FEDERAL TAX COMPLIANCE QUESTIONNAIRE

If a TAN does not qualify for an exception from arbitrage rebate (either the small issue exception or one of the two six month spending exceptions), the issuing School Distrimay be liable for arbitrage rebate with respect to the TAN.
The undersigned acknowledges that the School District has adopted certain writted procedures regarding post-issuance compliance with respect to the School District's tax exempt obligations (including the TAN). The undersigned acknowledges that, if the School District is not a small issuer, those post-issuance compliance procedures provide that the School District will take steps (such as the appointment of a rebate advisor) determine whether the School District has an arbitrage rebate liability with respect to the TAN and, if so, to pay the arbitrage rebate liability to the U.S. Treasury.

** If you have any questions regarding this Federal Tax Compliance Questionnaire, please contact Frannie Heizer at (803) 753-3338 or fheizer@burr.com or Mike Burns at (864) 271-4940 or mburns@burr.com.