

BULLETIN BOARD
AFFIDAVIT OF POSTING
OF NOTICE OF PUBLIC HEARING
ON PROPOSED PROJECT
AND FINANCIAL ASSISTANCE
RELATING THERETO

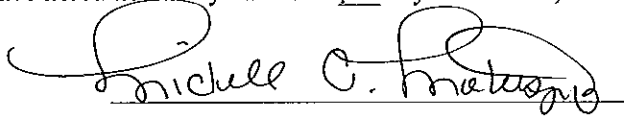
STATE OF NEW YORK)
) SS.:
COUNTY OF ALBANY)

The undersigned, being duly sworn, hereby states:

1. That on October 11, 2019, I posted a copy of a notice of public hearing entitled "Notice of Public Hearing on Proposed Project and Financial Assistance Relating Thereto" (the "Notice of Hearing") relating to the proposed Wildwood Programs, Inc. Project to be undertaken by Albany County Capital Resource Corporation (the "Agency") for the benefit of Wildwood Programs, Inc. (the "Company") on a public bulletin board at the Town of Colonie Public Operations Center located at 347 Old Niskayuna Road in the Town of Colonie, Albany County.


2. That the Notice of Hearing attached hereto as Exhibit A is a duplicate copy of the Notice of Hearing which was posted on such bulletin board.

IN WITNESS WHEREOF, I have hereunto set my hand this 11 day of October, 2019.



Mitchell C. Metzger

Sworn to before me this
11th day of October, 2019.



Notary Public

LYNN D. GALLANT
Notary Public, State of New York
Qualified in Albany County
Reg. No. 01GA6155138
Commission Expires Nov. 06, 2022

NOTICE OF PUBLIC HEARING
ON PROPOSED PROJECT
AND FINANCIAL ASSISTANCE
RELATING THERETO

Notice is hereby given by the Albany County Capital Resource Corporation (the "Issuer") that a public hearing pursuant to Section 147(f) of the Internal Revenue Code of 1986, as amended (the "Code"), and, as required by the Issuer's certificate of incorporation, Section 859-a of the General Municipal Law of the State of New York, has been scheduled and will be held by the Issuer on the 30th day of October, 2019 at 7:00 o'clock p.m., local time, at the Town of Colonie Public Operations Center located at 347 Old Niskayuna Road in the Town of Colonie, Albany County, New York in connection with the following matters:

Wildwood Programs, Inc., a New York not-for-profit corporation (the "Borrower"), submitted an application (the "Application") to the Issuer, a copy of which Application is on file at the office of the Issuer, which Application requested that the Issuer consider undertaking a project (the "Project") for the benefit of the Borrower, said Project consisting of the following: (A) the refinancing of the Albany County Industrial Development Agency Civic Facility Revenue Bonds (Special Needs Facilities Pooled Program), Series 2006K-1 issued on June 15, 2006 in the aggregate principal amount of \$3,550,000 (the "Prior Bonds"), which Prior Bonds were issued to finance (1) the acquisition of an interest in a parcel of land containing approximately 1.07 acres located at 1190 Troy-Schenectady Road in the Town of Colonie, Albany County, New York (the "Land"), together with the existing building located thereon containing approximately 32,670 square feet of space (the "Existing Facility"), (2) the reconstruction and renovation of portions of the Existing Facility, and (3) the acquisition and installation thereon and therein of various machinery and equipment; (B) (1) the reconstruction and renovation of portions of the Existing Facility and (2) the acquisition and installation thereon and therein of machinery and equipment (the "Equipment") (the Land, the Existing Facility and the Equipment being hereinafter collectively referred to as the "Project Facility"), all of the foregoing to constitute an educational, training and administrative facility and other directly and indirectly related activities for use by the Borrower; (C) the financing of all or a portion of the costs of the foregoing by the issuance of tax-exempt and/or taxable revenue bonds of the Issuer in one or more issues or series in an aggregate principal amount sufficient to pay the cost of undertaking the Project, together with necessary incidental costs in connection therewith, presently estimated to not exceed \$2,810,000 and in any event not to exceed \$5,000,000 (the "Obligations"); (D) the paying a portion of the costs incidental to the issuance of the Obligations, including issuance costs of the Obligations and any reserve funds as may be necessary to secure the Obligations; and (E) the making of a loan (the "Loan") of the proceeds of the Obligations to the Borrower or such other person as may be designated by the Borrower and agreed upon by the Issuer.

The Issuer is considering whether (A) to undertake the Project, (B) to finance the Project by issuing, from time to time, the Obligations, (C) to use the proceeds of the Obligations to pay the cost of undertaking the Project, together with necessary incidental costs in connection therewith, and (D) to provide certain exemptions from taxation with respect to the Project, including exemption from mortgage recording taxes with respect to any documents, if any, recorded by the Issuer with respect to the Project in the office of the County Clerk of Albany County, New York or elsewhere.

If the issuance of the Obligations is approved, with respect to any portion of the Obligations to be intended to be issued as federally tax-exempt obligations, the interest on such portion of the Obligations will not be excludable from gross income for federal income tax purposes unless (A) pursuant to Section 147(f) of the Code and the regulations of the United States Treasury Department thereunder (the "Treasury Regulations"), the issuance of the Obligations is approved by the County Executive of Albany County, New York after the Issuer has held a public hearing on the nature and location of the Project

Facility and the issuance of the Obligations; and (B) pursuant to Section 145(a) of the Code, all property which is to be provided by the net proceeds of the Obligations is to be owned by a Section 501(c)(3) organization or a governmental unit and at least ninety-five percent (95%) of the net proceeds of the Obligations are used with respect to (1) governmental units and/or (2) the activities of Section 501(c)(3) organizations which do not constitute “unrelated trades or businesses” (as defined in Section 513(a) of the Code) with respect to such Section 501(c)(3) organizations.

If the Issuer determines to proceed with the Project and the issuance of the Obligations, (A) the proceeds of the Obligations will be loaned by the Issuer to the Company pursuant to a loan agreement (the “Agreement”) requiring that the Company or its designee make payments equal to debt service on the Obligations and make certain other payments to the Issuer and (B) the Obligations will be a special obligation of the Issuer payable solely out of certain of the proceeds of the Agreement and certain other assets of the Issuer pledged to the repayment of the Obligations. THE OBLIGATIONS SHALL NOT BE A DEBT OF THE STATE OF NEW YORK OR ALBANY COUNTY, NEW YORK, AND NEITHER THE STATE OF NEW YORK NOR ALBANY COUNTY, NEW YORK SHALL BE LIABLE THEREON.

The Issuer has not yet made a determination pursuant to Article 8 of the Environmental Conservation Law (the “SEQR Act”) regarding the potential environmental impact of the Project.

The Issuer will at said time and place hear all persons with views on the location and nature of the proposed Project Facility, the financial assistance being contemplated by the Issuer in connection with the proposed Project or the proposed plan of financing the proposed Project by the issuance from time to time of the Obligations. A copy of the Application filed by the Company with the Issuer with respect to the Project, including an analysis of the costs and benefits of the Project, is available for public inspection during business hours at the offices of the Issuer. A transcript or summary report of the hearing will be made available to the members of the board of directors of the Issuer and to the County Executive of Albany County, New York. Approval of the issuance of the Obligations by Albany County, New York, acting through its elected County Executive, is necessary in order for the interest on the Obligations to qualify for exemption from federal income taxation.

Additional information can be obtained from, and written comments may be addressed to: Hon. Gary Domalewicz, Chairman, Albany County Capital Resource Corporation, 112 State Street, Room 740, Albany, New York 12207.

Dated: October 11, 2019.

ALBANY COUNTY CAPITAL
RESOURCE CORPORATION

BY: s/ Hon. Gary Domalewicz
Chairman