

**APPROVAL UNDER SECTION 147(f) OF THE  
INTERNAL REVENUE CODE OF 1986, AS AMENDED**

**Section 1. Findings.** COLUMBUS ALF, LLC a Georgia limited liability company (the "Borrower"), wishes to finance the acquisition, of a parcel of land located at 6830 River Road, Columbus, Georgia and the renovation of the assisted living facility (the "Facility") located thereon (collectively, the "Project") which is in the jurisdiction of the area of operation of the Housing Authority of Columbus, Georgia (the "Authority"). On June 4, 2015 the Authority adopted a preliminary resolution authorizing the issuance of its revenue bonds in an amount not to exceed \$10,000,000 to be designated "Development Authority of Columbus, Georgia First Mortgage Revenue Bonds (COLUMBUS ALF, LLC Project) Series 2015 A" (the "Series 2015 Bonds") and lending the proceeds of the Series 2015 Bonds to the Borrower for the purpose of providing funds to: (i) acquire, renovate, furnish, and equip the Project, (ii) fund reserves, including a debt service reserve for the Series 2015 Bonds and (iii) pay the costs of issuance of the Series 2015 Bonds; and

**Section 2. Public Hearing Held.** After publication of a notice 14 days or more prior to the date of the hearing in the *Columbus Ledger-Enquirer*, a newspaper of general circulation in Columbus, Georgia, a public hearing was held by the Authority on July 24, 2015 regarding the Series 2015 Bonds and the Project being financed with the proceeds of the Series 2015 Bonds and a copy of the Authority Certificate showing that no objections were made at the hearing is attached hereto as Exhibit A; and

**Section 3. Disclaimer.** The Series 2015 Bonds will never constitute an indebtedness of or general obligation of the State of Georgia, the Columbus, Georgia Consolidated Government (the "Consolidated Government"), or any other political subdivision or agency of the State of Georgia, but shall be payable solely from funds paid by the Borrower and shall be secured by collateral furnished by the Borrower; and

**Section 4. Approval.** For the limited purpose of qualifying the interest on the Series 2015 Bonds for exclusion from the gross income of the owners thereof for federal income tax purposes pursuant to applicable provisions of the Code, the issuance of the Series 2015 Bonds by the Authority in an amount not to exceed \$10,000,000 and the financing of the Project with the proceeds of the Series 2015 Bonds is approved. This approval is given solely for the purpose of compliance with provisions of the Code and in no event shall this approval constitute any obligation on the part of the Consolidated Government with respect to the Series 2015 Bonds.

This the \_\_\_\_ day of July, 2015.

COLUMBUS, GEORGIA CONSOLIDATED  
GOVERNMENT

(SEAL)

By: \_\_\_\_\_  
Name: Teresa Pike Tomlinson  
Title: Mayor

ATTEST:

By: \_\_\_\_\_  
Name: Tiny B. Washington  
Title: Clerk of Council