CERTIFICATION OF MINUTES RELATING TO GENERAL OBLIGATION TAX ABATEMENT AND FACILITIES MAINTENANCE BONDS, SERIES 2027A,

School District: Independent School District No. 761 (Owatonna Public Schools), Minnesota

Governing Body: School Board

Kind, date, time and place of meeting: A regular meeting held on August 24, 2026 at 5:30 p.m. at the Charles S. Crandall Center, 540 West Hills Circle, Owatonna.

Members present:

Members absent:

Documents attached:

Minutes of said meeting (including):

CERTIFICATION OF MINUTES RELATING TO PROPOSED PROPERTY TAX ABATEMENT FOR PARKING LOT IMPROVEMENT PROJECTS; STATING OFFICIAL INTENT TO PROCEED WITH AND AUTHORIZING THE ISSUANCE AND SALE OF GENERAL OBLIGATION TAX ABATEMENT AND FACILITIES MAINTENANCE BONDS, SERIES 2027A, PROVIDING FOR CREDIT ENHANCEMENT WITH RESPECT THERETO

I, the undersigned, being the duly qualified and acting recording officer of the public corporation approving the abatement referred to in the title of this certificate, certify that the documents attached hereto, as described above, have been carefully compared with the original records of said corporation in my legal custody, from which they have been transcribed; that said documents are a correct and complete transcript of the minutes of a meeting of the governing body of said corporation, and correct and complete copies of all resolutions and other actions taken and of all documents approved by the governing body at said meeting, so far as they relate to said abatement; and that said meeting was duly held by the governing body at the time and place and was attended throughout by the members indicated above, pursuant to call and notice of such meeting given as required by law.

WITNESS my hand officially as such recording officer this 24th day of August, 2026.

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School District Clerk

Member ___________________ introduced the following resolution and moved its adoption, which motion was seconded by Member _____________________:

CERTIFICATION OF MINUTES RELATING TO PROPOSED PROPERTY TAX ABATEMENT FOR PARKING LOT IMPROVEMENT PROJECTS; STATING OFFICIAL INTENT TO PROCEED WITH AND AUTHORIZING THE ISSUANCE AND SALE OF GENERAL OBLIGATION TAX ABATEMENT AND FACILITIES MAINTENANCE BONDS, SERIES 2027A, PROVIDING FOR CREDIT ENHANCEMENT WITH RESPECT THERETO

BE IT RESOLVED by the School Board (the Board) of Independent School District No. 761 (Owatonna Public Schools), Minnesota (the District), as follows:

Section 1. Tax Abatement Authorization and Recitals.

1.01. The District, pursuant to Minnesota Statutes, Sections 469.1812 to 469.1815, as amended (the Act), is authorized to grant an abatement of the property taxes imposed by the District on parcels of property (the Abated Parcels) by the adoption of a resolution specifying the terms of the abatement.

1.02. The District intends to undertake parking lot improvement projects districtwide (the Improvements) and benefiting certain properties within the District boundaries identified on Exhibit A attached hereto (collectively, the Property).

1.03. The District has proposed to fund the Improvements by granting an abatement of the property taxes imposed by the District on the Property (the Proposed Property Tax Abatement).

1.04. Pursuant to the Act, this Board, on the date hereof (August 24, 2026), conducted a public hearing on the desirability of granting the Proposed Property Tax Abatement. Notice of the public hearing was duly published as required by law in the *Owatonna People's Press*, the official newspaper of the District, on August 1, 2026.

Section 2. Findings. On the basis of the information compiled by the District and elicited at the public hearing referred to in Section 1.04, it is hereby found, determined and declared:

2.01. The District expects that the benefits to the District associated with granting the Proposed Property Tax Abatement are at least equal to or exceed the associated costs to the District.

2.02. The granting of the Proposed Property Tax Abatement is in the public interest because it will fund and provide public infrastructure and help provide access to services for District residents.

2.03. The nature and extent of the public benefits which the District expects to result from the Proposed Property Tax Abatement are the Improvements which will enable District residents to continue to conveniently and safely District facilities that are regularly utilized by the public for community events.

2.04. The Property is not located in a tax increment financing district.

2.05. The granting of the Proposed Abatement will not cause the aggregate amount of abatements granted by the District under the Act to exceed, in any year, the greater of (i) ten percent (10%) of the District's net tax capacity for the taxes payable year to which the abatement applies, or (ii) $200,000.

2.06. It is in the best interests of the District to grant the tax abatement authorized in this resolution.

2.07. Under Section 469.1813, subdivision 9 of the Act, it is not necessary for the District to obtain the consent of any owner of the Property to grant an abatement.

Section 3. Granting of Tax Abatement.

3.01. A property tax abatement (the Abatement) is hereby granted in respect of property taxes levied by the District on the Property for fifteen (15) years. The total Abatement amount is not expected to exceed $2,410,750 over fifteen (15) years.

3.02. The District shall retain the Abatement and apply it to payment of all or a portion of the costs of acquiring or constructing the Improvements.

3.03. The Abatement may be modified or terminated at any time by the Board in accordance with the Act.

Section 4. Bond Authorization; Approval of Facilities Maintenance Plan.

4.01. The District is authorized, pursuant to the Act and Minnesota Statutes, Chapter 475 and Section 123B.595, to borrow money by the issuance of its general obligation tax abatement bonds and general obligation facilities maintenance bonds.

4.02. This Board hereby determines it necessary and desirable and in the best interest of the District to issue its General Obligation Tax Abatement and Facilities Maintenance Bonds, Series 2027A (the Bonds), to finance:

(a) the Improvements; and

(b) certain deferred capital maintenance projects at District facilities (the Facilities Maintenance Projects, and together with the Improvements, the Project) as described in the District's ten-year facility plan for Fiscal Year 2028 (the Facility Plan) hereby approved by this Board. Pursuant to the provisions of Minnesota Statutes, Section 123B.595, subdivision 5 it is hereby determined that the total amount of District indebtedness as of August 13, 2026, is $146,750,000.

4.03. The Bonds shall be issued in the approximate principal amount of $3,610,000. The portion of the Bonds being issued pursuant to the Act and Chapter 475 to finance the Improvements shall be issued in the approximate principal amount of $1,700,000 (the Abatement Bonds), and the portion of the Bonds being issued pursuant to Section 123B.595 and Chapter 475 to finance the

Facilities Maintenance Projects shall be issued in the approximate principal amount of $1,910,000 (the Facilities Maintenance Bonds).

Section 5. Approval by Commission of Education of the State of Minnesota; Notice Publication.

(a) The Facility Plan will be submitted to the Commissioner of the Department of Education of the State of Minnesota (the Commissioner) for approval as required by Minnesota Statutes, Section 123B.595, subdivision 5 and such approval will be received prior to the date on which the Bonds are issued.

(b) The Clerk is authorized and directed to cause notice of the intended projects, the amount of the facilities maintenance bonds to be issued, and the total amount of the District's indebtedness to be published in a legal newspaper of general circulation in the District.

Section 6. Sale. The District has retained Ehlers & Associates, Inc., in Minneapolis, Minnesota (Ehlers) as its independent municipal advisor in connection with the sale of the Bonds. Ehlers is authorized to solicit proposals for the purchase of the Bonds in accordance with Minnesota Statutes, Section 475.60, subdivision 2, paragraph (9). The Board shall meet at the time and place specified in the Official Statement for the Bonds, or such other time as is deemed appropriate by the District in consultation with Ehlers, to receive and consider such proposals for the purchase of the Bonds.

Section 7. Official Statement; Proposals. Ehlers is authorized to prepare and distribute, for the District, a preliminary Official Statement and an Official Statement relating to the sale of the Bonds, and Ehlers and the underwriter are each hereby authorized to use a final Official Statement substantially in the form of said Preliminary Official Statement but with such changes therein as are required to conform the same to the terms of the Bonds, and the chair, clerk, superintendent or director of finance and operations in consultation with and upon the advice of representatives of Ehlers and bond counsel, are hereby authorized and directed to finalize and approve such Official Statement and execute and deliver such certifications and to take such steps as are necessary to comply with SEC Rule 15c2-12. Ehlers is additionally authorized to open, read, and tabulate the proposals for presentation to the Board.

Section 8. State Credit Enhancement Program. (a) The District hereby covenants and obligates itself to notify the Commissioner of a potential default in the payment of principal and interest on the Bonds and to use the provisions of Minnesota Statutes, Section 126C.55 to guarantee payment of the principal and interest on the Bonds when due. The District further covenants to deposit with the Registrar or any successor paying agent three (3) days prior to the date on which a payment is due an amount sufficient to make that payment or to notify the Commissioner that it will be unable to make all or a portion of that payment. The Registrar for the Bonds is authorized and directed to notify the Commissioner if it becomes aware of a potential default in the payment of principal or interest on the Bonds or if, on the day two (2) business days prior to the date a payment is due on the Bonds, there are insufficient funds to make that payment on deposit with the Registrar. The District understands that as a result of its covenant to be bound by the provision of Minnesota Statutes, Section 126C.55, the provisions of that section shall be binding as long as any Bonds of this issue remain outstanding.

(b) The District further covenants to comply with all procedures now and hereafter established by the Departments of Management and Budget and Education of the State of Minnesota pursuant to Minnesota Statutes, Section 126C.55, subdivision 2(c) and otherwise to take such actions as necessary to comply with that section. The chair, clerk, superintendent or director of finance and operations is authorized to execute any applicable Minnesota Department of Education forms.

Section 9. REIMBURSEMENT.

(a) (i) The Internal Revenue Service has issued Section 1.150-2 of the Income Tax Regulations (the Regulations) dealing with the issuance of tax-exempt obligations all or a portion of the proceeds of which are to be used to reimburse the District for Project expenditures made by the District prior to the date of issuance (the Reimbursement Obligations).

(ii) The Regulations generally require that the District make a declaration of its official intent to reimburse itself for such prior expenditures out of the proceeds of a subsequently issued series of tax-exempt obligations within 60 days after payment of the expenditures, that such obligations be issued and the reimbursement allocation be made from the proceeds of such obligations within the reimbursement period (as defined in the Regulations), and that the expenditures reimbursed be capital expenditures or costs of issuance of the obligations.

(iii) The District desires to comply with requirements of the Regulations with respect to the Project.

(b) (i) The District proposes to undertake the Project and to make original expenditures with respect thereto prior to the issuance of Reimbursement Obligations, and reasonably expects to issue Reimbursement Obligations for such project in the maximum principal amounts shown below:

Project	**Maximum Amount of Obligations Expected to be Issued for the Project**
Parking lot improvement projects districtwide.	$1,700,000
Deferred capital maintenance projects at District facilities.	$1,910,000

(ii) Other than (i) de minimis amounts permitted to be reimbursed pursuant to Section 1.150-2(f)(1) of the Regulations or (ii) expenditures constituting preliminary expenditures as defined in Section 1.150-2(f)(2) of the Regulations, the District will not seek reimbursement for any original expenditures with respect to the foregoing Project paid more than 60 days prior to the date of adoption of this resolution. All original expenditures for which reimbursement is sought will be capital expenditures or costs of issuance of the Reimbursement Obligations.

(c) As of the date hereof, there are no District funds reserved, pledged, allocated on a long term basis or otherwise set aside (or reasonably expected to be reserved, pledged, allocated on a long term basis or otherwise set aside) to provide permanent financing for the original expenditures related to the Project other than pursuant to the issuance of the Reimbursement Obligations. Consequently, it is not expected that the issuance of the Reimbursement Obligations will result in the creation of any replacement proceeds.

(d) The District's director of finance and operations shall be responsible for making the “reimbursement allocations” described in the Regulations, being generally the transfer of the appropriate amount of proceeds of the Reimbursement Obligations to reimburse the source of temporary financing used by the District to make payment of the original expenditures relating to the Project. Each reimbursement allocation shall be made not later than (i) eighteen (18) months after the date of the original expenditure or (ii) eighteen (18) months after the date the Project is placed in service or abandoned (but in no event later than three (3) years after the original expenditure is paid) and shall be evidenced by an entry on the official books and records of the District maintained for the Reimbursement Obligations and shall specifically identify the original expenditures being reimbursed

Upon vote being taken thereon, the following voted in favor thereof:

and the following voted against the same:

whereupon the resolution was declared duly passed and adopted.

<u>**EXHIBIT A**</u>

<u>Abated Parcels</u>

17-633-0101
17-529-0101