PRELIMINARY OFFICIAL STATEMENT DATED MARCH 12, 2018

SERIAL BONDS **Rating: See "Rating" herein**

In the opinion of Hodgson Russ LLP, of Buffalo, New York, Bond Counsel, under existing statutes, regulations, rulings, and court decisions, and assuming continuing compliance with certain tax certifications described herein, interest on the Bonds is excluded from gross income for federal income tax purposes under section 103 of the Internal Revenue Code of 1986 (the "Code"), as amended. Bond Counsel is also of the opinion that the interest on the Bonds is not treated as an item of tax preference for the purpose of the federal alternative minimum tax imposed on individuals. Furthermore, Bond Counsel is of the opinion that, under existing statutes, interest on the Bonds is exempt from personal income taxes imposed by New York State and any political subdivision thereof. See "TAX EXEMPTION" herein.

The Bonds ***will NOT be*** *designated by the District as "qualified tax-exempt obligations" pursuant to Section 265(b)(3) of the Code.*

ORCHARD PARK CENTRAL SCHOOL DISTRICT
ERIE COUNTY, NEW YORK
(the "District")

$21,840,000
SCHOOL DISTRICT SERIAL BONDS, 2018
(the "Bonds")

Date of Issue: April 5, 2018 **Maturity Dates:** April 1, 2019-32

The Bonds are general obligations of the District, and will contain a pledge of the faith and credit of the District for the payment of the principal of and interest on the Bonds and, unless paid from other sources, the Bonds are payable from *ad valorem* taxes which may be levied upon all the taxable real property within the District, without limitation as to rate or amount (subject to certain statutory limitations imposed by Chapter 97 of the 2011 Laws of New York [the "Tax Levy Limitation Law"]; see "TAX INFORMATION--Tax Levy Limitation Law," herein).

The Bonds will be issued as registered bonds registered to the Depository Trust Company ("DTC" or the "Securities Depository").

The Bonds will be issued through DTC and registered in the name of Cede & Co., as nominee of DTC in New York, New York, which will act as securities depository for the Bonds. Individual purchases will be made in book-entry-only form, in the principal amount of $5,000 or integral multiples thereof. Purchasers of the Bonds will not receive certificates representing their ownership interest in the Bonds. Payments of principal of and interest on the Bonds will be made by the District to DTC, which will in turn remit such principal and interest to its Participants, for subsequent distribution to the Beneficial Owners of the Bonds.

The Bonds are dated their date of delivery and will bear interest from that date at the annual rate or rates as specified by the purchaser of the Bonds, payable on April 1, 2019, October 1, 2019, and semi-annually thereafter on each April 1 and October 1 until maturity (or earlier redemption). The Bonds will mature on April 1 of each year until maturity, as shown on the inside cover page hereof. Certain of the Bonds are subject to optional redemption as described herein (See "THE BONDS – Optional Redemption for the Bonds" herein.

The Bonds are offered when, as, and if issued by the District and accepted by the purchaser, subject to the final approving opinion of Hodgson Russ LLP, of Buffalo, New York, Bond Counsel, and certain other conditions. Capital Markets Advisors, LLC has served as Municipal Advisor to the District in connection with the issuance of the Bonds. It is expected that delivery of the Bonds in book-entry form will be made on or about April 5, 2018 (the "Delivery Date").

THE DISTRICT DEEMS THIS OFFICIAL STATEMENT TO BE FINAL FOR PURPOSES OF SECURITIES AND EXCHANGE COMMISSION RULE 15c2-12 (THE "RULE"), EXCEPT FOR CERTAIN INFORMATION THAT HAS BEEN OMITTED HEREFROM IN ACCORDANCE WITH THE RULE AND THAT WILL BE SUPPLIED WHEN THIS OFFICIAL STATEMENT IS UPDATED FOLLOWING THE SALE OF THE BONDS. THIS OFFICIAL STATEMENT WILL BE SO UPDATED UPON REQUEST OF THE SUCCESSFUL BIDDER AS MORE FULLY DESCRIBED IN THE NOTICE OF BOND SALE WITH RESPECT TO THE BONDS. FOR A DESCRIPTION OF THE DISTRICT'S AGREEMENT TO PROVIDE, UNDER CERTAIN CIRCUMSTANCES, CONTINUING DISCLOSURE PURSUANT TO THE RULE, SEE "DISCLOSURE UNDERTAKING," HEREIN.

Dated: March 12, 2018

The Bonds will mature on April 1 in each of the following years as set forth below.

Year	Amount***	Interest Rate	Yield	CUSIP*	Year**	Amount***	Interest Rate	Yield	CUSIP*
2019	$1,355,000				2026	$1,560,000			
2020	1,375,000				2027**	1,600,000			
2021	1,400,000				2028**	1,640,000			
2022	1,425,000				2029**	1,685,000			
2023	1,455,000				2030**	1,730,000			
2024	1,485,000				2031**	1,780,000			
2025	1,520,000				2032**	1,830,000			

* CUSIP numbers have been assigned by an independent company not affiliated with the District and are included solely for the convenience of the holders of the Bonds. The District is not responsible for the selection or uses of these CUSIP numbers and no representation is made to their correctness on the Bonds or as indicated above.

** The Bonds maturing in the year 2027 and thereafter will be subject to optional redemption prior to maturity, as described herein. See "THE BONDS-Optional Redemption for the Bonds" herein.

*** The principal maturities of the Bonds are subject to adjustment following their sale to achieve level debt compliance, pursuant to the terms of the accompanying Notice of Bond Sale.

ORCHARD PARK CENTRAL SCHOOL DISTRICT
ERIE COUNTY, NEW YORK

BOARD OF EDUCATION

BOND COUNSEL

HODGSON RUSS LLP
Buffalo, New York

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC
Hudson Valley * Long Island * Southern Tier * Western New York
(716) 662-3910

No dealer, broker, salesman or other person has been authorized by the District or the Municipal Advisor to give any information or to make any representations other than those contained in this Official Statement and, if given or made, such information or representations must not be relied upon as having been authorized by the foregoing. This Official Statement does not constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of the Bonds by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale. The information set forth herein has been obtained from the District from sources which are believed to be reliable, but it is not to be guaranteed as to accuracy or completeness. The information and expressions of opinion herein are subject to change without notice, and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in the affairs of the District since the date hereof.

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APPENDIX A

OFFICIAL STATEMENT
RELATING TO THE ISSUANCE OF

ORCHARD PARK CENTRAL SCHOOL DISTRICT
ERIE COUNTY, NEW YORK

$21,840,000
SCHOOL DISTRICT SERIAL BONDS, 2018
(the "Bonds")

This Official Statement (the "Official Statement"), which includes the cover page and appendices hereto, presents certain information relating to the Orchard Park Central School District, Erie County, New York (the "District," "County" and "State," respectively), in connection with the sale of the District's $21,840,000 School District Serial Bonds, 2018 (the "Bonds").

All quotations from and summaries and explanations of provisions of the Constitution and Laws of the State and acts and proceedings of the District contained herein do not purport to be complete and are qualified in their entirety by reference to the official compilations thereof, and all references to the Bonds and the proceedings of the District relating thereto are qualified in their entirety by reference to the definitive form of the Bonds and such proceedings.

THE BONDS

Description of the Bonds

The Bonds will be issued as registered bonds registered to the Depository Trust Company ("DTC" or the "Securities Depository").

The Bonds will be issued through DTC and registered in the name of Cede & Co., as nominee of DTC in New York, New York, which will act as Securities Depository for the Bonds. Individual purchases will be made in book-entry-only form, in the principal amount of $5,000 or integral multiples thereof. Purchasers of the Bonds will not receive certificates representing their ownership interest in the Bonds. Payments of principal of and interest on the Bonds will be made by the District to DTC, which will in turn remit such principal and interest to its Participants, for subsequent distribution to the Beneficial Owners of the Bonds.

The Bonds are dated their date of delivery and will bear interest from that date until maturity at the annual rate or rates as specified by the purchaser of the Bonds, payable on April 1, 2019, October 1, 2019 and semi-annually thereafter on each April 1 and October 1 until maturity (or earlier redemption). The Bonds will mature annually on April 1, as shown on the inside cover page hereof.

The record date of the Bonds will be the fifteenth day of the calendar month preceding each respective interest payment date.

Authority for and Purpose of the Bonds

The Bonds are authorized to be issued pursuant to the Constitution and laws of the State, including the Education Law and the Local Finance Law, and pursuant to two bond resolutions that were duly adopted by the Board of Education of the District (the "Board") on December 9, 2014 (following the approval of two propositions by the qualified voters of the District on December 1, 2014) authorizing the issuance of serial bonds in an amount not to exceed (A) $20,839,874 for the financing of the reconstruction and renovation of, and the construction of improvements and upgrades to, various District buildings and facilities (and the sites thereof) and (B) $1,800,000 for the financing of the Middle School auditorium renovation project.

Proceeds of the Bonds, along with $799,874 of budgetary appropriations, will be used to redeem and retire, in full, the $22,639,874 bond anticipation note of the District maturing on April 6, 2018.

Optional Redemption for the Bonds

The Bonds maturing on or before April 1, 2026 will not be subject to redemption prior to maturity.

The Bonds maturing on or after April 1, 2027 will be subject to redemption prior to maturity, at the option of the District, on any date on or after April 1, 2026, in whole or in part, and if in part in any order of their maturity and in any amount within a maturity, at the redemption price of 100% of the par amount of the Bonds to be redeemed, plus accrued interest to the date of redemption.

The District may select the maturities of the Bonds to be redeemed and the amount to be redeemed of each maturity selected, as the District shall determine to be in the best interest of the District at the time of such redemption. If less than all of the Bonds of any maturity are to be redeemed prior to maturity, the particular Bonds of such maturity to be redeemed shall be selected by the District at random (by lot or in any other customary manner of selection as determined by the District). Notice of such call for redemption shall be given by mailing such notice to the registered owner(s) of the Bonds to be redeemed not more than sixty (60) days nor less than thirty (30) days prior to the designated redemption date. Notice of redemption having been given as aforesaid, the Bonds so called for redemption shall, on the date of redemption set forth in such call notice, become due and payable, together with accrued interest to such redemption date, and interest shall cease to be paid thereon after such redemption date.

The District may provide conditional notice of redemption, which may state that such redemption is conditioned upon the receipt of moneys and/or any other event. If any such condition is not satisfied, such redemption shall not occur, and the District is to give notice thereof, as soon as practicable, in the same manner, to the same person(s), as notice of such redemption was given as described above. Additionally, any such redemption notice may be rescinded by the District no later than one business day prior to the date specified for redemption, by written notice by the District given in the same manner, to the same person(s), as notice of such redemption was given.

Nature of Obligation

The Bonds, when duly issued and paid for, will constitute a contract between the District and the holders thereof.

The Bonds will be general obligations of the District and will contain a pledge of the faith and credit of the District for the payment of the principal thereof and the interest thereon. For the payment of such principal and interest, unless paid from other sources or charges, the District has the power and statutory authorization to levy *ad valorem* taxes on all taxable real property in the District, without limitation as to rate or amount (subject to certain statutory limitations imposed by the Tax Levy Limitation Law); see "TAX INFORMATION-Tax Levy Limitation Law," herein.

Under the Constitution of the State, the District is required to pledge its faith and credit for the payment of the principal of and interest on the Bonds, and the State is specifically precluded from restricting the power of the District to levy taxes on real estate therefor. On June 24, 2011, the Tax Levy Limitation Law was adopted in the State. The Tax Levy Limitation Law established certain limitations on the power of local governments and school districts to increase the property tax levy beyond certain prescribed limits (without following certain prescribed procedures). Attempts to challenge the constitutionality of the Tax Levy Limitation Law through the courts have so far been unsuccessful. The Tax Levy Limitation Law had its first application with respect to the District's budget for fiscal year 2012-13. The Tax Levy Limitation Law does make certain allowances for the exclusion of tax levy increases associated with capital expenses by school districts. See "TAX INFORMATION-Tax Levy Limitation Law," herein. Also, certain special protective procedures and remedies available to holders of school district debt remain in place and are not affected by the Tax Levy Limitation Law. See “DISTRICT INDEBTEDNESS—Remedies Upon Default,” herein.

Book-Entry-Only System

The Bonds will be issued as book-entry Bonds. In such scenario, DTC will act as securities depository for the Bonds. The Bonds will be issued as fully-registered bonds registered in the name of Cede & Co. (DTC’s partnership nominee) or such other name as may be requested by an authorized representative of DTC. One fully-registered bond certificate will be issued for each maturity of the Bonds and will be deposited with DTC. DTC, the world’s largest depository, is a limited-purpose trust company organized under the New York Banking Law, a “banking organization” within the meaning of the New York Banking Law, a member of the Federal Reserve System, a “clearing corporation” within the meaning of the New York Uniform Commercial Code, and a “clearing agency” registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC’s participants (“Direct Participants”) deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants’ accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations. DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation (“DTCC”). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies. DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly (“Indirect Participants”). The DTC Rules applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at www.dtcc.com and www.dtc.org.

Purchases of the Bonds under the DTC system must be made by or through Direct Participants, which will receive a credit for the Bonds on DTC’s records. The ownership interest of each actual purchaser of each Bond (“Beneficial Owner”) is in turn to be recorded on the Direct and Indirect Participants’ records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the Bonds are to be accomplished by entries made on the books of Direct and Indirect Participants acting on behalf of Beneficial Owners. Beneficial Owners will not receive certificates representing their ownership interests in the Bonds, except in the event that use of the book-entry system for the Bonds is discontinued.

To facilitate subsequent transfers, all the Bonds deposited by Direct Participants with DTC are registered in the name of DTC’s partnership nominee, Cede & Co., or such other name as may be requested by an authorized representative of DTC. The deposit of the Bonds with DTC and their registration in the name of Cede & Co. or such other DTC nominee do not affect any change in beneficial ownership. DTC has no knowledge of the actual Beneficial Owners of the Bonds; DTC’s records reflect only the identity of the Direct Participants to whose accounts such Bonds are credited, which may or may not be the Beneficial Owners. The Direct and Indirect Participants will remain responsible for keeping account of their holdings on behalf of their customers.

Conveyance of notices and other communications by DTC to Direct Participants, by Direct Participants to Indirect Participants, and by Direct Participants and Indirect Participants to Beneficial Owners will be governed by arrangements among them, subject to any statutory or regulatory requirements as may be in effect from time to time. Redemption notices shall be sent to DTC. If less than all of the securities within an issue are being redeemed, DTC’s practice is to determine by lot the amount of the interest of each Direct Participant in such issue to be redeemed.

Neither DTC nor Cede & Co. (nor any other DTC nominee) will consent or vote with respect to the Bonds unless authorized by a Direct Participant in accordance with DTC's MMI Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the District as soon as possible after the record date. The Omnibus Proxy assigns Cede & Co.'s consenting or voting rights to those Direct Participants to whose accounts the Bonds are credited on the record date (identified in a listing attached to the Omnibus Proxy).

Principal and interest payments on the Bonds will be made to Cede & Co., or such other nominee as may be requested by an authorized representative of DTC. DTC's practice is to credit Direct Participants' accounts upon DTC's receipt of funds and corresponding detail information from the District, on payable date in accordance with their respective holdings shown on DTC's records. Payments by Participants to Beneficial Owners will be governed by standing instructions and customary practices, as is the case with securities held for the accounts of customers in bearer form or registered in "street name," and will be the responsibility of such Participant and not of DTC or the District, subject to any statutory or regulatory requirements as may be in effect from time to time.

Payment of principal and interest payments to Cede & Co. (or such other nominee as may be requested by an authorized representative of DTC) is the responsibility of the District, disbursement of such payments to Direct Participants will be the responsibility of DTC, and disbursement of such payments to the Beneficial Owners will be the responsibility of Direct and Indirect Participants.

DTC may discontinue providing its services as depository with respect to the Bonds at any time by giving reasonable notice to the District. Under such circumstances, in the event that a successor depository is not obtained, bond certificates are required to be printed and delivered.

The District may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, bond certificates will be printed and delivered to DTC.

The information in this section concerning DTC and DTC's book-entry system has been obtained from sources that the District believes to be reliable, but the District takes no responsibility for the accuracy thereof.

THE DISTRICT CANNOT AND DOES NOT GIVE ANY ASSURANCE THAT DTC DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC WILL DISTRIBUTE TO THE BENEFICIAL OWNERS OF THE BONDS: (1) PAYMENTS OF PRINCIPAL OF OR INTEREST OR REDEMPTION PREMIUM ON THE BONDS; (2) CONFIRMATIONS OF THEIR OWNERSHIP INTERESTS IN THE BONDS; OR (3) OTHER NOTICES SENT TO DTC OR CEDE & CO., ITS PARTNERSHIP NOMINEE, AS THE REGISTERED OWNER OF THE BONDS, OR THAT THEY WILL DO SO ON A TIMELY BASIS, OR THAT DTC, DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS WILL SERVE AND ACT IN THE MANNER DESCRIBED IN THIS OFFICIAL STATEMENT.

THE DISTRICT WILL NOT HAVE ANY RESPONSIBILITY OR OBLIGATION TO DTC, THE DIRECT PARTICIPANTS, THE INDIRECT PARTICIPANTS OF DTC OR THE BENEFICIAL OWNERS WITH RESPECT TO: (1) THE ACCURACY OF ANY RECORDS MAINTAINED BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC; (2) THE PAYMENT BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC OF ANY AMOUNT DUE TO ANY BENEFICIAL OWNER IN RESPECT OF THE PRINCIPAL AMOUNT OF OR INTEREST OR REDEMPTION PREMIUM ON THE BONDS; (3) THE DELIVERY BY DTC OR ANY DIRECT PARTICIPANTS OR INDIRECT PARTICIPANTS OF DTC OF ANY NOTICE TO ANY BENEFICIAL OWNER THAT IS REQUIRED OR PERMITTED TO BE GIVEN TO OWNERS; OR (4) ANY CONSENT GIVEN OR OTHER ACTION TAKEN BY DTC AS THE REGISTERED HOLDER OF THE BONDS.

THE INFORMATION CONTAINED HEREIN CONCERNING DTC AND ITS BOOK-ENTRY SYSTEM HAS BEEN OBTAINED FROM DTC AND THE DISTRICT MAKES NO

REPRESENTATION AS TO THE COMPLETENESS OR THE ACCURACY OF SUCH INFORMATION OR AS TO THE ABSENCE OF MATERIAL ADVERSE CHANGES IN SUCH INFORMATION SUBSEQUENT TO THE DATE HEREOF.

Source: The Depository Trust Company.

MARKET FACTORS

The financial condition of the District as well as the market for the Bonds could be affected by a variety of factors, some of which are beyond the District's control. There can be no assurance that adverse events in the State, including, for example, the seeking by a municipality of remedies pursuant to the Federal Bankruptcy Act or otherwise, will not occur which might affect the market price of and the market for the Bonds. If a significant default or other financial crisis should occur in the affairs of the State or at any of its agencies or political subdivisions thereby further impairing the acceptability of obligations issued by borrowers within the State, both the ability of the District to arrange for additional borrowings and the market for and market value of outstanding debt obligations, including the Bonds, could be adversely affected.

The District is dependent to a modest degree on financial assistance from the State in the form of State aid. No delay in payment of State aid for the remainder of the District's current fiscal year is presently anticipated although no assurance can be given that there will not be a delay in payment thereof. If the State should experience difficulty in borrowing funds in anticipation of the receipt of State taxes in order to pay State aid to municipalities and school districts in the State, including the District, in this year or future years, the District may be affected by such a delay, until sufficient State taxes have been received by the State to make State aid payments to the District.

Should the District fail to receive moneys expected from the State in the amounts and at the times expected, the District is authorized by the Local Finance Law to provide operating funds by borrowing in anticipation of the receipt of uncollected State aid.

The market for the Bonds could also be affected if the Internal Revenue Code of 1986, as amended (the "Code") were to be amended to reduce or eliminate the favorable tax treatment granted to municipal debt, including the Bonds and other debt issued by the District. See the discussion in "TAX EXEMPTION" herein.

TAX EXEMPTION

Hodgson Russ LLP, of Buffalo, New York, Bond Counsel, will deliver an opinion that, under existing law, the interest on the Bonds is excluded from gross income of the holders thereof for federal income tax purposes and is not an item of tax preference for the purpose of the individual alternative minimum tax imposed by the Code. However, such opinion will note that the District, by failing to comply with certain restrictions contained in the Code, may cause interest on the Bonds to become subject to federal income taxation from the date of issuance of the Bonds. Such opinion will state that interest on the Bonds is exempt from personal income taxes imposed by New York State or any political subdivision thereof (including The City of New York).

In rendering the foregoing opinions, Bond Counsel will note that the exclusion of the interest on the Bonds from gross income for federal income tax purposes is subject to, among other things, continuing compliance by the District with the applicable requirements of Code sections 141, 148, and 149, and the regulations promulgated thereunder (collectively, the "Tax Requirements"). In the opinion of Bond Counsel, the tax certificate that will be executed and delivered by the District in connection with the issuance of the Bonds (the "Certificate") establishes requirements and procedures, compliance with which will satisfy the Tax Requirements.

The Tax Requirements referred to above, which must be complied with in order that interest on the Bonds remains excluded from gross income for federal income tax purposes, include, but are not limited to:

1 The requirement that the proceeds of the Bonds be used in a manner so that the Bonds are not obligations which meet the definition of a "private activity bond" within the meaning of Code section 141;

2 The requirements contained in Code section 148 relating to arbitrage bonds; and

3 The requirements that payment of principal or interest on the Bonds not be directly or indirectly guaranteed (in whole or in part) by the United States (or any agency or instrumentality thereof) as provided in Code section 149(b).

In the Certificate, the District will covenant to comply with the Tax Requirements, and to refrain from taking any action which would cause the interest on the Bonds to be includable in gross income for federal income tax purposes. Any violation of the Tax Requirements may cause the interest on the Bonds to be included in gross income for federal income tax purposes from the date of issuance of the Bonds. Hodgson Russ LLP expresses no opinion regarding other federal tax consequences arising with respect to the Bonds.

Prospective purchasers of the Bonds should be aware that ownership of, accrual or receipt of interest on, or disposition of, the Bonds may have collateral federal income tax consequences for certain taxpayers, including financial institutions, property and casualty insurance companies, S corporations, certain foreign corporations, individual recipients of Social Security or Railroad Retirement benefits, and taxpayers who may be deemed to have incurred or continued indebtedness to purchase or carry such obligations. Prospective purchasers should consult their tax advisors as to any possible collateral consequences from their ownership of, or receipt of interest on, or disposition of, the Bonds. Bond Counsel expresses no opinion regarding any such collateral federal income tax consequences.

In general, information reporting requirements will apply to non-corporate holders with respect to payments of principal, payments of interest, and the proceeds of the sale of a bond or note before maturity within the United States. Backup withholding may apply to a holder of the Bonds under Code section 3406, if such holder fails to provide the information required on Internal Revenue Service ("IRS") Form W-9, Request for Taxpayer Identification Number and Certification, or the IRS has specifically identified the holder as being subject to backup withholding because of prior underreporting. Any amounts withheld under the backup withholding rules from a payment to a beneficial owner, and which constitutes over-withholding, would be allowed as a refund or a credit against such beneficial owner's United States federal income tax provided the required information is furnished to the IRS. Neither the information reporting requirement nor the backup withholding requirement affects the excludability of interest on the Bonds from gross income for federal income tax purposes.

Bond Counsel has not undertaken to advise in the future whether any events occurring after the date of issuance of the Bonds may affect the tax status of interest on the Bonds. The Code has been continuously subject to legislative modifications, amendments, and revisions, and proposals for further changes are regularly submitted by leaders of the legislative and executive branches of the federal government. No representation is made as to the likelihood of such proposals being enacted in their current or similar form, or if enacted, the effective date of any such legislation, and no assurances can be given that such proposals or amendments will not materially and adversely affect the economic value of the Bonds or the tax consequences of ownership of the Bonds. Prospective purchasers are encouraged to consult with their own legal and tax advisors with respect to these matters.

DOCUMENTS ACCOMPANYING DELIVERY OF THE BONDS

Absence of Litigation

Upon delivery of the Bonds, the District will furnish certificates, dated the date of delivery of the Bonds, to the effect that there is no controversy or litigation of any nature pending or threatened to restrain or enjoin the issuance, sale, execution or delivery of the Bonds, or in any way contesting or affecting the validity of the Bonds or any of the proceedings taken with respect to the issuance and sale thereof or the application of moneys to the payment of the Bonds. Additional certificates will state that there is no controversy or litigation of any nature now pending or threatened by or against the District wherein an adverse judgment or ruling could have a material adverse impact on the financial condition of the District or adversely affect the power of the District to levy, collect, and enforce the collection of taxes or other revenues for the payment of its Bonds, which has not been disclosed in this Official Statement.

Legal Matters

Legal matters incident to the authorization, issuance and sale of the Bonds will be subject to the final approving opinion of Bond Counsel. Such opinion will be available at the time of delivery of the Bonds and will be to the effect that the Bonds are valid and legally binding general obligations of the District for which the District has validly pledged its faith and credit, and all the taxable real property within the District is subject to the levy of *ad valorem* real property taxes to pay the Bonds and interest thereon, without limitation as to rate or amount (subject to certain statutory limitations imposed by Chapter 97 of the 2011 Laws of the State). Such opinion shall also contain further statements to the effect that (a) the enforceability of rights or remedies with respect to the Bonds may be limited by bankruptcy, insolvency, or other laws affecting creditors' rights or remedies heretofore or hereafter enacted, and (b) such law firm has not been requested to examine or review and has not examined or reviewed the accuracy or sufficiency of the Official Statement, or any additional proceedings, reports, correspondence, financial statements or other documents, containing financial or other information relative to the District which has been or may have been furnished or disclosed to purchasers of the Bonds, and expresses no opinion with respect to such financial or other information, or the accuracy or sufficiency thereof.

Closing Certificates

Upon the delivery of the Bonds, the purchaser will be furnished with the following items: (i) a certificate of the President of the Board of Education of the District to the effect that as of the date of this Official Statement and at all times subsequent thereto, up to and including the time of the delivery of the Bonds, this Official Statement did not and does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements herein, in the light of the circumstances under which they were made, not misleading, and further stating that there has been no adverse material change in the financial condition of the District since the date of this Official Statement to the date of issuance of the Bonds; and having attached thereto a copy of this Official Statement; (ii) a certificate signed by an officer of the District evidencing payment for the Bonds; (iii) a closing certificate evidencing the due execution of the Bonds, including statements that (a) no litigation of any nature is pending or, to the knowledge of the signers, threatened, restraining or enjoining the issuance and delivery of the Bonds or the levy and collection of taxes to pay the principal of and interest thereon, nor in any manner questioning the proceedings and authority under which the Bonds were authorized or affecting the validity of the Bonds thereunder, (b) neither the corporate existence or boundaries of the District nor the title of the signers to their respective offices is being contested, and (c) no authority or proceedings for the issuance of the Bonds have been repealed, revoked or rescinded; and (iv) a tax certificate executed by the President of the Board of Education, as described under "TAX EXEMPTION" herein.

DISCLOSURE UNDERTAKING

Unless the Bonds are purchased for the buyer's own account as principal, for investment and not for resale, at the time of the delivery of the Bonds, the District will provide an executed copy of its Disclosure Undertaking (the "Undertaking") pursuant to Securities and Exchange Commission (the "Commission") Rule 15c2-12 (the "Rule"). The Undertaking will constitute a written agreement or contract of the District for the benefit of holders of and owners of beneficial interests in the Bonds, to provide, or cause to be provided to the Electronic Municipal Market Access ("EMMA") system implemented by the Municipal Securities Rulemaking Board established pursuant to Section 15B(b)(1) of the Securities Exchange Act of 1934, or other entity designated or authorized by the Commission to receive reports pursuant to the Rule:

> (1) (i) certain annual financial information, in a form generally consistent with the information contained or cross-referenced in this Official Statement in Appendix A under the headings: "THE DISTRICT", "FINANCIAL FACTORS", "TAX INFORMATION", "DISTRICT INDEBTEDNESS" "ECONOMIC AND DEMOGRAPHIC DATA" and "LITIGATION"; and in Appendix B and (ii) the audited financial statement, if any, of the District for each fiscal year; both of which will be provided on or prior to the final day of the 9th month following the end of each fiscal year, commencing with the fiscal year ending June 30, 2018, unless such audited financial statement, if any, shall not then be available in which case the annual financial information and audited financial statement shall be provided within 60 days after the audited financial statement becomes available and in no event later than 360 days after the end of each fiscal year;
>
> (2) timely notice, not in excess of ten (10) business days after the occurrence of such event, of the occurrence of any of the following events:
>
>> (i) principal and interest payment delinquencies; (ii) non-payment related defaults, if material; (iii) unscheduled draws on debt service reserves reflecting financial difficulties; (iv) unscheduled draws on credit enhancements reflecting financial difficulties; (v) substitution of credit or liquidity providers, or their failure to perform; (vi) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices of determinations with respect to the tax status of the Bonds, or other material events affecting the tax status of the Bonds; (vii) modifications to rights of Bondholders, if material; (viii) bond and note calls, if material, and tender offers; (ix) defeasances; (x) release, substitution, or sale of property securing repayment of the Bonds, if material; (xi) rating changes; (xii) bankruptcy, insolvency, receivership or similar event of the District; [note to clause (xii): For the purposes of the event identified in clause (xii) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the District in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or governmental authority has assumed jurisdiction over substantially all of the assets or business of the District, or if such jurisdiction has been assumed by leaving the existing governing body and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the District]; (xiii) the consummation of a merger, consolidation, or acquisition involving the District or the sale of all or substantially all of the assets of the District, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if

material; and (xiv) appointment of a successor or additional trustee or the change of name of a trustee, if material.

Event (iii) is included pursuant to a letter from the SEC staff to the National Association of Bond Lawyers dated September 19, 1995. However, event (iii) is not applicable, since no "debt service reserves" will be established for the Bonds.

With respect to event (iv) the District does not undertake to provide any notice with respect to credit enhancement added after the primary offering of the securities.

The District may provide notice of the occurrence of certain other events, in addition to those listed above, if it determines that any such other event is material with respect to the Bonds; but the District does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above; and

(3) in a timely manner, notice of a failure to provide the annual financial information by the date specified.

The District's Undertaking shall remain in full force and effect until such time as the principal of, redemption premiums, if any, and interest on the Bonds shall have been paid in full or in the event that those portions of the Rule which require the Undertaking, or such provision, as the case may be, do not or no longer apply to the Bonds. The sole and exclusive remedy for breach or default under the Undertaking is an action to compel specific performance of the undertakings of the District, and no person or entity, including a holder of the Bonds, shall be entitled to recover monetary damages thereunder under any circumstances. Any failure by the District to comply with the Undertaking will not constitute a default with respect to the Bonds.

The District reserves the right to amend or modify the Undertaking under certain circumstances set forth therein; provided that any such amendment or modification will be done in a manner consistent with the Rule. Under the scenario in which the Bonds are purchased for the purchaser's own account as principal, for investment and not for resale, the purchaser shall deliver a certificate that documents such intent (in form satisfactory to the District's bond counsel) and establishes that an exemption from the Rule applies.

Prior Disclosure History

For the past five years, the District has compiled, in all material respects, with its continuing disclosure undertakings to provide audited annual financial statements and statements of annual financial information. However, over the past five years there have been a variety of ratings changes to the municipal bond insurers which insure the outstanding serial bonds of the District, and notices of these rating changes were not timely filed in accordance with the Rule. However, notices of these insurance ratings changes based on bond insurer downgrades were filed on August 1, 2014.

RATING

Moody's has assigned an underlying rating of "Aa3 " to the uninsured outstanding bonded indebtedness of the District, including the Bonds.

Such rating reflects only the view of such organization and any desired explanation of the significance of such rating should be obtained from the rating agency furnishing the same, at the following addresses: Moody's Investors Service, Inc., 250 Greenwich Street, New York, New York 10007. Generally, a rating agency bases its rating on the information and materials furnished to it and on investigations, studies and assumptions of its own. There is no assurance such rating will continue for any given period of time or that such rating will not be revised downward or withdrawn entirely by the rating agency, if in the judgment of such rating agency, circumstances so warrant. Any such downward revision or withdrawal of any of the rating may have an adverse effect on the market price of the Bonds.

MISCELLANEOUS

So far as any statements made in this Official Statement involve matters of opinions or estimates, whether or not so expressly stated, they are set forth as such and not as representations of fact, and no representation is made that any of the opinions or estimates will be realized. Neither this Official Statement nor any statement which may have been made orally or in writing is to be construed as a contract with the holders of the Bonds.

Statements in this Official Statement, and the documents included by specific reference, that are not historical facts are forward-looking statements, which are based on the District management's beliefs as well as assumptions made by, and information currently available to, the District's management and staff. Because the statements are based on expectations about future events and economic performance and are not statements of fact, actual results may differ materially from those projected. Important factors that could cause future results to differ include legislative and regulatory changes, changes in the economy, and other factors discussed in this and other documents that the District files with the repositories. When used in District documents or oral presentation, the words "anticipate", "estimate", "expect", "objective", "projection", "forecast", "goal", or similar words are intended to identify forward-looking statements.

Bond Counsel, expresses no opinions as to the accuracy or completeness of information in any documents prepared by or on behalf of the District for use in connection with the offer and sale of the Bonds, including but not limited to, the financial or statistical information in this Official Statement.

References herein to the Constitution of the State and various State and federal laws are only brief outlines of certain provisions thereof and do not purport to summarize or describe all of such provisions.

Concurrently with the delivery of the Bonds, the District will furnish a certificate to the effect that as of the date of the Official Statement, the Official Statement did not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements herein, in the light of the circumstances under which they were made, not misleading, subject to a limitation as to information in the Official Statement obtained from sources other than the District.

The Official Statement is submitted only in connection with the sale of the Bonds by the District and may not be reproduced or used in whole or in part for any other purpose.

MUNICIPAL ADVISOR

Capital Markets Advisors, LLC, Orchard Park, New York, (the "Municipal Advisor") is an independent municipal advisor registered with the United States Securities and Exchange Commission and the Municipal Securities Rulemaking Board. The Municipal Advisor has served as the independent municipal advisor to the District in connection with this transaction.

In preparing the Official Statement, the Municipal Advisor has relied upon governmental officials, and other sources, who have access to relevant data to provide accurate information for the Official Statement. The Municipal Advisor has not been engaged, nor has it undertaken, to independently verify the accuracy of such information. The Municipal Advisor is not a public accounting firm and has not been engaged by the District to compile, review, examine or audit any information in the Official Statement in accordance with accounting standards. The Municipal Advisor is not a law firm and does not provide legal advice with respect to this or any debt offerings of the District. The Municipal Advisor is an independent advisory firm and is not engaged in the business of underwriting, trading or distributing municipal securities or other public securities and therefore will not participate in the underwriting of the Bonds.

ADDITIONAL INFORMATION

Additional information may be obtained from Mr. Jeffrey Petrus, Assistant Superintendent for Business, (716) 209-6209; Email: jpetrus@opschools.org; Address: 2240 Southwestern Blvd., West Seneca, New York 14224 or from the District's Municipal Advisor, Capital Markets Advisors, LLC, (716) 662-3910.

Any statements in this Official Statement involving matters of opinion or estimates, whether or not expressly so stated, are intended as such and not as representations of fact. No representation is made that any of such statements will be realized. This Official Statement is not to be construed as a contract or agreement between the District and the original purchasers or holders of any of the Bonds.

Capital Markets Advisors, LLC may place a copy of this Official Statement on its website at www.capmark.org. Unless this Official Statement specifically indicates otherwise, no statement on such website is included by specific reference or constitutes a part of this Official Statement. Capital Markets Advisors, LLC has prepared such website information for convenience, but no decisions should be made in reliance upon that information. Typographical or other errors may have occurred in converting original source documents to digital format, and neither the District nor Capital Markets Advisors, LLC assumes any liability or responsibility for errors or omissions on such website. Further, Capital Markets Advisors, LLC and the District disclaim any duty or obligation either to update or to maintain that information or any responsibility or liability for any damages caused by viruses in the electronic files on the website. Capital Markets Advisors, LLC and the District also assume no liability or responsibility for any errors or omissions or for any updates to dated website information.

Orchard Park Central School District
Erie County, New York

By: /s/ *David Nielsen*
Mr. David Nielsen
President of the Board of Education

DATED: March __, 2018

APPENDIX A

THE DISTRICT

THE DISTRICT

General Information

The District, which comprises an area of approximately 50 square miles and has a current estimated population of 32,000, is located in the south-central portion of Erie County about eight miles southeast of the City of Buffalo. On a valuation basis, the District includes most of the Town of Orchard Park and portions of the Towns of Aurora, Boston, Elma, Hamburg and West Seneca. Portions of the District closest to Buffalo are suburban in character while outlying areas are more rural. There has been recent growth in the number of single family residences, garden apartments and townhouses. Most residents of the District are employed in business, industry and professions in Buffalo or the Niagara Frontier. There is some light industry within the District, but plants and business represent only a modest portion of the property tax rolls. During the mid-1980's, an industrial park in the Town of Orchard Park was established. Businesses located in Quaker Centre Industrial Park include Enidine Inc., Gaymar Industries and Buffalo Envelope.

Recreation areas and facilities abound including the recently-renovated and renamed 72,000 seat New Era Field, the home of the Buffalo Bills, and a large indoor tennis club. Three area parks and Chestnut Ridge, a County park, are located within the District's boundaries.

Transportation is provided through the District on State routes 20A, 219 and 62 including the 219 Expressway from Buffalo to the southern tier. Bus service is provided by the Niagara Frontier Transportation Authority on a regular, commuter basis. Major airlines operate from the Buffalo-Niagara International Airport, a 20-minute drive from the District. The New York State Thruway and several railroads also serve the area.

The majority of the District's residents receive fire protection from four regional volunteer fire companies. Police protection is provided by the Town of Orchard Park Police Department, the Erie County Sheriff's Department and the New York State Police. Water and sewer services are provided by the Erie County Water Authority.

The following banks have one or more offices within the District: Bank of America, Key Bank, Five Star Bank, Citizens Bank, Evans National Bank, and M&T Bank.

District Organization

Subject to the provisions of the State Constitution, the District operates pursuant to the Education Law, the Local Finance Law, other laws generally applicable to the District, and any special laws applicable to the District. Under such laws, there is no authority for the District to have a charter or adopt local laws.

The legislative power of the District is vested in the Board of Education (the "Board"). Under current law, an election is held within the District boundaries on the third Tuesday of May each year to elect members of the Board. Board members are generally elected for a term of three years.

In early July of each year, the Board meets for the purposes of reorganization. At that time, the Board elects a President and Vice President, and appoints a District Clerk and District Treasurer.

The major administrative officers of the District, whose duty it is to implement the policies of the Board and who are appointed by the Board, include the Superintendent of Schools, the Assistant Superintendent for Business & Support Services, the District Treasurer and the District Clerk.

Financial Organization

Pursuant to the Local Finance Law, the President of the Board is the chief fiscal officer of the District. However, certain of the financial functions of the District are the responsibility of the Superintendent of Schools, the Assistant Superintendent for Business & Support Services and the District Treasurer.

Budgetary Procedure

The District's fiscal year begins on July 1 and ends on June 30. Starting in the fall or winter of each year, the District's financial plan and enrollment projection are reviewed and updated and the first draft of the next year's proposed budget is developed by the central office staff. During the winter and early spring the budget is developed and refined in conjunction with the school building principals and department supervisors. Under current law, the budget is submitted to voter referendum on the third Tuesday of May each year. Summaries of the District's adopted budgets for the current and previous fiscal year may be found in Appendix B, attached hereto.

The voters approved the District's 2017-18 budget on May 16, 2017.

Financial Statements and Accounting Procedures

The financial accounts of the District are maintained in accordance with the New York State Uniform System of Accounting for School Districts. Such accounts are audited annually by independent auditors, and financial statements prepared in accordance with generally accepted accounting principles are available for public inspection upon request. A copy of the District's most recent audited financial statement is contained in Appendix C.

School Enrollment Trends

The following table presents actual and projected school enrollment trends for the District.

TABLE 1
School Enrollment Trends

Fiscal Year	Actual Enrollment	Fiscal Year	Projected Enrollment
2015-16	4,759	2018-19	4,625
2016-17	4,662	2019-20	4,600
2017-18	4,650	2020-21	4,600

Source: District Officials.

District Facilities

The District owns or operates the following facilities:

TABLE 2
District Enrollment

Names	Grades	Enrollment For 2017-18
High School	9-12	1,512
Middle School	6-8	1,226
Eggert Elementary School	K-5	513
Ellicott Elementary School	K-5	604
South Davis Elementary School	K-5	346
Southwestern Blvd. Complex (1)	Admin. Bldgs. & Bus Garage	N/A
Windom Elementary	K-5	561
	Total:	4,762

(1) The Southwestern Blvd. Complex includes a District Office Building, Special Education Office Building, Transportation Building, Bus Wash Building and a Storage Building.

Employees

The District provides services through both full-time and part-time employees, all of whom are represented by the following units of organized labor.

TABLE 3
Employees

Number of Employees	Organization	Contract Expiration Date
325	Orchard Park School Related Personnel	06/30/2018
10	Orchard Park Principals Association	06/30/2020 (1)
443	Orchard Park Teachers Association	08/31/2019
7	Orchard Park COAA	06/30/2020 (1)

(1) OPCOAA & OPPA groups settled three year contracts expiring June 30, 2020

Source: District Officials.

Employee Pension Benefits

All non-teaching and non-certified administrative employees of the District eligible for pension or retirement benefits under the Retirement and Social Security Law of the State of New York are members of the New York and Local Employees' Retirement System ("ERS").

Teachers and certified administrators are members of the New York State Teachers' Retirement System ("TRS" and collectively with the ERS, the "Retirement Systems"). Payments to the Retirement Systems are deducted from the District's State aid payments.

Both the ERS and the TRS are non-contributing with respect to members hired prior to July 27, 1976. The Retirement Systems are non-contributory with respect to members working ten or more years. All members working less than ten years must contribute 3% of gross annual salary toward the cost of retirement programs.

The following table details the District's contractually required contributions to the ERS for the preceding four audited fiscal years, and the budgeted amount for the fiscal year ending March 31, 2018 (for ERS, the Comptroller annually certifies the actuarially determined rates expressly used in computing the employers' contributions based on salaries paid during the Systems' fiscal year ending March 31):

Fiscal Year Ending 3/31	ERS
2018 *(Budgeted)*	$2,048,400
2017	1,658,630
2016	1,855,611
2015	2,113,224
2014	2,165,196

Source: Audited Financial Statements and Office of the State Comptroller.

The following table details the District's actual required contributions to the TRS for the preceding four audited fiscal years ended June 30 and budgeted fiscal year 2018:

Fiscal Year Ending 6/30	TRS
2018 *(Budgeted)*	$3,805,000
2017	4,211,592
2016	4,544,351
2015	5,925,314
2014	5,426,461

Source: Audited Financial Statements and Office of the State Comptroller.

On December 10, 2009, then-Governor Paterson signed into law a new Tier 5 pension program. The law was effective for new ERS and TRS employees hired after January 1, 2010 until April 1, 2012. New ERS employees will now contribute 3% of their salaries and new TRS employees will contribute 3.5% of their salaries. There is no provision for these contributions to cease after a certain period of service.

On March 16, 2012, Governor Cuomo signed into law the new Tier 6 pension program, effective for new ERS and TRS employees hired after April 1, 2012. The Tier 6 legislation provides for increased employee contribution rates of between 3% and 6%, an increase in the retirement age from 62 years to 63 years, a readjustment of the pension multiplier, and a change in the time period for final average salary calculation from three years to five years. Tier 6 employees will vest in the system after ten years of employment and will continue to make employee contributions throughout employment.

Pension reform legislation enacted in 2003 and 2004 changed the cycle of ERS billing to match budget cycles of the District. Under the previous method, the District was unsure of how much it paid to the system until after its budget was implemented. Under the current method the contribution for a given fiscal year will be based on the value of the pension fund on April 1 of the prior fiscal year instead of the following April 1 so that the District will be able to more accurately include the cost of the contribution into its budget. The reform legislation also (i) required the District to make a minimum contribution of 4.5% of payroll every year, including years in which the investment performance of the fund would make a lower contribution possible and (ii) moved the annual payment date for contributions from December 15th to February 1st, effective December 15, 2004.

The New York State ERS rate for the 2016-17 fiscal year was 16.1%. The 2017-18 ERS rate is not expected to change. The New York State TRS rate for the 2016-17 fiscal year was 11.72%. The 2017-18 TRS rate is expected to be 9.8%.

Due to poor performance of the investment portfolio of the State Retirement System in the wake of the 2008-09 recession, New York State Comptroller Thomas DiNapoli announced that the employer contribution rates for required pension contributions to the SRS would continue to increase. To help mitigate the impact of their ERS increases, legislation has been enacted that permits local governments and school districts to amortize a portion of such contributions. Under such legislation, local governments and school districts that choose to amortize a portion of their ERS contributions will be required to set aside and reserve funds with the SRS for certain future rate increases. The District has not opted into the pension amortization plan.

In Spring 2013, the State and TRS approved a Stable Contribution Option ("SCO") that gives school districts the ability to better manage the spikes in Actuarially Required Contribution rates ("ARCs"). ERS followed suit and modified its existing SCO, which was adopted in 2010. Each plan allows school districts to pay the SCO amount in lieu of the ARC amount, which is higher, and defer the difference in payment amounts as described below. The plan, which was approved as part of Governor Cuomo's 2016-17 budgets would let districts contribute 14.13% of employee costs toward pensions. The District has not opted into the pension smoothing plan.

The TRS SCO deferral plan is available to school districts for seven years after enactment. Under the TRS SCO plan, payment of the deferred amount will commence in year six of the program (2018-19) and continue for five years. School districts can elect to no longer participate in the plan at any time, resume paying the ARC and begin repayment of deferred amounts over five years. Under the ERS SCO, payment of deferred amounts begins the year immediately following the deferral and the repayment period is 12 years. Once made, the election to participate in the ERS SCO is permanent. However, the school districts can choose not to defer payment in any given year. In both plans, interest on the deferred amounts is based on the yield of 10-year U.S. Treasury securities plus 1%.

The primary benefit of participation in the SCO plans is the elimination of the uncertainty in the volatility of future pension contribution ARCs in the near term, thereby providing school districts with significant assistance in its ability to create a stable and reliable fiscal plan. The District has not and does not plan to participate in the ERS or TRS SCO program.

Other Post-Employment Benefits

The District provides post-retirement healthcare benefits to various categories of former employees. These costs have been rising substantially, and may be expected to rise substantially in the future. School districts and Boards of Cooperative Education Services, unlike other municipal units of government in the State, have been prohibited from reducing retiree health benefits or increasing health care contributions received or paid by retirees below the level of benefits or contributions afforded to or required from active employees. This protection from unilateral reduction of benefits had been extended annually by the New York State Legislature until recently when legislation was enacted to make permanent these health insurance benefit protections for retirees. Legislative attempts to provide similar protection to retirees of other local units of government in the State have not succeeded as of the date hereof. Nevertheless, many such retirees of all varieties of municipal units in the State do presently receive such benefits.

Effective July 1, 2016, the District adopted GASB Statement No. 75, *Accounting and Financial Reporting for Postemployment Benefits Other than Pensions* (OPEB), which supersedes GASB Statement No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other than Pensions*. This statement requires the District to recognize the total OPEB liability and related deferred outflows and deferred inflows of resources. The cumulative effect of implementing this required change in accounting principle resulted in a restatement of beginning net position as detailed in Note 2 to the District's financial statements. This statement addresses accounting and financial reporting for other postemployment benefits offered by the District and requires various note disclosures and required supplementary information.

Under GASB Statement No. 75, the total OPEB liability represents the sum of expected future benefit payments which may be attributed to past service (or "earned"), discounted to the end of the fiscal year using the current discount rate. The total OPEB liability is analogous to the Unfunded Actuarial Accrued Liability ("AAL") under GASB Statement No. 45.

The District is in compliance with the requirements of GASB 75, and a summary of the actuarial valuation is included in the District's Audited Financial Statement dated June 30, 2017 attached hereto as Appendix C. The following table summarizes the District's annual OPEB statements for the year ended June 30, 2017:

Information on beginning of year deferred outflows and deferred inflows of resources, and all information for the prior year, is not available and therefore such amounts have not been restated.

Changes in the Total OPEB Liability	**Total OPEB Liability**
Balance as of June 30, 2016	$6,107,665
Changes for the year:	
Service cost	200,551
Interest	202,312
Change of assumptions	350,158
Differences between expected and actual experience	(1,439,651)
Benefit payments	(269,047)
Net changes	(955,677)
Balance as of June 30, 2017	$5,151,988

Investment Policy/Permitted Investments

Pursuant to State law, including Sections 10 and 11 of the General Municipal Law (the "GML"), the District is generally permitted to deposit moneys in banks and trust companies located and authorized to do business in the State. All such deposits, including special time deposit accounts and certificates of deposit, in excess of the amount insured under the Federal Deposit Insurance Act, are required to be secured in accordance with the provisions of and subject to the limitations of Section 10 of the GML.

The District may also temporarily invest moneys in: (1) obligations of the United States of America; (2) obligations guaranteed by agencies of the United States of America where the payment of principal and interest are guaranteed by the United States of America; (3) obligations of the State of New York; (4) with the approval of the New York State Comptroller, tax anticipation notes or revenue anticipation notes issued by any municipality, school district, or district corporation, other than those bonds issued by the District; (5) certificates of participation issued by political subdivisions of the State pursuant to Section 109-b(10) of the GML; (6) obligations of a New York public benefit corporation which are made lawful investments for municipalities pursuant to the enabling statute of such public benefit corporation; or (7) in the case of moneys held in certain reserve funds established by the District pursuant to law, obligations of the District.

All of the foregoing instruments and investments are required to be payable or redeemable at the option of the owner within such times as the proceeds will be needed to meet expenditures for purposes for which the moneys were provided and, in the case of instruments and investments purchased with the proceeds of bonds or notes, shall be payable or redeemable in any event, at the option of the owner, within two years of the date of purchase. Unless registered or inscribed in the name of the District, such instruments and investments must be purchased through, delivered to and held in custody of a bank or trust company in the State pursuant to a written custodial agreement as provided in Section 10 of the GML.

The Board has adopted an investment policy and such policy conforms with applicable laws of the State governing the deposit and investment of public moneys. All deposits and investments of the District are made in accordance with such policy.

FINANCIAL FACTORS

District finances are operated primarily through its General Fund. All taxes and most other revenues are paid into this fund and all current operating expenditures are made from it. A Statement of Revenues and Expenditures for each of the last five fiscal years ending June 30 is contained in Appendix B. As reflected in Appendix B, the District derives the majority of its annual revenues from a tax on real property. Capital improvements are generally financed by the issuance of bonds and bond anticipation notes.

Real Property Taxes

The District derives a major portion of its revenues from a tax on real property (see "Statement of Revenues, Expenditures and Changes in Fund Balance-General Fund" in Appendix B, herein). Property taxes accounted for 57.9% of total general fund revenues for the fiscal year ended June 30, 2017, while State aid accounted for 26.9%.

The following table sets forth total general fund revenues and real property tax revenues during the last five fiscal years and the amount budgeted for the current fiscal year.

TABLE 4
Property Taxes

Fiscal Year Ending June 30:	Total Revenues	Real Property Taxes	Real Property Tax Revenues to Revenues
2013	$81,345,737	$47,105,801	57.9%
2014	83,478,377	48,761,630	58.4%
2015	87,828,122	50,905,500	58.0%
2016	89,780,204	52,819,538	58.8%
2017	93,301,262	54,009,206	57.9%
2018 *Budgeted*	95,317,895	55,354,907	58.1%

Source: Audited Financial Statements and Adopted Budget of the District.

State Aid

The District receives State aid for operating and other purposes at various times throughout its fiscal year, pursuant to formulas and payment schedules set forth by statute.

The following table sets forth total general fund revenues and State aid revenues during the last five fiscal years and the amount budgeted for the current fiscal year.

TABLE 5
State Aid

Fiscal Year Ending June 30:	Total Revenues	Total State Aid [1]	Total Revenues Consisting of State Aid
2013	$81,345,737	$20,889,510	25.7%
2014	83,478,377	21,217,237	25.4%
2015	87,828,122	22,486,490	25.6%
2016	89,780,204	23,064,488	25.7%
2017	93,301,262	25,059,417	26.9%
2018 *Budgeted*	95,317,895	27,212,768	28.5%

[1] General Fund only.

Source: Audited Financial Statements and Adopted Budget of the District.

In addition to the amount of State Aid budgeted by the District in its 2017-18 fiscal year, the State is expected to make payments of STAR aid representing tax savings provided by school districts to their taxpayers under the STAR (see "STAR-School Tax Exemption herein.") Program. The District expects to receive timely receipt of STAR aid for the current fiscal year.

In January 2001, the State Supreme Court issued a decision in *Campaign for Fiscal Equity v. New York* mandating that the current system of apportionment of state aid to school districts within the State be restructured by the Governor and the State Legislature. On June 25, 2002, the Appellate Division of the State Supreme Court reversed that decision. On June 26, 2003, the State Court of Appeals, the highest court in the State, reversed the Appellate Division, holding that the State must, by July 30, 2004, ascertain the actual cost of providing a sound basic education, enact reforms to the system of school funding and ensure a system of accountability for such reforms. The Court of Appeals further modified the decision of the Appellate Division by deciding against a Statewide remedy and instead limited its ruling solely to the New York City school system.

A case related to the *Campaign for Fiscal Equity, Inc. v. State of New York* was heard on appeal on May 30, 2017 in *New Yorkers for Students' Educational Rights ("NYSER") v. State of New York*. The *NYSER* lawsuit asserted that the State failed to comply with the original decision in the Court of Appeals in *Campaign for Fiscal Equity*, and asked the Court of Appeals to require the State to develop new methodologies, formulas and mechanisms for determining State aid, to fully fund the "foundation aid" formula, to eliminate the supermajority requirement for voter approval of budgets which increase school district property tax levies above the property tax cap limitation, and related matters. On June 27, 2017, the Court of Appeals held that the plaintiff's causes of action were properly dismissed except for two causes of action regarding accountability mechanisms and sufficient state funding for a "sound basic education" limited solely to the New York City and Syracuse school districts.

While certain increases in State aid following this case have been targeted to high-needs schools and other schools did share in the overall increase of State aid, the District is unable to predict whether this pattern of distribution will continue beyond that which is included in later legislation dealing with foundation aid. Increased State aid for New York City schools and other high-needs schools may result in reductions in the future of State aid to certain school districts, including the District.

In any event, the outcome of this matter will not affect the validity of any obligations issued by the District, including the Bonds, nor the ability of the District to levy taxes on the taxable real property in the District to pay the Bonds and the interest thereon as the same shall become due and payable.

The Gap Elimination Adjustment ("GEA") law was first introduced for the 2010-11 fiscal year (although it existed in 2009-10 and was called "Deficit Reduction Assessment") as a way to help close the State's then $10 billion budget deficit. Under legislation, a portion of the funding shortfall at the State level is divided among all school districts throughout the State and reflected as a reduction in school district State aid. The GEA is a negative number, money that is deducted from the aid originally due to the District. Since the program began, the GEA and Deficit Reduction Assessment reduction in State aid for the District has amounted to approximately $3.86 million annually. As a result, the District was forced to reduce programs, services, and staff accordingly. Beginning in the 2012-13 fiscal year, the State made modest restorations to the GEA. In the 2014-15 fiscal year, the GEA was reduced by $546,653, dropping the total GEA to $3.32 million. In the 2015-16 fiscal year, it was further reduced by $1.20 million, yielding a remaining annual GEA figure of $2.11 million. In the 2016-17 fiscal year, the GEA was eliminated.

The Smart Schools Bond Act was approved by the State's voters in 2014. The Smart Schools Bond Act authorizes the issuance of $2 billion of general obligation bonds to finance improved educational technology and infrastructure to improve learning and opportunity for students throughout the State. The District's estimated allocation of such funds is $2,333,018.

There can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. The availability of such monies and the timeliness of such payment could be affected by a delay in the adoption of the State budget. In any event, State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefor.

Recent Events Affecting New York School Districts

State district fiscal year (2012-13): The budget included an increase of $751 million in State aid for school districts.

State district fiscal year (2013-14): The budget included an increase of $1.0 billion in State aid for school districts.

School district fiscal year (2014-15): The budget included an increase of $807 million in State aid for school districts.

School district fiscal year (2015-16): The State budget provided for school aid of approximately $23.5 billion, which represented an increase of approximately $1.3 billion, or 7.4%, in total school aid spending from the 2014-15 school year. The budget continued a three-year appropriation methodology established in the 2011-12 State fiscal year and limited future school aid increases to growth as measured by the total personal income of residents of the State.

School district fiscal year (2016-17): The State budget includes an increase of $991 million in State aid for school districts over the 2015-16 budget, $863 million of which consists of traditional operating aid. In addition to the $408 million of expense based aid, the budget included a $266 million increase in Foundation Aid and a $189 million restoration to the Gap Elimination Adjustment. The majority of the remaining increase included $100 million in Community Schools Aid, a newly adopted aid category, to support school districts that wish to create community schools. The funds may only be used for certain purposes such as providing health, mental health and nutritional services to students and their families. The budget included School Aid spending of $24.8 billion, a $1.5 billion increase (6.5% increase) from the prior fiscal year.

School district fiscal year (2017-18): The State budget provisions relating to the District's fiscal year were adopted on April 9, 2017 and signed by the Governor on April 20, 2017.

The State's 2017-18 Enacted Budget and the Governor's 2018-2019 Proposed Budget each provide for an increase of $1.1 billion and $769 million in school aid for the 2017-18 and 2018-19 school years, respectively. The proposed Executive Budget for the 2018-19 fiscal year provides for $27,253,568 of State Aid to the District, representation, a 1.00% decrease from the District's 2017-18 school year.

The State's 2017-18 Enacted Budget increased Education Aid by $1.1 billion, including a $700 million increase in Foundation Aid, without revision to the formula, bringing the new Education Aid total to $25.8 billion or an increase of 4.4 percent. It is reported in the press that approximately $3.6 billion in Foundation Aid will continue to be due in order to fully phase-in and implement the existing formula. Expense-based aids to support school construction, pupil transportation, BOCES and special education were continued in full, as has been customary in recent years. Transportation Aid increased 5.5 percent and Building Aid increased 4.8 percent. The budget continued to link school aid increases for 2017-18 and 2018-19 with teacher and principal evaluation plans approved by September 1 of the current year in compliance with Education Law section 3012-d. The budget included a provision to permit school districts to authorize and establish conditions for the partial payment of property taxes.

The District presently anticipates an increase in its State Aid not related to building aid for its 2017-18 fiscal year in an amount of $1,368,665.

It should also be noted that the District receives federal aid for certain programs. In its last audited fiscal year, the District received $151,794 in such direct federal aid. It is not possible to predict whether such aid will continue in the future, or if continued, whether it will be funded at present levels.

The State 2017-18 Enacted Budget allowed the Governor to reduce expenditures (including aid to school districts) mid-year if revenues (including, but not limited to, funding from the federal government) are less than what was expected. If federal support is reduced by $850 million or more, the Governor will develop a plan to make uniform spending reductions. Such plan would take effect automatically unless the Legislature passes their own plan within 90 days. No such plan has been proposed to date.

The District cannot predict at this time whether there will be any reductions in and/or delays in the receipt of State aid during the District's 2017-18 fiscal year. The District believes that it would mitigate the impact of any delays or the reduction in State aid by reducing expenditures, increasing revenues, appropriating other available funds on hand, and/or by any combination of the foregoing.

Other Revenues

In addition to property taxes and State aid, the District receives other revenues from miscellaneous sources as shown in Appendix B.

TAX INFORMATION

Real Property Tax Assessments and Rates

The District derives its power to levy an *ad valorem* real property tax from the State Constitution; methods and procedures to levy, collect and enforce this tax are governed by the Real Property Tax Law. Real property assessment rolls used by the District are prepared by the towns listed in Table 6 below. Assessment valuations are determined by the town assessor and the State Board of Real Property Services, which is responsible for certain utility and railroad property. In addition, the State Board of Real Property Services annually establishes State Equalization Rates for all localities in the State, which are determined by statistical sampling of market sales/assessment studies. The equalization rates are used in the calculation and distribution of certain State aids and are used by many localities in the calculation of debt contracting and real property taxing limitations. The District is not subject to constitutional real property taxing limitations.

TABLE 6
Real Property Tax Assessments and Rates

Fiscal Year:	2014	2015	2016	2017	2018
Town of Aurora					
Assessed Value	$27,180,041	$27,665,001	$28,247,458	$28,124,798	$28,049,875
Equalization Rate (2)	0.4100	0.4000	0.4000	0.3800	0.3500
Full Value	$66,292,783	$69,162,503	$70,618,645	$74,012,626	$80,142,500
Tax Rate (1)	$44.4976	$46.5456	$45.981585	$47.734687	$51.026959

Town of Boston					
Assessed Value	$106,694,186	$107,854,005	$108,607,053	$108,298,290	$110,210,518
Equalization Rate (2)	0.9900	0.9900	0.9200	0.9200	0.8700
Full Value	$107,771,905	$108,943,439	$118,051,145	$117,715,533	$126,678,756
Tax Rate (1)	$18.4283	$18.8063	$19.991993	$19.716501	$20.528087
Town of Elma					
Assessed Value	$1,248,069	$1,250,534	$1,252,190	$1,257,088	$1,261,175
Equalization Rate (2)	0.0490	0.0470	0.0460	0.0440	0.0428
Full Value	$25,470,796	$26,607,106	$27,221,522	$28,570,182	$29,466,706
Tax Rate (1)	$372.3270	$396.1327	$399.839867	$412.254118	$417.276534
Town of Hamburg					
Assessed Value	$95,641,304	$99,985,548	$102,485,212	$101,562,728	$102,500,200
Equalization Rate (2)	0.5800	0.5660	0.5450	0.5300	0.5200
Full Value	$164,898,800	$176,652,912	$188,046,261	$191,627,789	$197,115,769
Tax Rate (1)	$31.4552	32.8944	33.747952	$34.224870	$34.345069
Town of Orchard Park					
Assessed Value	$1,384,889,366	$1,405,954,751	$1,421,033,006	$1,423,583,630	$1,437,811,418
Equalization Rate (2)	0.5700	0.5700	0.5500	0.5350	0.5200
Full Value	$2,429,630,467	$2,466,587,282	$2,583,696,375	$2,660,903,981	$2,765,021,958
Tax Rate (1)	$32.0071	$32.6636	$33.441153	$33.905012	$34.345069
Town of West Seneca					
Assessed Value	$93,655,116	$94,591,256	$96,501,805	$97,733,889	$99,282,627
Equalization Rate (2)	0.4450	0.4290	0.4200	0.4000	0.4000
Full Value	$210,460,935	$220,492,438	$229,766,202	$244,334,723	$248,206,568
Tax Rate (1)	$40.9978	$43.3992	$43.791985	$45.347953	$44.648589
Total:					
Assessed Value	$1,709,308,082	$1,737,301,095	$1,758,126,724	$1,760,560,423	$1,779,115,813
Full Value	$3,004,525,685	$3,068,445,681	$3,217,400,149	$3,317,164,834	$3,446,632,256
Tax Levy	$54,814,641	$57,129,054	$59,176,463	$60,170,654	$61,554,907

(1) Per $1,000
(2) The equalization rates shown here were used to apportion the school tax levies and may not be the same as those required for debt limit purposes.

Source: District Officials.

The State Comptroller's Fiscal Stress Monitoring System

The New York State Comptroller has reported that certain State school districts and municipalities are facing significant fiscal challenges. As a result, the Office of the State Comptroller has developed a Fiscal Stress Monitoring System ("FSMS") to provide independent, objectively measured and quantifiable information to school district and municipal officials, taxpayers and policy makers regarding the various levels of fiscal stress under which the State's school districts and municipalities are operating.

The fiscal stress scores are based on financial information submitted as part of each school district's ST-3 report filed with the State Education Department annually, and each municipality's annual report filed with the State Comptroller. Using financial indicators that include year-end fund balance, cash position and patterns of operating deficits, the system creates an overall fiscal stress score which classifies whether a school district or municipality is in "significant fiscal stress", in "moderate fiscal stress," as "susceptible to fiscal stress" or "no designation". Entities that do not accumulate the number of points that would place them in a stress category will receive a financial score but will be classified in a category of "no designation." This classification should not be interpreted to imply that the entity is completely free of fiscal stress conditions. Rather, it means that the entity's financial information, when objectively scored according to the FSMS criteria, did not generate sufficient points to place them in one of the three established stress categories.

The most current applicable report of the State Comptroller designates the District as “No Designation” (see http://www.osc.state.ny.us/localgov/fiscalmonitoring/schools/pdf/summarylist.pdf).

New York State Comptroller’s Audit

Many school districts throughout the state can be subject to an audit of the New York State Office of the Comptroller (“OSC”) pursuant to Article V, Section 1 of the State Constitution and the State Comptroller’s authority as set forth in Article 3 of the New York State General Municipal Law.

On March 28, 2014, OSC, Division of Local Government and School Accountability released an audit of the District to review selected District financial activity from July 1, 2012 through November 20, 2013. The audit found that the District needed to compare vendor pricing with the State contract list prices and develop a plan for the use of excess reserve funds.
(See www.osc.state.ny.us/localgov/audits/schools/2014/orchardpark.pdf.)

The OSC has not conducted any other audits of the District in the past five years.

Tax Limit

The State Constitution does not limit the amount that may be raised by the District-wide tax levy on real property in any fiscal year. See, however, the discussion immediately below under the sub-heading “Tax Levy Limitation Law.”

Tax Levy Limitation Law

On June 24, 2011, Chapter 97 of the Laws of 2011 was signed into law by the Governor (the “Tax Levy Limitation Law”). The Tax Levy Limitation Law applies to all local governments, including school districts (with the exception of New York City, and the counties comprising New York City). The discussion herein does not include school districts in New York City, Buffalo, Rochester, Syracuse, or Yonkers.

On June 25, 2015, Chapter 20 of the 2015 Laws of New York (“Chapter 20”) amended the Tax Levy Limitation Law to extend its expiration from June 15, 2016 to June 15, 2020. Chapter 20 also affects the calculation of tax base growth factor and exclusions available to school districts, and introduces a new real property tax rebate, as outlined below.

Prior to the enactment of the Tax Levy Limitation Law, there was no statutory limitation on the amount of real property taxes that a school district could levy as part of its budget if its budget had been approved by a simple majority of its voters. In the event the budget had been defeated by the voters, the school district was required to adopt a contingency budget. Under a contingency budget, school budget increases were limited to the lesser of four percent (4%) of the prior year’s budget or one hundred twenty percent (120%) of the consumer price index (“CPI”).

The Tax Levy Limitation Law restricts, among other things, the amount of real property taxes that may be levied by or on behalf of a school district in a particular year. Pursuant to the Tax Levy Limitation Law, the tax levy of a school district cannot increase by more than the lesser of (i) two percent (2%) or (ii) the annual increase in the CPI, over the amount of the prior year’s tax levy. Certain adjustments are permitted for taxable real property full valuation increases or changes in physical or quantity growth in the real property base as defined in Section 1220 of the Real Property Tax Law. Chapter 20 additionally allows the State Commissioner of Taxation and Finance to adjust for changes in the real property base to reflect development on tax exempt real property.

Beginning with the 2012-13 fiscal year, school districts have had to submit their proposed tax levies to the voters each year. A school district could exceed the tax levy limitation for the coming fiscal year only if the voters of such school district first approve a budget by at least 60% affirmative vote of those voting to override such limitation for such coming fiscal year only. Tax levies that do not exceed the limitation only require approval by at least a simple majority of those voting. In the event that a budget is defeated and not re-proposed, or in the event of two budget vote defeats in the same year, a school district may not levy taxes in an amount greater than the amount levied in the most recent year when a budget was approved. A school district's calculation of each fiscal year's tax levy limit is subject to review by the Commissioner of Education and the Commissioner of Taxation and Finance prior to adoption of each fiscal year's budget.

There are exceptions for school districts to the tax levy limitation provided in the Tax Levy Limitation Law, including expenditures made on account of certain tort settlements and certain increases in the average actuarial contribution rates of the New York State and Local Employees' Retirement System, and the Teachers' Retirement System. School districts are also permitted to carry forward a certain portion of their unused levy limitation from a prior year.

There is also an exception for school districts for "Capital Local Expenditures" subject to voter approval where required by law. "Capital Local Expenditures" do not include certain items for which a school district may issue debt including the payment of judgments or settled claims, including tax certiorari payments, and cashflow borrowings including tax anticipation notes, revenue anticipation notes, budget notes and deficiency notes. "Capital Local Expenditures" are defined as "the taxes associated with budgeted expenditures resulting from the financing, refinancing, acquisition, design, construction, reconstruction, rehabilitation, improvement, furnishing and equipping of or otherwise providing for school district capital facilities or school district capital equipment, including debt service and lease expenditures, and transportation capital debt service, subject to the approval of the qualified voters where required by law". The newly enacted Chapter 20 also allows the State Commissioner of Taxation and Finance to adjust the exclusion to reflect a school district's share of capital expenditures related to projects funded through a board of cooperative education services ("BOCES"); however, such regulations have not been yet promulgated as of the date of this Official Statement. The portion of the tax levy necessary to support "Capital Local Expenditures" is defined as the "Capital Tax Levy", and this is an exclusion from the tax levy limitation (except in a case when the District would be prohibited from raising the tax levy amount at all due budget vote results, as explained above).

Real Property Tax Rebate (Chapter 20)

Chapter 20 introduced a new real property tax rebate program that will provide state-financed tax rebate checks and credits to taxpayers who are eligible for the STAR exemption (see "STAR - School Tax Exemption," herein) in the years 2016-2019. Residents of New York City are not eligible for the Chapter 20 Real Property Tax Rebate. For 2016, eligible taxpayers who reside outside New York City but within the Metropolitan Commuter Transportation District ("MCTD") received $130, and eligible taxpayers who reside outside the MCTD received $185. Credits received in 2017-19 vary based on a taxpayer's personal income level and STAR tax savings.

The eligibility of real property taxpayers for the tax credit in each year depends on such jurisdiction's compliance with the provisions of the Tax Levy Limitation Law. For many taxpayers only the compliance of the school district in which the taxpayer resides is relevant. Municipal compliance with the Tax Levy Limitation Law is only required in the case of the "Big 4" cities that have fiscally dependent school districts. In such cases, the joint school/city levy must remain in compliance with the Tax Levy Limitation Law. In either scenario, the relevant jurisdiction (independent school district or joint city/school district) must certify its compliance with the provisions of the Tax Levy Limitation Law.

While the tax rebate provisions do not directly further restrict the taxing power of the affected municipalities, school districts and special districts, they do provide an incentive for such tax levies to remain within the tax cap limits established by the Tax Levy Limitation Law. The implications of this for future tax levies and for operations and services of the District are uncertain at this time.

Tax Collection Procedure

The real property taxes of the District are collected by the Town of Orchard Park (the "Town"). Such taxes are due on September 15, and may be paid without penalty through October 15. The Town pays to the District the amounts collected on a periodic basis. The penalty on unpaid taxes is 5% from October 16 to October 31 and additional 1% for each month thereafter. On or about December 1, the Town files a report of any uncollected District taxes with the County. The County thereafter on or before April pays to the District the full amount of its uncollected taxes. Thus, the full amount of the District's real property tax levy is collected by the District in the fiscal year of the levy. The County has the power to issue and sell tax anticipation notes to fund the reimbursement of uncollected taxes due to the District.

The District is not responsible for the collection of taxes of any other unit of government.

STAR - School Tax Exemption

The School Tax Relief ("STAR") program provides State-funded exemptions from school property taxes to homeowners for their primary residences. School districts are reimbursed by the State for real property taxes exempted pursuant to the STAR Program.

For the 2016-17 school levy year, homeowners subject to certain household income limitations are eligible for an enhanced exemption and basic exemption as follows:

Municipality	Enhanced Exemption	Basic Exemption
Town of Aurora	$24,890	$11,400
Town of Boston	60,260	27,600
Town of Elma	2,880	1,320
Town of Hamburg	34,720	15,900
Town of Orchard Park	35,040	16,050
Town of West Seneca	26,200	12,000

As of: 4/07/17

The enhanced or basic STAR exemption is the amount that an assessment will be reduced prior to the levy of school taxes. For example, if a home is assessed at $150,000 and the enhanced STAR exemption for a municipality is $50,000, the school taxes on the property would be paid on a taxable assessment of $100,000 ($150,000 - $50,000 = $100,000).

Since the 2011-12 school tax bills, there has been a 2% limit on STAR savings increases, the savings results from the Basic or Enhanced STAR exemptions are limited to a 2% increase over the prior year. When school districts initially calculate their tax bills, for each municipal segment they will compare the amount of STAR savings to the maximum. If the STAR savings exceeded the maximum, the school district will use the maximum when calculating tax bills for the segment.

The maximum savings for each of the municipalities for the 2016-17 fiscal year are as follows:

Municipality	Basic Maximum Savings	Enhanced Maximum Savings
Town of Aurora	$574	$1,156
Town of Boston	555	1,157
Town of Elma	580	1,178
Town of Hamburg	571	1,157
Town of Orchard Park	571	1,157
Town of West Seneca	583	1,157

As of: 07/17/2017

The District expects to receive full reimbursement of such exempt taxes from the State during the 2017-18 fiscal year.

Ten Largest Taxpayers

The following table presents the taxable valuations of the District's ten largest taxpayers on the 2017 Assessment Roll of the Town of Orchard Park used to levy 2017-18 taxes.

TABLE 7
Taxable Assessments

Taxpayer	**Nature of Business**	**Taxable Valuation** (1)	**% of Assessed Valuation**
Quaker Crossing LLC	Commercial/Retail	$13,304,450	0.75%
Young Reidman LLC	Apartments	9,933,100	0.56%
Orchard Park TK Owner LLC	Commercial/Retail	9,214,000	0.52%
National Fuel Gas Dist. Corp.	Utility	8,594,465	0.48%
New York State Electric & Gas Corp.	Utility	8,592,278	0.48%
Armor Road Properties	Nursing Homes	7,841,400	0.44%
Orchard Park Residential Partners	Apartments	7,767,300	0.44%
HCP SH ELP3 Properties	Nursing Homes	7,645,000	0.43%
Target	Retail	7,142,770	0.40%
Verizon	Utility	6,185,521	0.35%
	Totals	$86,220,284	4.85%

(1) Represents 4.85% of the District's 2017 Assessed Valuation of $1,779,115,813 used to levy 2017-18 taxes.

Source: District Officials.

DISTRICT INDEBTEDNESS

Constitutional Requirements

The State Constitution limits the power of the District (and other municipalities and school districts of the State) to issue obligations and to otherwise contract indebtedness. Such constitutional and statutory limitations include the following, in summary form, and are generally applicable to the District and the Bonds.

Purpose and Pledge. The District shall not give or loan any money or property to or in aid of any individual or private corporation or private undertaking or give or loan its credit to or in aid of any of the foregoing or any public corporation.

The District may contract indebtedness only for a District purpose and shall pledge its faith and credit for the payment of principal of and interest thereon.

Payment and Maturity. Except for certain short-term indebtedness contracted in anticipation of taxes or to be paid within three fiscal year periods, indebtedness shall be paid in annual installments commencing no later than two years after the date such indebtedness shall have been contracted and ending no later than the period of probable usefulness of the object or purpose determined by statute; no installment may be more than fifty per centum in excess of the smallest prior installment, unless the District has authorized the issuance of indebtedness having substantially level or declining annual debt service. The District is required to provide an annual appropriation for the payment of interest due during the year on its indebtedness and for the amounts required in such year for amortization and redemption of its serial bonds, bond anticipation notes and capital notes.

General. The District is further subject to constitutional limitation by the general constitutionally imposed duty on the State Legislature to restrict the power of taxation and contracting indebtedness to prevent abuses in the exercise of such power; however, as has been noted under "THE BONDS -- Nature of Obligation", the State Legislature is prohibited by a specific constitutional provision from restricting the power of the District to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted.

Statutory Procedure

In general, the State Legislature has, by the enactment of the Local Finance Law, authorized the powers and procedure for the District to borrow and incur indebtedness subject, of course, to the constitutional provisions set forth above. The power to spend money, however, generally derives from other law, including the Education Law.

The District is generally required by such laws to submit propositions for the expenditure of money for capital purposes to the qualified electors of the District. Upon approval thereby, the Board of Education may adopt a bond resolution authorizing the issuance of bonds and notes in anticipation of the bonds. With respect to certain school building construction projects, the District is not permitted to spend in excess of $100,000 until the plans and specification for such project have been approved by the Commissioner of Education of the State.

The Local Finance Law also provides a 20-day statute of limitations after publication of a bond resolution, together with a statutory form of notice which, in effect, stops legal challenges to the validity of obligations authorized by such bond resolution, except for alleged constitutional violations. The District has completed such procedure with respect to the bond resolutions pursuant to which the Bonds are being issued.

The Board, as the finance board of the District, has the power to enact tax anticipation note resolutions. Such resolutions may authorize the issuance of tax anticipation notes in an aggregate principal amount necessary to fund anticipated cash flow deficits but in no event exceeding the amount of real property taxes levied or to be levied by the District, less any tax anticipation notes previously issued and less the amount of such taxes previously received by the District.

Debt Limit. Pursuant to the Local Finance Law, the District has the power to contract indebtedness for any District purpose authorized by the Legislature of the State of New York provided the aggregate amount thereof shall not exceed ten per centum of the full valuation of taxable real estate of the District and subject to certain enumerated exclusions and deductions such as State aid for building purposes. The constitutional and statutory method for determining full valuation consists of taking the assessed valuation of taxable real estate for the last completed assessment roll and applying thereto the ratio (equalization rate) which such assessed valuation bears to the full valuation; such ratio is determined by the State Board of Real Property Services. The State Legislature is required to prescribe the manner by which such ratio shall be determined by such authority.

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Statutory Debt Limit and Net Indebtedness

The debt limit of the District is $344,663,225. This is calculated by taking 10% of the current full value of the taxable real property of the District.

TABLE 8
Statutory Debt Limit and Net Indebtedness
(As of February 28, 2018)

Town	2017 Assessed Valuation	Equalization Rate	Full Valuation
Aurora	$28,049,875	35.00%	$80,142,500
Boston	110,210,518	87.00%	126,678,756
Elma	1,261,175	4.28%	29,466,706
Hamburg	102,500,200	52.00%	197,115,769
Orchard Park	1,437,811,418	52.00%	2,765,021,958
West Seneca	99,282,627	40.00%	248,206,568
Total Full Valuation of Taxable Real Property			$3,446,632,256
Debt Limit (10% of Full Valuation)			$344,663,225
Outstanding Indebtedness (Principal Only):			
Bonds			$15,285,000
BANs			24,027,609
Gross Indebtedness			39,312,609
Less: Exclusions (1)			0
Total Net Indebtedness			$ 39,312,609
Net Debt-Contracting Margin			$ 305,350,616
Percentage of Debt-Contracting Margin Exhausted			11.41%

(1) In prior years the District received State debt service building aid in a calculated amount of approximately 70.0% of its outstanding bonded indebtedness. Given the "assumed amortization" of State building aid as provided in Chapter 383 of the Laws of 2001, no assurance can be given regarding the direct or indirect effect that "assumed amortization" will have on the net indebtedness of the District, or the timing or amount of such Building aid in connection with school facilities financed with the proceeds of the issuance of bonds or notes. See also "State Aid" herein.

Source: District Officials.

Remedies Upon Default

Section 99-b of the State Finance Law (the "SFL") provides for a covenant between the State and the purchasers and the holders and owners from time to time of the bonds and notes issued by school districts in the State for school purposes that it will not repeal, revoke or rescind the provisions of Section 99-b of the SFL, or amend or modify the same so as to limit, impair or impede the rights and remedies granted thereby.

Such section provides that in the event a holder or owner of any bond or note issued by a school district for school purposes shall file with the State Comptroller a verified statement describing such bond or note and alleging default in the payment thereof or the interest thereon or both, it shall be the duty of the State Comptroller to immediately investigate the circumstances of the alleged default and prepare and file in his office a certificate setting forth his determinations with respect thereto and to serve a copy thereof by registered mail upon the chief fiscal officer of the school district which issued the bond or note. Such investigation by the State Comptroller shall set forth a description of all such bonds and notes of the school district found to be in default and the amount of principal and interest thereon past due.

Upon the filing of such a certificate in the office of the State Comptroller, he shall thereafter deduct and withhold from the next succeeding allotment, apportionment or payment of such State aid or assistance due to such school district such amount thereof as may be required to pay (a) the school district's contribution to the State Teachers' Retirement System, and (b) the principal of and interest on such bonds and notes of such school district then in default. In the event such State aid or assistance initially so withheld shall be insufficient to pay such amounts in full, the State Comptroller shall similarly deduct and withhold from each succeeding allotment, apportionment or payment of such State aid or assistance due such school district such amount or amounts thereof as may be required to cure such default. Allotments, apportionments and payments of such State aid so deducted or withheld by the State Comptroller for the payment of principal and interest on the bonds and notes shall be forwarded promptly to the paying agent or agents for the bonds and notes in default of such school district for the sole purpose of the payment of defaulted principal of and interest on such bonds or notes. If any such successive allotments, apportionments or payment of such State aid so deducted or withheld shall be less than the amount of all principal and interest on the bonds and notes in default with respect to which the same was so deducted or withheld, then the State Comptroller shall promptly forward to each paying agent an amount in the proportion that the amount of such bonds and notes in default payable to such paying agent bears to the total amount of the principal and interest then in default on such bonds and notes of such school district. The State Comptroller shall promptly notify the chief fiscal officer of such school district of any payment or payments made to any paying agent or agents of defaulted bonds or notes pursuant to such section of the SFL.

Under current law, provision is made for contract creditors (including the holders of the Bonds) of the District to enforce payments upon such contracts, if necessary, through court action, although the present statute limits interest on the amount adjudged due to creditors to nine per centum per annum from the date due to the date of payment. As a general rule, property and funds of a municipal corporation servicing the public welfare and interest have not been judicially subjected to execution or attachment to satisfy a judgment, although judicial mandates have been issued to officials to appropriate and pay judgments out of current funds or the proceeds of a tax levy.

In recent times, certain events and legislation affecting remedies on default have resulted in litigation. While courts of final jurisdiction have upheld and sustained the rights of bondholders, such courts might hold that future events including financial crises as they may occur in the State and in municipalities of the State require the exercise by the State of its emergency and police powers to assure the continuation of essential public services.

There is in the State Constitution, Article VIII, Section 2, the following provision relating to the annual appropriation of monies for the payment of due principal of and interest on indebtedness of every county, city, town, village and school district in the State: "If at any time the respective appropriating authorities shall fail to make such appropriations, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. The fiscal officer of any county, city, town, village or school district may be required to set aside and apply such revenues as aforesaid at the suit of any holder of obligations issued for such indebtedness."

The constitutional provision providing for first revenue set asides does not apply to tax anticipation notes, revenue anticipation notes, or bond anticipation notes.

No principal or interest payment on District indebtedness is past due. The District has never defaulted in the payment of the principal of and interest on any indebtedness.

Short-Term Note Indebtedness

The District has outstanding a $22,639,874 bond anticipation note (for the financing of voter-approved capital improvements projects) that will mature on April 6, 2018 and will be redeemed and retired with proceeds of the Bonds, along with $799,879 of budgetary appropriations. In addition, the District has $1,387,735 of bond anticipation notes (for the financing of the District's share of a BOCES capital improvements project) that will mature on June 28, 2018.

Outstanding Long-Term Bond Indebtedness

The following table provides information relating to long-term bond indebtedness outstanding at year-end for the last five audited fiscal years:

TABLE 9
Outstanding Long-Term Bond Indebtedness

Fiscal Year Ending June 30:	Total Bonded Debt
2013	$27,630,000
2014	36,640,000
2015	34,075,000
2016	31,300,000
2017	18,434,000

Source: Audited Financial Statements and District Officials.

Overlapping and Underlying Debt

In addition to the District, other political subdivisions have the power to issue bonds and to levy taxes or cause taxes to be levied on taxable real property in the District. The real property taxpayers of the District are responsible for a proportionate share of outstanding debt obligations of these subdivisions. Such taxpayers' share of overlapping and underlying debt is based on the amount of the District's equalized property values taken as a percentage of each separate unit's total values. The following table presents the amount of overlapping and underlying debt and the District's share of this debt. Authorized but unissued debt has not been included.

TABLE 10
Statement of Direct and Overlapping Indebtedness

Issuer	Net Debt Outstanding	As of	District Share	Amount Applicable To District
Erie County	$ 475,089,545	09/30/2017	6.86%	$ 32,591,142
Town of Aurora	18,309,215	09/29/2017	5.20%	952,079
Town of Boston	5,947,550	09/29/2017	19.40%	1,153,825
Town of Elma	0	09/29/2017	2.19%	0
Town of Hamburg	10,280,429	09/29/2017	4.59%	471,872
Town of Orchard Park	19,875,000	09/29/2017	90.12%	17,911,350
Town of West Seneca	72,652,710	09/29/2017	7.79%	5,659,646
Total Net Overlapping Debt				58,739,914
Total Net Direct Debt				$ 39,312,609
Net Direct and Overlapping Debt				$ 98,052,523

Source: Official Statements and Annual Reports on file with the State of New York Office of the State Comptroller.

Debt Ratios

The following table presents certain debt ratios relating to the District's direct and overlapping indebtedness.

TABLE 11
Debt Ratios

	Amount	Debt Per Capita (1)	Debt to Full Value (2)
Net Direct Debt	$39,312,609	$1,229	1.14%
Net Direct and Overlapping Debt	$98,052,523	$3,064	2.84%

(1) The population of the District is currently estimated by District officials to be 32,000.
(2) The District's full value of taxable real property for fiscal year 2017-18 is $3,446,632,256.

Authorized but Unissued Indebtedness

The District has $2,081,600 of authorized but unissued indebtedness pursuant to a bond resolution that was duly adopted by the Board on March 8, 2016 for the financing of the District's share of construction of improvements and upgrades to various BOCES buildings and facilities.

Debt Service Schedule

The following table shows the debt service requirements to maturity on the District's outstanding bonded indebtedness as of March 12, 2018.

TABLE 12
Bond Principal and Interest Maturity Table

2017-18	$ 615,000	$296,838	$911,838
2018-19	3,895,000	900,838	4,795,838
2019-20	1,860,000	755,939	2,615,939
2020-21	1,755,000	609,746	2,364,746
2021-22	1,645,000	459,902	2,104,902
2022-23	825,000	315,031	1,140,031
2023-24	675,000	192,456	867,456
2024-25	845,000	118,081	963,081
2025-26	875,000	91,734	966,734
2026-27	905,000	63,356	968,356
2027-28	940,000	32,200	972,200
2028-29	450,000	7,875	457,875
	$15,285,000	$3,843,997	$19,128,997

This Table does not include $10,105,000 of refunded debt which will be called on August 1, 2018.

ECONOMIC AND DEMOGRAPHIC DATA

Population

The District estimates its population to be approximately 32,000. The following table presents population trends for the Town, County and State, based upon recent census data. Data provided in the following table is not necessarily representative of the District.

TABLE 13
Population Trend

	2000	2010	Percentage Change 00/10
Town	27,637	29,054	5.1%
County	950,265	919,040	(3.2%)
State	18,976,457	19,378,102	2.1%

Source: US Census Bureau.

Income

The following table presents median household income for the Town, County and State. Data provided in the following table is not necessarily representative of the District.

TABLE 14
Income and Wealth Statistics

	Median Household Income*	Per Capita Income*	Median Housing Value*
Town	$81,326	44,024	$199,000
County	51,050	28,512	126,700
State	58,587	32,829	283,700

*Source: US Census Bureau. *2010-2014 Average amounts, in 2014 dollars.*

Employment and Unemployment

Employment and unemployment data are not compiled for the District or the Town. The following tables provide information concerning employment and unemployment in the County and State. Data provided in the following tables is not necessarily representative of the District.

TABLE 15
Civilian Labor Force
(Thousands)

	2012	2013	2014	2015	2016
Town	15.5	15.5	15.3	15.3	15.3
County	461.4	458.1	449.3	449.2	446.6
State	9,612.2	9,623.1	9,570.7	9,591.2	9,584.5

Source: New York State Department Labor, Bureau of Labor Statistics.

TABLE 16
Yearly Average Unemployment Rates

Year	Town	County	State
2012	6.2%	8.3%	8.5%
2013	5.6%	7.4%	7.7%
2014	4.6%	6.1%	6.3%
2015	4.3%	5.4%	5.3%
2016	3.8%	4.9%	4.8%

Source: New York State Department Labor, Bureau of Labor Statistics. Information not seasonally adjusted.

TABLE 17
Monthly Unemployment Rates

Month	Town	County	State
February 2017	4.5%	5.6%	5.0%
March	4.0%	4.9%	4.4%
April	3.8%	4.8%	4.2%
May	3.7%	4.7%	4.3%
June	3.8%	5.0%	4.5%
July	4.1%	5.2%	4.9%
August	4.1%	5.1%	4.9%
September	4.0%	4.8%	4.7%
October	3.8%	4.7%	4.6%
November	4.0%	5.2%	4.5%
December	4.1%	5.2%	4.4%

Source: New York State Department Labor, Bureau of Labor Statistics. Information not seasonally adjusted.

TABLE 18
Ten Largest Employers

Name	Type of Product or Service	Approximate Number of Employees
Orchard Park Central Schools	Education	756
Erie Community College South	Education	628
McGard	Auto Part Manufacturer	413
Towne Automotive Group	Auto Retail	394
West-Herr Automotive Group	Auto Retail	393
Father Baker Manor	Long Term Health Care Facility	285
Cobham Mission Systems Division	Manufacturing	276
ITT Enidine, Inc.	Manufacturing	275
Absolut Care at Orchard Park	Long Term Health Care Facility	265
Azerty	Data Processing	260

Source: Orchard Park Chamber of Commerce.

LITIGATION

In common with other school districts, the District from time to time receives notices of claim and is party to litigation. In the opinion of the District, after consultations with its attorneys, unless otherwise set forth herein and apart from matters provided for by applicable insurance coverage, there are no claims or action pending which, if determined against the District, would have an adverse material effect on the financial condition of the District.

END OF APPENDIX A

APPENDIX B

SUMMARY OF FINANCIAL
STATEMENTS AND BUDGETS

Orchard Park Central School District
Statement of Budgeted Appropriations and Estimated Revenues
General Fund
Fiscal Year Ending June 30:

	Adopted 2016-17	Adopted 2017-18
Revenues:		
Real Property Taxes	$53,970,654	$55,354,907
STAR	6,200,000	6,200,000
Other Tax Items	696,397	695,000
Interest and Penalty	4,000	4,000
Non-Property Taxes	5,000,000	5,025,000
Charges For Services	361,000	411,000
Use of Money & Property	59,000	64,000
Miscellaneous	301,000	351,000
State Aid	25,494,742	27,212,768
Subtotal	92,086,793	95,317,675
Reserves	545,840	545,840
Appropriated Fund Balance	2,000,000	2,450,000
Total Est. Revenue and Fund Balance	$94,632,633	$98,313,515
Appropriations:		
Administrative	$8,243,659	$8,549,871
Program	72,998,263	74,804,707
Capital	13,390,711	14,959,157
Total Appropriations	$94,632,633	$98,313,735

Source: Adopted Budget of the District.

Orchard Park Central School District
Comparative Balance Sheet
General Fund
Fiscal Year Ending June 30:

	2016	2017
Assets:		
Cash and Cash Equivalent	$10,470,298	$10,265,021
Restricted Cash	5,308,334	7,171,361
Receivables	22,866	14,569
Due From Other Governments	3,434,649	3,317,437
Due from Other Funds	705,188	607,097
Deposits	0	69,874
Inventories	69,874	0
Total Assets:	$20,011,209	$21,445,359
Liabilities:		
Accounts Payable	$538,549	$558,691
Accrued Liabilities	2,140,757	2,410,433
Due to Retirement Systems	5,092,632	4,768,819
Deferred Revenue	17,907	38,195
	7,789,845	7,776,138
Fund Balances (Deficit):		
Nonspendable	69,874	69,874
Restricted	5,290,427	7,133,166
Assigned	2,177,976	2,560,443
Unassigned	4,683,087	3,905,738
Total Fund Balances	12,221,364	13,669,221
Total Liabilities and Fund Equity	$20,011,209	$21,445,359

Source: Audited Financial Statements of the District (although this summary table itself has not been audited).

Orchard Park Central School District
Statement of Revenues, Expenditures and Changes in Fund Balance
General Fund
Fiscal Year Ending June 30:

Revenues:	2013	2014	2015	2016	2017
Real Property Taxes	$47,105,801	$48,761,630	$50,905,500	$52,819,538	$54,009,206
Real Property Tax Items	6,731,239	6,722,488	6,917,671	7,055,120	6,890,357
Non-Property Tax Items	5,347,564	5,417,933	5,506,292	5,497,498	5,458,806
Charges for Services	459,525	530,951	449,783	481,250	397,404
Use of Money and Property	245,282	203,825	70,805	67,632	64,122
State Sources	20,889,510	21,217,237	22,486,490	23,064,488	25,059,417
Federal Sources	0	59,725	82,035	151,794	265,183
Miscellaneous	566,816	564,588	1,409,546	642,884	1,156,767
Total Revenues	$81,345,737	$83,478,377	$87,828,122	$89,780,204	$93,301,262
Expenditures:					
General Support	$7,257,316	$7,474,580	$7,398,187	$7,537,255	$7,846,208
Instruction	48,120,155	48,827,991	49,202,966	50,851,426	53,391,505
Pupil Transportation	4,016,299	4,227,437	3,960,483	3,918,086	4,105,883
Employee Benefits	17,751,548	19,768,000	21,062,681	20,428,555	20,996,456
Debt Service	4,926,077	4,478,069	5,054,607	4,987,482	5,308,399
Total Expenditures	$82,071,395	$84,776,077	$86,678,924	$87,722,804	$91,648,451
Excess Revenues (Expenditures)	(725,658)	(1,297,700)	1,149,198	2,057,400	1,652,811
Other Sources and (Uses):					
Operating Transfers - In	21	919,670	0	0	0
Operating Transfers - Out	(167,073)	(281,481)	(1,027,434)	(622,084)	(204,954)
Net Change in fund balances	(167,052)	638,189	(1,027,434)	(622,084)	(204,954)
Excess Revenues (Expenditures) and other sources (uses)	(892,710)	(659,511)	121,764	1,435,316	1,447,857
Fund Balance - Beg. of Fiscal Year	12,216,505	11,323,795	10,664,284	10,786,048	12,221,364
Fund Balance - End of Fiscal Year	$11,323,795	$10,664,284	$10,786,048	$12,221,364	$13,669,221

Source: Audited Financial Statements of the District (although this summary table itself has not been audited).

APPENDIX C

INDEPENDENT AUDITORS' REPORT
FOR THE FISCAL YEAR ENDED
JUNE 30, 2017

Can be accessed on the Electronic Municipal Market Access ("EMMA") website of the Municipal Securities Rulemaking Board ("MSRB") at the following link:

https://emma.msrb.org/ER1096295-ER857736-ER1258413.pdf

The audited financial statements referenced above are hereby incorporated into the attached Official Statement.

*** Such Financial Statements and opinion are intended to be representative only as of the date thereof. Drescher & Malecki LLP has not been requested by the District to further review and/or update such Financial Statements or opinion in connection with the preparation and dissemination of this Official Statement.**