


April 19, 2023

TO: Members of the Board of Trustees

FROM: Jeffrey P. Geoghegan, CPA   
Executive Vice President for Finance and Chief Financial Officer

RE: Declaration of Official Intent For Certain UCONN 2000 Projects to be Reimbursed  
with UCONN 2000 Debt Proceeds at a Future Date

RECOMMENDATION:

That the Board of Trustees approve the resolution for the Declaration of Official Intent for certain UCONN 2000 projects to be reimbursed with UCONN 2000 debt proceeds at a future date.

BACKGROUND:

The attached resolution is a declaration of official intent made pursuant to Section 1.150-2 of the Internal Revenue Service Regulations.

The University plans to incur expenditures in connection with the UCONN 2000 project "Residential Life Facilities-South Campus Residence Hall" as listed along with the estimated costs in the attached Resolution and Exhibit A attached hereto and to reimburse itself later when UCONN 2000 bonds or other tax-exempt obligations are issued. In order to satisfy the Internal Revenue Service Regulations and be able to reimburse expenditures with the proceeds of tax-exempt debt, the issuer of tax-exempt debt must, among other things, declare not later than sixty (60) days after the date of such expenditure, a reasonable official intent to so reimburse.

At this time the University reasonably expects to reimburse itself for the cost of expenditures with respect to the projects with the proceeds of UCONN 2000 Bonds or other tax-exempt obligations to be issued by the University, not later than eighteen (18) months after the later of the date the original expenditure is paid or the date the project is placed in service or abandoned, but in no event more than three (3) years after the original expenditure is paid. The maximum principal amount of such debt with respect to the projects is not expected to exceed \$215,000,000. This declaration of official intent is a declaration of official intent made pursuant to Section 1.150-2 of the Regulations.

**UNIVERSITY OF CONNECTICUT BOARD OF TRUSTEES**

**RESOLUTION  
TO MAKE DECLARATION OF OFFICIAL INTENT  
FOR REIMBURSEMENT BONDS**

**WHEREAS**, the Internal Revenue Service has promulgated regulations (the “Regulations”) under the Internal Revenue Code of 1986, as amended (the “Code”) that govern the allocation of the proceeds of tax-exempt debt issued to reimburse certain types of expenditures, as described in the Regulations, paid by a borrower of tax-exempt debt, prior to the issuance of such debt; and

**WHEREAS**, such Regulations set forth the circumstances under which allocations of proceeds to reimburse such prior expenditures shall be treated as an expenditure of proceeds on the date of such allocations; and

**WHEREAS**, generally, in order to satisfy the Regulations and be able to reimburse expenditures (except for certain de minimis expenditures and preliminary costs as defined in the Regulations) with the proceeds of tax-exempt debt, the issuer of tax-exempt debt must, among other things, declare not later than sixty (60) days after the date of such expenditure, a reasonable official intent to so reimburse; and

**WHEREAS**, the purpose of this official intent requirement is to provide objective evidence that on the date of this declaration, the issuer intended to reimburse the expenditure; and

**WHEREAS**, the University of Connecticut (the “University”) intends to issue its bonds to finance the projects as set forth in **Exhibit A** under the UConn 2000 Act.

**NOW THEREFORE**, be it resolved that the University declares its official intent as follows:

1. The University reasonably expects to incur expenditures (the “Expenditures”) in connection with the project of which a general functional description is contained in **Exhibit A** attached hereto (the “Project”).

2. The University reasonably expects to reimburse itself for the cost of Expenditures with respect to the Project with the proceeds of tax-exempt debt to be issued by the University within eighteen (18) months after the date of any Expenditure or the date the Project was placed in service or abandoned, whichever is later, but in no event more than 3 years after an Expenditure is paid. The maximum principal amount of such debt with respect to the Project is not expected to exceed the amount as set forth in **Exhibit A**.

3. This declaration of official intent is a declaration of official intent made pursuant to Section 1.150-2 of the Regulations.

**EXHIBIT A**

The University reasonably expects to reimburse itself for the cost of Expenditures with respect to the following project from the proceeds of tax-exempt borrowings of the University in an amount not to exceed the amount as set forth below.

<u>Project</u>	<u>Cost</u>
Residential Life Facilities-South Campus Residence Hall, including the design, construction and furnishing of, as well as site work and related infrastructure for a new residence hall located at South Campus.	\$215,000,000