

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 10:15 A.M., 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 approving the issuance and sale by the Issuer of not exceeding \$97,000,000 of its Florida Local Government Finance Commission Health Care Facilities Revenue Bonds (Brooks Rehabilitation Projects) to be issued in one or more series of qualified 501(c)(3) bonds, as defined in Section 145 of the Code (collectively, the "Bonds"), pursuant to a plan of finance.

The proceeds of the Bonds, when and if issued, will be loaned to Genesis Health, Inc. (together with its affiliates, the "Borrower"), a Florida not-for-profit corporation and an organization described under Section 501(c)(3) of the Code. The proceeds will be used by the Borrower for the purposes of: (a) financing and refinancing (including through reimbursement) all or a portion of the costs of various capital expenditures described below (the "Project"); (b) funding necessary reserves and capitalized interest related to the Bonds, if deemed necessary or desirable; and (c) paying certain costs of issuance associated with the Bonds.

The Project to be financed and refinanced with the proceeds of the Bonds includes the cost of acquiring, constructing, equipping, and/or improving the health care facilities of the Borrower, including land and rights in land, located at:

(i) 8400 Brooks Bartram Dr., Jacksonville, Duval County, Florida 32258 (anticipated to be allocated a maximum aggregate principal amount of \$70,000,000 of the Bonds);

(ii) 8207 Beach Blvd., Jacksonville, Duval County, Florida 32216 (anticipated to be allocated a maximum aggregate principal amount of \$25,000,000 of the Bonds);

(iii) an approximately 12-acre undeveloped parcel situated on the east side of San Pablo Pkwy., north of the intersection of San Pablo Pkwy. and Crosswater Blvd. and south of the intersection of Sam Yopez Rd. (Parcel ID# 167452 0400), Jacksonville, Duval County, Florida 32224 (anticipated to be allocated a maximum aggregate principal amount of \$12,000,000 of the Bonds);

(iv) 3599 University Blvd., S., Jacksonville, Duval County, Florida 32216 (anticipated to be allocated a maximum aggregate principal amount of \$10,000,000 of the Bonds);

(v) 6210 Beach Blvd., Jacksonville, Duval County, Florida 32216 (anticipated to be allocated a maximum aggregate principal amount of \$10,000,000 of the Bonds);

(vi) 8200 Brooks Bartram Dr., Jacksonville, Duval County, Florida 32258 (anticipated to be allocated a maximum aggregate principal amount of \$10,000,000 of the Bonds); and

(vii) 2700 University Blvd., S., Jacksonville, Duval County, Florida 32217 (anticipated to be allocated a maximum aggregate principal amount of \$10,000,000 of the Bonds).

The Project will be owned by the Borrower and will continue to be operated as a system of health care facilities by the Borrower (or an entity or entities affiliated with or designated thereby pursuant to one or more qualified use or management agreements).

The Bonds shall be payable solely from the revenues derived by the Issuer from a loan agreement and other financing documents entered into by and between the Issuer and the Borrower prior to or contemporaneously with the issuance of the Bonds. Such Bonds and the 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 Duval County). The Issuer has no taxing power.

Issuance of the Bonds 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 Bonds 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 Bonds 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 Bonds 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