

March 12, 2026

Albany County Pine Hills Land Authority
111 Washington Avenue, Suite 100
Albany, NY 12207

Dear Board of Directors:

Public Authorities, which are authorized under the Not-for-Profit Corporation Law fall under the Public Authorities Accountability Act (PAAA) and Public Authorities Reform Act (PARA) definition if they are affiliated with, sponsored by, or created by a municipal government.

One of the specific requirements of the PAL is Section 2925, subdivision 6 that indicates:

“Each corporation shall annually prepare and approve an investment report which shall include the investment guidelines, as specified in subdivision three of this section, amendments to such guidelines since the last investment report, an explanation of the investment guidelines and amendments, the results of the annual independent audit, the investment income record of the corporation and a list of the total fees, commissions, or other charges paid to each investment banker, broker, dealer, agent, dealer and adviser rendering investment associated services to the corporation since the last investment report. Such investment report may be a part of any other annual report that the corporation is required to make.”

In discussions with the ABO, they have indicated that the annual financial statement audit does not satisfy the requirement above. Furthermore, the requirement extends to not only investments in the conventional sense, but all funds available for deposit in the organization, except for traditional checking and savings type deposits, or trustee directed investments in association with bond issuances. Certificates of deposits would qualify as investments under the regulations.

The complexity of the audit is based primarily on the nature of the organization's investments. Organizations with certificates of deposit or other non-complex investments may be able satisfy the requirements by having an agreed-upon procedures review of its investment policy performed to ensure that the organization is in compliance with said policy.

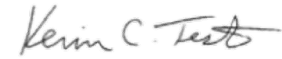
In connection with the issuance of its outstanding bonds, Albany County Pine Hills Land Authority (the Organization) is required under the terms of the bond indenture to maintain a Debt Service Reserve Fund equal to the maximum annual debt service on the bonds (or as otherwise defined in the bond agreement). Amounts held in the Debt Service Reserve Fund are restricted and may only be used for the payment of principal and interest on the bonds in the event of a debt service deficiency. At December 31, 2025, approximately \$4.1 million were invested in U.S. Government securities to satisfy this requirement associated with the Organization's bond issuance.

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Since the Albany County Pine Hills Land Authority only maintains deposits held in a debt service fund and do not have investments that meet the criteria as defined above, there is no audit requirement for December 31, 2025.

Very truly yours,

A handwritten signature in black ink that reads "Kevin C. Testo". The signature is written in a cursive style with a horizontal line extending from the end.

Kevin C. Testo, CPA