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March 30, 2026

**Via Email**

[klatorre@seminolecountyfl.gov](mailto:klatorre@seminolecountyfl.gov)

Kate Latorre  
County Attorney  
Seminole County, FL  
1101 East 1st Street STE 3030  
Sanford, FL 32771

Re: Request for Host Jurisdiction Public Hearing and Approval under Section 147(f) of the Internal Revenue Code Regarding Tax-Exempt Bonds for Lifespace Communities, Inc. (Village on the Green)

Dear Ms. Latorre:

We are serving as bond counsel for a tax-exempt bond financing on behalf of Lifespace Communities, Inc., an Iowa nonprofit corporation. Lifespace has requested that the Board of County Commissioners or its designee (Nelson Mullins Riley & Scarborough LLP) hold a public hearing in accordance with the requirements of Section 147(f) of the Internal Revenue Code with respect to a proposed issuance of tax-exempt bonds to finance and refinance improvements to Village on the Green in Longwood, Florida, which is a continuing care retirement community located in Seminole County that is owned and operated by Lifespace. This letter summarizes the proposed project and the reasons for the requested Tefra hearing.

Lifespace directly or through subsidiaries owns and operates 15 continuing care retirement communities in seven states, including Village on the Green. The requested host Tefra hearing relates to the proposed bond issues to finance certain additional capital improvements to that campus. The estimated construction budget for the new projects at Village on the Green is not expected to exceed \$110,000,000. In 2018, 2021, 2022 and 2024, the County held public hearings for improvements to the Village on the Green campus relating to bond issues in 2018, 2019, 2021, 2023 and 2024.

Lifespace requests your assistance in providing “host approval” under Section 147(f) of the Internal Revenue Code in connection with the proposed issuance of tax-exempt revenue bonds by the Palm Beach County Health Facilities Authority (“PBCHFA”) pursuant to Chapter 154, Part III, and Chapter 159, Part II, Florida Statutes for the benefit of Lifespace Communities and Village on the Green.

Seminole County and PBCHFA have previously entered into an Interlocal Agreement dated October 11, 2016, pursuant to which PBCHFA has previously issued revenue bonds on behalf of Lifespace to finance and refinance improvements to the Village on the Green community in Seminole County. PBCHFA anticipates issuing additional revenue bonds on behalf of Lifespace in the aggregate principal amount not to exceed \$325,000,000 to finance and refinance additional improvements to certain Florida communities owned and operated by Lifespace, including improvements to Village on the Green.

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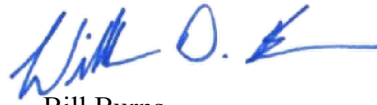
Section 147(f) of the Internal Revenue Code requires that the PBCHFA obtain the approval of the governing body or chief elected representative of the state or local government jurisdiction in which the financed facilities are to be located following a public hearing. The public hearing can be held by the Board of County Commissioners or its designee after publication of a notice of the hearing in a newspaper serving the area where the project is located. We have prepared the form of notice and coordinated with your Bond Counsel the publication of the notice in the local newspaper.

As reflected in the draft resolution approving the Tefra hearing, the approval by the Board of County Commissioners does not obligate the County to incur any liability, pecuniary or otherwise, in connection with either the issuance of the Bonds or the financing or refinancing of the project.

If you have any questions concerning the project or the requested host Tefra hearing, please contact me at 816-218-7562.

Thank you for your assistance to date in this process.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Bill O. Burns", with a stylized flourish at the end.

Bill Burns

cc: Joseph Stanton  
John Flanigan  
David Grossklaus