

NOTICE OF PUBLIC HEARING

For the purposes of Section 147(f) of the Internal Revenue Code of 1986, as amended (the "Code"), notice is hereby given that the Florida Local Government Finance Commission (the "Issuer") will hold a public hearing on July 20, 2026, at 10:00 A.M. prevailing Eastern Time, or as soon thereafter as practicable. In accordance with Internal Revenue Service Revenue Procedure 2022-20, this public hearing will be held by telephone conference. Interested persons are encouraged to attend the telephone conference using the following instructions:

TELEPHONE CONFERENCE INSTRUCTIONS:

TOLL-FREE DIAL IN NUMBER: **1 (877) 304-9269**

PASSCODE: **359237#**

The public hearing is being conducted for the purpose of receiving comments and hearing discussion concerning the proposed adoption by the Issuer of a resolution providing for the preliminary approval of the issuance by the Issuer of not exceeding \$50,000,000 of its Revenue Bond Anticipation Notes (Fleet Landing Riverside Project), from time to time in one or more series of tax-exempt and/or taxable revenue bond anticipation notes as qualified 501(c)(3) bonds, as defined in Section 145 of the Code (collectively, the "Notes"), pursuant to a plan of finance.

The proceeds of the Notes will be loaned to SMLPC, LLC, a Florida limited liability company, and its affiliates (the "Borrower"). The sole member of the Borrower is Polaris Endeavors, Inc., a Florida not-for-profit corporation and an organization described in Section 501(c)(3) of the Code. The Borrower will use the proceeds of the Notes to: (i) finance and refinance (including through reimbursement) certain pre-construction development costs related to acquiring, constructing and equipping a continuing care retirement facility, including independent living apartments, assisted living units and memory care units, administrative and common areas, parking and ancillary facilities and equipment, and the approximately 7.4 acre site therefor located on the east side of Riverside Avenue at its intersection with Stonewall Street, generally at 111 Riverside Avenue and 0 Riverside Avenue in Jacksonville, Duval County, Florida 32202 (the "Project"); (ii) fund any necessary reserves; and (iii) pay costs associated with the issuance of the Notes.

The Project will be owned by the Borrower and will be operated by the Borrower or an entity or entities affiliated with or designated by the Borrower pursuant to one or more qualified use or management agreements.

The Notes shall be payable solely from the proceeds of one or more series of revenue bonds if and when issued in the future. Such Notes and the accreted interest thereon shall not constitute an indebtedness or pledge of the general credit or taxing power, if any, of the Issuer, Brevard County, Charlotte County, Lee County, Osceola County, Sarasota County,

St. Johns County, the State of Florida, or any political subdivision or agency thereof, including the City of Jacksonville, Florida. The Issuer has no taxing power.

Issuance of the Notes shall be subject to several conditions including satisfactory documentation, the approval by bond counsel as to the tax-exempt status of the interest on all or a portion of the Notes and receipt of necessary approvals for the financing. The aforementioned hearing shall be a public hearing and all persons in attendance will be given an opportunity to be heard and to express their views on the proposed issuance of the Notes and the location and nature of the Project by accessing the telephone conference as indicated above. Written comments may also be submitted prior to the hearing to the Florida Local Government Finance Commission c/o Nabors Giblin & Nickerson, P.A. at 2502 N. Rocky Point Drive, Suite 1060, Tampa, Florida 33607, directed to Issuer's Counsel or via email sent to the following email address: rharb@ngn-tampa.com. Comments made at the hearing are for the consideration of the party(ies) providing an approval of the Notes but will not bind the Issuer or such party(ies) as to any action it may take.

ALL PERSONS FOR OR AGAINST SAID APPROVAL CAN BE HEARD AT SAID TIME AND PLACE. IF A PERSON DECIDES TO APPEAL ANY DECISION MADE BY THE ISSUER WITH RESPECT TO SUCH HEARING OR MEETING, (S)HE WILL NEED TO ENSURE THAT A VERBATIM RECORD OF SUCH HEARING OR MEETING IS MADE (AT THEIR SOLE COST AND EXPENSE), WHICH RECORD INCLUDES THE TESTIMONY AND EVIDENCE UPON WHICH THE APPEAL IS BASED.

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in the meeting is requested to advise the Issuer at least twenty-four (24) hours prior to the meeting by contacting counsel to the Issuer at (813) 281-2222 or via email sent to the following email address: rharb@ngn-tampa.com.

By order of the Florida Local Government Finance Commission.

**FLORIDA LOCAL GOVERNMENT
FINANCE COMMISSION**

/s/ Nicole Jovanovski

Chair