion of the District. Nothing contained in this
268 resolution, the Bonds, the Financing Documents, or the Closing Documents shall be construed as
269 obligating the District to issue any Bonds for the benefit of the Borrower or to participate in or
270 assist the Borrower in any way with financing, refinancing, or reimbursing the costs of the
271 Project. The Borrower shall have no claims for damages or for any other legal or equitable relief
272 against the District, its elected or appointed officials, officers, employees, or agents as a
273 consequence of any failure to issue any Bonds for the benefit of the Borrower.

274 (b) The District reserves the right to issue the Bonds in the order or priority it determines
275 in its sole and absolute discretion. The District gives no assurance and makes no representations
276 that any portion of any limited amount of bonds or other obligations, the interest on which is
277 excludable from gross income for federal income tax purposes, will be reserved or will be
278 available at the time of the proposed issuance of the Bonds.

279 (c) The District, by adopting this resolution or by taking any other action in connection
280 with financing, refinancing, or reimbursing costs of the Project, does not provide any assurance
281 that the Project is viable or sound, that the Borrower is financially sound, or that amounts owing
282 on the Bonds or pursuant to the Loan will be paid. Neither the Borrower, any purchaser of the
283 Bonds, nor any other person shall rely upon the District with respect to these matters.

284 Sec. 15. Expiration.

285 If any Bonds are not issued, sold, and delivered to the original purchaser within 3 years of
286 the date of this resolution, the authorization provided in this resolution with respect to the
287 issuance, sale, and delivery of the Bonds shall expire.

288 Sec. 16. Severability.

289 If any particular provision of this resolution or the application thereof to any person or
290 circumstance is held invalid, the remainder of this resolution and the application of such
291 provision to other persons or circumstances shall not be affected thereby. If any action or
292 inaction contemplated under this resolution is determined to be contrary to the requirements of
293 applicable law, such action or inaction shall not be necessary for the purpose of issuing of the
294 Bonds, and the validity of the Bonds shall not be adversely affected.

295 Sec. 17. Compliance with public approval requirement.

296 This approval shall constitute the approval of the Council as required in section 147(f) of
297 the Internal Revenue Code of 1986, as amended (the "Code"), and section 490(k) of the Home
298 Rule Act, for the Project to be financed, refinanced, or reimbursed with the proceeds of the
299 Bonds. This resolution approving the issuance of the Bonds for the Project has been adopted by
300 the Council after a public hearing held in accordance with section 147(f) of the Code, as such

301 section may be amended, and the corresponding regulations promulgated by the United States
302 Department of the Treasury.

303 Sec. 18. Transmittal.

304 The Council shall transmit a copy of this resolution, upon its adoption, to the Mayor.

305 Sec. 19. Fiscal impact statement.

306 The Council adopts the fiscal impact statement in the committee report as the fiscal
307 impact statement required by section 4a of the General Legislative Procedures Act of 1975,
308 approved October 16, 2006 (120 Stat. 2038; D.C. Official Code § 1-301.47a).

309 Sec. 20. Effective date.

310 This resolution shall take effect immediately.

311

National Links Trust Inc.

Revenue Bond Project

FACT SHEET

The National Links Trust Inc. has requested that the District of Columbia issue up to \$80,000,000 of 501(c)(3) revenue bonds, to support construction projects at Langston Golf Course, East Potomac Golf Course, and Rock Creek Park Golf Course located in Wards 4, 5, and 6.

The Applicant

The National Links Trust Inc., a 501(c)(3) non-profit, is dedicated to positively impacting local communities by protecting and promoting accessible and affordable municipal golf courses across the United States of America.

Proposed Project

The National Links Trust Inc. project consists of approximately \$80 million in renovations to the Langton Golf Course located at 2600 Benning Road NE, East Potomac Golf Course located at 972 Ohio Drive SW and Rock Creek Park Golf Course located at 6100 16th Street NW. All the facilities will include new clubhouses, new driving range facilities, and new maintenance facilities.

Financing Plan

A summary of the proposed sources and uses of funds is attached (see Table 1).

	Total Cost	Tax-exempt Bond Proceeds	Taxable Loan	Equity
New Construction	\$60,000,000	\$60,000,000		
Building Renovation	\$10,000,000	\$10,000,000		
Machinery Equipment	\$5,000,000	\$5,000,000		
Architecture and Engineering	\$5,000,000	\$5,000,000		

Feasibility/Structure/Security of the Bonds

A commitment letter to provide a direct pay letter of credit was included in the application from National Capital Bank, who will also serve as underwriter. The bonds will be repaid at a synthetically fixed interest rate (to be determined based on market conditions) over 25 years (with payments beginning one year after closing). A bond trustee has not yet been selected.

The bonds will be a general obligation of the National Links Trust Inc. and will be of no recourse to the District.

Public Purpose Benefits

The National Links Trust Inc. is a non-profit organization dedicated to positively impacting local communities by protecting and promoting accessible and affordable municipal golf courses across the United States of America.

The project will improve the golf courses and enhance the facilities at the three municipal courses in the District — East Potomac, Langston, and Rock Creek Park. Improving these courses and their facilities will benefit District residents who use them currently and make them more accessible to residents who do not yet use them.

Legal and Regulatory Affairs

The law firm of Orrick, Herrington, & Sutcliffe, bond counsel to the Revenue Bond Program, has preliminarily determined that the National Links Trust Inc. is a 501(c)(3) organization and that the project constitutes a permissible undertaking within the meaning of Section 490(a)(1) of the District of Columbia Home Rule Act.

The Office of Planning, Office of Tax and Revenue, Department of Employment Services, Department of Buildings have all approved the application.

Based upon the information set forth in the application, the Revenue Bond Program staff has determined that the proposed project complies with criteria for approval of a proposed financing transaction through the District's Revenue Bond Program and will assist the borrower in furthering its organizational mission.

TABLE 1
PROPOSED SOURCES AND USE OF FUNDS

SOURCES OF FUNDS	
Bond Proceeds	\$80,000,000
Total Sources of Funds	\$80,000,000
USES OF FUNDS	
New Construction	\$60,000,000
Building Renovation	\$10,000,000
Agricultural/ Engineering	\$5,000,000
Machinery/Equipment	\$5,000,000
Total Uses of Funds	\$80,000,000

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL



Commercial Division
Tax & Finance Section

MEMORANDUM

TO: William Liggins
Director, Revenue Bond Program
Office of the Deputy Mayor for Planning and Economic Development

FROM: Patrick Allen
Senior Assistant Attorney General
Commercial Division

DATE: October 25, 2023

SUBJECT: Legal Sufficiency Certification of the “National Links Trust Inc Revenue Bonds Project Approval Resolution of 2023”.

This is to certify that the Commercial Division has reviewed the above-referenced resolution and found it to be legally sufficient. If you have any questions in this regard, please do not hesitate to call me at (202) 724-7754.

Patrick Allen

Patrick Allen
Senior Assistant Attorney General