



MURIEL BOWSER  
MAYOR

May 2, 2024

The Honorable Phil Mendelson  
Chairman  
Council of the District of Columbia  
1350 Pennsylvania Avenue, N.W.  
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 "Provident Group Girard Properties Inc. Revenue Bonds Project Approval Resolution of 2024" (the "Resolution").

The Resolution authorizes the issuance, sale, and delivery in an aggregate principal amount not to exceed \$15,000,000. These bonds will be used for the financing, refinancing, or reimbursing of costs incurred by Provident Group Girard Properties Inc. for its project located at 654 Girard Street, N.W., in Ward 1.

In accordance with Section 490 of the Home Rule Act, we have determined that 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.

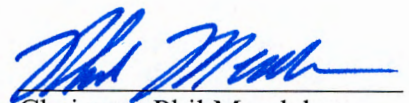
I urge the Council to take prompt and favorable action on the measure.

Sincerely,

A handwritten signature in black ink, appearing to read "Muriel Bowser", written over a white background.

Muriel E. Bowser

Enclosures

  
Chairman Phil Mendelson  
at the request of the Mayor

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 \$15 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 Provident Group Girard Properties 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 “Provident Group Girard Properties Inc. Revenue Bonds Project Approval Resolution of 2024”.

Sec. 2. Definitions.

For the purposes 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.

33 (3) "Bonds" means the District of Columbia revenue bonds, notes, or other  
34 obligations (including refunding bonds, notes, and other obligations), in one or more series,  
35 authorized to be issued pursuant to this resolution.

36 (4) "Borrower" means the owner, operator, manager and user of the assets  
37 financed, refinanced, or reimbursed with proceeds from the Bonds, which shall be Provident  
38 Group Girard Properties Inc., a nonprofit corporation organized and existing under the laws of  
39 the District of Columbia, which is exempt from federal income taxes under 26 U.S.C § 501(a) as  
40 an organization described in 26 U.S.C. § 501(c)(3) and which is liable for the repayment of the  
41 Bonds.

42 (5) "Closing Documents" means all documents and agreements, other than  
43 Financing Documents, that may be necessary and appropriate to issue, sell, and deliver the  
44 Bonds and to make the Loan contemplated thereby, and includes agreements, certificates, letters,  
45 opinions, forms, receipts, and other similar instruments.

46 (6) "District" means the District of Columbia.

47 (7) "Financing Documents" means the documents, other than Closing Documents,  
48 that relate to the financing or refinancing of transactions to be effected through the issuance, sale,  
49 and delivery of the Bonds and the making of the Loan, including any offering document, and any  
50 required supplements to any such documents.

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

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

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

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

67 (11) "Project" means the financing, refinancing or reimbursing of all or a portion  
68 of the Borrower's costs of:

69 (A) Refinancing certain existing indebtedness, the proceeds of which were  
70 used to finance the acquisition from Howard University of long term leasehold interests in an  
71 approximate 61,452 square foot multifamily residential rental building, comprising 80 rental  
72 housing units located at 654 Girard Avenue, NW, in Washington, DC (the "Facility");

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

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

77 (D) Paying allowable Issuance Costs.

78           Sec. 3. Findings.

79           The Council finds that:

80                   (1) 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                   (2) 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 \$15 million, and to  
90 make the Loan for the purpose of financing, refinancing, or reimbursing costs of the Project.

91                   (3) 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                   (4) The Project is an undertaking in the area of housing, within the meaning of  
95 section 490 of the Home Rule Act.

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

99           Sec. 4. Bond authorization.

100           (a) The Mayor is authorized pursuant to the Home Rule Act and this resolution to assist

101 in financing, refinancing or reimbursing the costs of the Project by:

102 (1) The issuance, sale, and delivery of the Bonds, in one or more series, in an  
103 aggregate principal amount not to exceed \$15 million; and

104 (2) The making of the Loan.

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

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

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

118 Sec. 5. Bond details.

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

- 123 (1) The final form, content, designation, and terms of the Bonds, including a  
124 determination that the Bonds may be issued in certificated or book-entry form;
- 125 (2) The principal amount of the Bonds to be issued and denominations of the  
126 Bonds;
- 127 (3) The rate or rates of interest or the method for determining the rate or rates of  
128 interest on the Bonds;
- 129 (4) The date or dates of issuance, sale, and delivery of, and the payment of interest  
130 on, the Bonds, and the maturity date or dates of the Bonds;
- 131 (5) The terms under which the Bonds may be paid, optionally or mandatorily  
132 redeemed, accelerated, tendered, called, or put for redemption, repurchase, or remarketing before  
133 their respective stated maturities;
- 134 (6) Provisions for the registration, transfer, and exchange of the Bonds and the  
135 replacement of mutilated, lost, stolen, or destroyed Bonds;
- 136 (7) The creation of any reserve fund, sinking fund, or other fund with respect to  
137 the Bonds;
- 138 (8) The time and place of payment of the Bonds;
- 139 (9) Procedures for monitoring the use of the proceeds received from the sale of  
140 the Bonds to ensure that the proceeds are properly applied to the Project and used to accomplish  
141 the purposes of the Home Rule Act and this resolution;
- 142 (10) Actions necessary to qualify the Bonds under blue sky laws of any  
143 jurisdiction where the Bonds are marketed; and
- 144 (11) The terms and types of credit enhancement under which the Bonds may be  
145 secured.

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

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

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

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

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

164 Sec. 6. Sale of the Bonds.

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



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

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

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

180 Sec. 7. Payment and security.

181 (a) The principal of, premium, if any, and interest on, the Bonds shall be payable solely  
182 from proceeds received from the sale of the Bonds, income realized from the temporary  
183 investment of those proceeds, receipts and revenues realized by the District from the Loan,  
184 income realized from the temporary investment of those receipts and revenues prior to payment  
185 to the Bond owners, other moneys that, as provided in the Financing Documents, may be made  
186 available to the District for the payment of the Bonds, and other sources of payment (other than  
187 from the District), all as provided for in the Financing Documents.

188 (b) Payment of the Bonds shall be secured as provided in the Financing Documents and  
189 by an assignment by the District for the benefit of the Bond owners of certain of its rights under

190 the Financing Documents and Closing Documents, including a security interest in certain  
191 collateral, if any, to the trustee for the Bonds pursuant to the Financing Documents.

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

194 Sec. 8. Financing and Closing Documents.

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

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

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

206 (d) The Mayor's execution and delivery of the Financing Documents and the Closing  
207 Documents to which the District is a party shall constitute conclusive evidence of the Mayor's  
208 approval, on behalf of the District, of the final form and content of the executed Financing  
209 Documents and the executed Closing Documents.

210 (e) The Mayor is authorized to deliver the executed and sealed Financing Documents and  
211 Closing Documents, on behalf of the District, prior to or simultaneously with the issuance, sale,

212 and delivery of the Bonds, and to ensure the due performance of the obligations of the District  
213 contained in the executed, sealed, and delivered Financing Documents and Closing Documents.

214 Sec. 9. Authorized delegation of authority.

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

218 Sec. 10. Limited liability.

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

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

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

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

231 (e) All covenants, obligations, and agreements of the District contained in this resolution,  
232 the Bonds, and the executed, sealed, and delivered Financing Documents and Closing  
233 Documents to which the District is a party, shall be considered to be the covenants, obligations,  
234 and agreements of the District to the fullest extent authorized by law, and each of those

235 covenants, obligations, and agreements shall be binding upon the District, subject to the  
236 limitations set forth in this resolution.

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

245 Sec. 11. District officials.

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

252 (b) The signature, countersignature, facsimile signature, or facsimile countersignature of  
253 any official appearing on the Bonds, the Financing Documents, or the Closing Documents shall  
254 be valid and sufficient for all purposes notwithstanding the fact that the individual signatory  
255 ceases to hold that office before delivery of the Bonds, the Financing Documents, or the Closing  
256 Documents.

257           Sec.12. Maintenance of documents.

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

260           Sec.13. Information reporting.

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

264           Sec. 14. Disclaimer.

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

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

277           (c) The District, by adopting this resolution or by taking any other action in connection  
278 with financing, refinancing, or reimbursing costs of the Project, does not provide any assurance  
279 that the Project is viable or sound, that the Borrower is financially sound, or that amounts owing

280 on the Bonds or pursuant to the Loan will be paid. Neither the Borrower, any purchaser of the  
281 Bonds, nor any other person shall rely upon the District with respect to these matters.

282           Sec. 15. Expiration.

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

286           Sec. 16. Severability.

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

293           Sec. 17. Compliance with public approval requirement.

294           This approval shall constitute the approval of the Council as required in section 147(f) of  
295 the Internal Revenue Code of 1986, as amended (Code”), and section 490(k) of the Home Rule  
296 Act, for the Project to be financed, refinanced, or reimbursed with the proceeds of the Bonds.

297 This resolution approving the issuance of the Bonds for the Project has been adopted by the  
298 Council after a public hearing held in accordance with section 147(f) of Code, as such section  
299 may be amended, and the corresponding regulations promulgated by the United States  
300 Department of the Treasury.

301           Sec. 18. Transmittal.

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

303           Sec. 19. Fiscal impact statement.

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

307           Sec. 20. Effective date.

308           This resolution shall take effect immediately.

# **Provident Group Girard Properties Inc. Revenue Bond Project**

## **FACT SHEET**

Provident Group Girard Properties Inc. has requested that the District issue up to \$15 million in tax-exempt bonds for its project located at 654 Girard Street, N.W., Washington, DC, in Ward 1.

### **The Applicant**

Provident Group Girard Properties Inc. (“Provident”) is a nonprofit corporation organized and existing under the laws of the District of Columbia.

Howard University (“Howard”) is an independent, 501(c)(3) nonprofit, coeducational, nonsectarian institution of higher education located principally on three campuses in the District of Columbia.

### **Proposed Project**

The project comprises the financing, refinancing, or reimbursing of all or a portion of Provident’s costs of:

- (A) Refinancing certain existing indebtedness, the proceeds of which were used to finance the acquisition from Howard University of leasehold interests in an approximate 61,452 square foot multifamily residential rental building, comprising 80 rental housing units, located at 654 Girard Street, N.W., in Washington, DC (the “Facility”);
- (B) Funding certain working capital costs, to the extent financeable relating to the bonds;
- (C) Funding interest on the bonds and any credit enhancement costs, liquidity costs or debt service reserve fund relating to the bonds; and
- (D) Paying allowable bond issuance costs.

### **Financing Plan**

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

### **Feasibility/Structure/Security of the Bonds**

Preston Hollow Capital, LLC, the prospective purchaser of the bonds, has deemed this transaction financially feasible based on its assessment and analysis.



### **Public Purpose Benefits**

The Project will increase options of affordable housing units in the District. Howard University is creating a model that will combine residential, student and faculty housing. The DC Revenue Bond Program can be used for affordable housing. The District's private activity volume cap is very limited. By using the DC Revenue Bond Program to help finance the project, volume cap allocation will be available for other housing projects in the District.

### **Legal and Regulatory Affairs**

Orrick, bond counsel to the DC Revenue Bond Program, has preliminarily determined that the applicant is a 501(c)(3) organization, and the project constitutes a permissible undertaking under Section 490(a)(1) of the District of Columbia Home Rule Act.

Based on the foregoing, OAG, Bond Counsel, and the IRB program have determined that the proposed project complies with criteria for approval of a proposed financing through the District's Revenue Bond Program.

**TABLE 1  
FINANCING PLAN**

<b>SOURCES</b>			
Bond Proceeds	\$15,000,000		
Equity	\$300,000		
<b>USES</b>			
	<b>Total Cost</b>	<b>Tax-Exempt Bond Proceeds</b>	<b>Equity</b>
Refinance/Refunding	\$12,960,000	\$12,960,000	
<b>Costs of Issuance:</b>			
Program Fee	\$37,500	\$37,500	
Bond Counsel Fees	\$200,000	\$100,000	\$100,000
Borrower's Counsel	\$100,000	\$50,000	\$50,000
Other Counsels' Fees	\$175,000	\$68,750	\$106,250
Underwriter/Placement Fee	\$75,000	\$37,500	\$37,500
Trustee's Fees	\$12,500	\$6,250	\$6,250
<b>Other Costs:</b>			
Net Capitalized Interest	\$450,000	\$450,000	
Debt Service Reserve Fund	\$1,290,000	\$1,290,000	
<b>Total costs:</b>	<b>\$15,300,000</b>	<b>\$15,000,000</b>	<b>\$300,000</b>

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: March 27, 2024

SUBJECT: Legal Sufficiency Certification of the "Provident Group Girard Properties  
Inc. Revenue Bonds Project Approval Resolution of 2024".

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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