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June 8, 2020

**VIA HAND DELIVERY:**

Mayor Jerry L. Demings  
-AND-  
Orange County Board of County Commissioners  
Orange County Administration Center  
201 S. Rosalind Avenue, 5th Floor  
Orlando, Florida 32801

**Re: RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ORANGE COUNTY, FLORIDA, APPROVING, SOLELY FOR THE PURPOSES OF SECTION 147(f) OF THE INTERNAL REVENUE CODE OF 1986, AS AMENDED, THE ISSUANCE BY THE ST. JOHNS COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY OF ITS REVENUE BONDS (PRESBYTERIAN RETIREMENT COMMUNITIES OBLIGATED GROUP PROJECT), SERIES 2020; PROVIDING FOR CERTAIN OTHER MATTERS IN CONNECTION THEREWITH; AND PROVIDING AN EFFECTIVE DATE.**

Dear Mayor Demings:

The Orange County Health Facilities Authority (the "Authority") respectfully requests that the Board of County Commissioners approve a resolution regarding the issuance of tax exempt revenue bonds for the benefit of of Presbyterian Retirement Communities, Inc., Palm Shores Retirement Community, Inc., Suncoast Manor Retirement Community, Inc., Wesley Manor, Inc., Westminster Retirement Communities Foundation, Inc., Westminster Services, Inc. and Westminster Shores, Inc. ("Presbyterian Retirement Communities Obligated Group"), solely for the purpose of Section 147 of the Internal Revenue Code and other applicable provisions of law.

The proceeds of the Bonds will be used to (i) rehabilitating and equipping an approximately 14,000 square foot office building occupied by Westminster Services, Inc. to manage the operations of Presbyterian Retirement Communities and its affiliates, (ii) renovating and equipping 48 residential apartments in the Towers units of Westminster Winter Park to include kitchens, and constructing and equipping 40 residential apartments and an auditorium and enclosing a parking lot under the skilled nursing facility building and (iii) creating more private rooms at Westminster Towers Orlando as well as (iv) refunding the St. Johns County Industrial Development Authority Revenue Bonds (Presbyterian



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Retirement Communities Project), Series 2010B which financed the constructing and equipping of 54 residential apartments and a parking deck at Westminster Winter Park.

As you are probably aware, approval by the Board of a bond issue involving an Orange County project is required by the Internal Revenue Code of 1986, as amended.

A copy of the Resolution has been sent to Lila McHenry in the Orange County Attorney's Office for review.

The public hearing that is required by TEFRA for these Bonds will be held Wednesday, June 10, 2020. A copy of the TEFRA Minutes of that public hearing will be provided thereafter.

**ACTION REQUESTED: APPROVAL AND EXECUTION OF RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ORANGE COUNTY, FLORIDA, APPROVING, SOLELY FOR THE PURPOSES OF SECTION 147(f) OF THE INTERNAL REVENUE CODE OF 1986, AS AMENDED, THE ISSUANCE BY THE ST. JOHNS COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY OF ITS REVENUE BONDS (PRESBYTERIAN RETIREMENT COMMUNITIES OBLIGATED GROUP PROJECT), SERIES 2020; PROVIDING FOR CERTAIN OTHER MATTERS IN CONNECTION THEREWITH; AND PROVIDING AN EFFECTIVE DATE.**

If you have any questions regarding this matter, please feel free to contact me at your convenience.

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Yours very truly,



Michael A. Ryan, Attorney for Orange County  
Health Facilities Authority

Enclosures:

1. Proposed Resolution for adoption by the Board of County Commissioners at the June 23, 2020 meeting, together with Exhibit A – Publisher’s Affidavit; Exhibit B – TEFRA Minutes to be provided after TEFRA hearing.

cc: Byron W. Brooks, AICP Orange County Administrator (w/o encl.)  
Randy Singh, Deputy County Administrator (w/o encl.)  
Cheryl J. Gillespie, Agenda Development Supervisor (w/encl.)  
Leonard H. Habas, Chairman, OCHFA (via e-mail, w/encl.)  
Robert Szafranski, Vice Chairman, OCHFA (via e-mail, w/encl.)  
Lila McHenry, Assistant County Attorney (w/encl.)  
Fred Winterkamp, Manager, Fiscal and Business Services (w/encl.)  
Irvin Weinstein, Esquire (via e-mail, w/encl.)  
Phil Diamond, Comptroller (via e-mail, w/encl.)