

**NOTICE OF PUBLIC HEARING WITH RESPECT TO A PROPOSED  
TAX-EXEMPT LOAN FINANCING BY THE  
COLORADO EDUCATIONAL AND CULTURAL FACILITIES AUTHORITY  
FOR YESHIVAT HE'ATID A NEW JERSEY NONPROFIT CORPORATION**

NOTICE IS HEREBY GIVEN that the Colorado Educational and Cultural Facilities Authority (the "Authority") will conduct a public hearing concerning the approval of the proposed issuance of its Tax-Exempt Loan (JFed Financing Solutions - Yeshivat He'Atid), Series Z-2 (the "Authority Loan") pursuant to a plan of finance (the Financing"), in one or more issuances of series, in an aggregate stated principal amount not to exceed \$5,000,000. All or a portion of the Authority Loan is expected to be issued as a qualified 501(c)(3) bond as defined in Section 145 of the Internal Revenue Code of 1986, as amended (the "Code"). The hearing will be conducted via publicly available conference call on June 11, 2021 at 10:00 a.m. Mountain Time.

Pursuant to such Financing, the proceeds of the Authority Loan will be loaned by the Authority to Yeshivat He'Atid A New Jersey nonprofit corporation (the "Borrower"), to finance a plan of finance comprised of the following elements: (i) the expansion, construction, renovation, furnishing and equipping of Yeshivat He'Atid day school, and other capital improvements at, the Borrower's educational facility located at 1500 Queen Anne Road, Teaneck, New Jersey 07666 and 1480 Palisades Avenue, Teaneck, New Jersey 07666 (the "Existing Educational Facility"), including but not limited to, the construction and equipping of a gymnasium and classrooms (the "New Money Project"); (ii) refinancing existing debt which financed the acquisition, construction, renovation, furnishing and equipping of the Existing Educational Facility (the "Refunding Project"); (iii) financing certain working capital; (iv) financing certain capitalized interest on the Authority Loan; and (v) financing costs of issuing the Authority Loan (collectively, together with the Refunding Project, the "Project"). The initial owner and principal user of the tax-exempt financed facilities will be the Borrower. The maximum stated principal amount allocable to the New Money Project will not exceed \$3,500,000, and the maximum stated principal amount allocable to the Refunding Project will not exceed \$1,500,000.

The Authority Loan is not a general obligation of the Authority. The Authority Loan and the interest thereon shall never constitute the debt or indebtedness of the Authority, the State of Colorado (the "State") or any political subdivision thereof within the meaning of any provision of the Constitution and laws of the State and shall not constitute nor give rise to a pecuniary liability or a charge against the general credit or taxing powers of the Authority or the State.

Due to the COVID-19 public health emergency, in person participation at the hearing has been suspended. However, in compliance with IRS Rev. Proc. 2020-21, as extended by IRS Rev. Proc. 2020-49, interested persons are invited to attend the public hearing by publicly available conference call and present comments regarding the Project and the Financing. To attend the via conference call, dial 866-704-7500 (toll-free) and when prompted enter passcode 612390#. All those who are on the conference call will have the opportunity to offer their comments and concerns. Written comments to be presented at the public hearing may be emailed to the Authority at the following email: [mheller@cecfa.org](mailto:mheller@cecfa.org).

This notice is intended to comply with the public notice requirements of Section 147(f) of the Internal Revenue Code of 1986, as amended.

COLORADO EDUCATIONAL AND  
CULTURAL FACILITIES AUTHORITY

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