

December 6, 2021

**Via Hand Delivery**

Ms. Tonya Grier  
Clerk to the Commission  
Fulton County Board of Commissioners  
141 Pryor Street, S.W.  
Atlanta, Georgia 30303

Re: Development Authority of Fulton County – TUFF/Atlanta Housing, LLC

Dear Ms. Grier:

As attorney for the Development Authority of Fulton County (the “Issuer”), I am enclosing herewith for the signature of Chairman Pitts four copies of the TEFRA certificate, with attached standard supporting documentation, pertaining to the proposed issuance of its Development Authority of Fulton County Revenue Bonds (TUFF/Atlanta Housing, LLC – Georgia State University Project) Series 2022, in an amount not to exceed \$25,000,000 (the “Bonds”). The Bonds will be issued for the benefit of TUFF/Atlanta Housing, LLC, a Georgia limited liability company, or an affiliate thereof (the “Borrower”), for the purposes of (a) refunding all of the Issuer’s Revenue Bonds (TUFF/Atlanta Housing, LLC Project – Georgia State University Project), Series 2011, originally issued in the aggregate principal amount of \$33,115,000, the proceeds of which were used to refund and defease all of the Issuer’s Revenue Bonds (TUFF/Atlanta Housing, LLC Project at Georgia State University Project), Series 2001A, which were used to finance the costs of the acquisition, construction and equipping of student housing facilities consisting of approximately 231 units, related parking facilities and appurtenant and related facilities for students of Georgia State University (the “University”) on the University campus; and (b) paying all or a portion of the costs of issuing the Bonds. The Borrower’s facilities refinanced by the Bonds will be owned by the Borrower and operated by the University and the facilities are located at 135 Edgewood Avenue, Atlanta, Georgia 30303, in Fulton County, Georgia.

Please note that the Borrower commits to comply with the Issuer’s Minority and Female Business Enterprises Policy which was revised April 22, 2008, in accordance with the Fulton County Board of Commissioners Resolution adopted April 2, 2008, however, since this is a refinancing of existing debt, no new construction is anticipated for the project.

If you or Chairman Pitts have any questions, please call me. Otherwise, please ask Chairman Pitts to execute the enclosed certificates at his earliest opportunity, and please then

**Arnall  
Golden  
Gregory** LLP

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return at least three executed certificates with supporting documentation to me at your earliest opportunity for further processing.

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Thank you for your cooperation in this matter.

Sincerely,



Sandra Z. Zayac

SZZ

Enclosures

cc: Mr. Richard Anderson (w/o encl.)  
County Manager  
cc: Ms. Y. Soo Jo  
County Attorney

**CERTIFICATE OF CHAIRMAN OF FULTON COUNTY BOARD OF  
COMMISSIONERS REGARDING PUBLIC APPROVAL FOR DEVELOPMENT  
AUTHORITY OF FULTON COUNTY  
REVENUE BOND FINANCING FOR  
TUFF/ATLANTA HOUSING, LLC**

The undersigned is the Chairman of the Fulton County Board of Commissioners, and as such is the designated chief elected executive official of Fulton County. TUFF/Atlanta Housing, LLC, a Georgia limited liability company (the "Company") proposes to (a) refund all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project – Georgia State University Project), Series 2011, originally issued in the aggregate principal amount of \$33,115,000, the proceeds of which were used to refund and defease all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project at Georgia State University Project), Series 2001A, which were used to finance the costs of the acquisition, construction and equipping of student housing facilities consisting of approximately 231 units, related parking facilities and appurtenant and related facilities for students of Georgia State University (the "University"), located at 135 Edgewood Avenue, Atlanta, Georgia, on the University campus; and (b) pay all or a portion of the costs of issuing the Bonds (collectively, the "Project").

The Project is to be financed or refinanced from the proceeds of the Bonds. The initial owner, operator or manager of the facilities financed or refinanced by the Bonds will be the Company. The facilities financed or refinanced by the Bonds are located in Fulton County.

On November 24, 2021, notice of the public hearing (the "Notice") was published on the website of the Development Authority of Fulton County. The Notice was designed to apprise residents of Fulton County of the proposed issuance of the Bonds by the Issuer and was published not less than 7 days before the scheduled date of the public hearing referred to in the Notice. A copy of the Publisher's Affidavit including a copy of the Notice is attached as Exhibit "A" to the Certification of Hearing Officer (the "Certification") dated December 6, 2021, which is attached hereto.

On December 6, 2021, a public hearing (the "Hearing") with regard to the issuance of the Bonds was held at 11:30 a.m. via teleconference in accordance with Revenue Procedure 2021-39 due to the COVID-19 pandemic. The Hearing was accessible to the residents of the approving governmental unit by calling a toll-free telephone number. The public was invited to join by dialing 1-646-876-9923 (Meeting ID: 843 4115 7822#). The Hearing was conducted in a manner that provided a reasonable opportunity for persons with differing views on both the issuance of the Bonds and the location and nature of the Project to be heard, as evidenced by the Certification, which is attached hereto.

The proceedings have been reviewed and determination made that the issuance of the Bonds is legally proper and a placement/investment letter and a Minority and Female Business Enterprise Policy ("MFBE") Utilization Report has been received, as evidenced by the Exhibits "C", "D" and "E", respectively, to the Certification, which is attached hereto.

[Intentionally left blank]

Based on the foregoing, the undersigned duly approves the issuance of the Bonds as contemplated by the Notice for the purpose of financing or refinancing the Project for the Company. This approval is solely intended to comply with the provisions of Section 147(f) of the Internal Revenue Code of 1986, as amended, and shall not result in or impose any pecuniary liability upon or constitute a lien upon the property or a claim against the Fulton County, the State of Georgia, or a political subdivision thereof.

This 21<sup>st</sup> day of December, 2021.



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Robert L. Pitts  
Chairman, Board of Commissioners of  
Fulton County, Georgia

Approved as to form:



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Attorney

**CERTIFICATION  
RELATIVE TO THE ISSUANCE OF  
DEVELOPMENT AUTHORITY OF FULTON COUNTY  
REVENUE BOND FINANCING  
(TUFF/ATLANTA HOUSING, LLC)**

WHEREAS, the DEVELOPMENT AUTHORITY OF FULTON COUNTY (the “Issuer”) is considering adoption of or has adopted a Resolution (the “Resolution”) providing for the issuance of Development Authority of Fulton County Revenue Bonds (TUFF/Atlanta Housing, LLC – Georgia State University Project), Series 2022, in an amount not to exceed \$25,000,000 (the “Bonds”); and

WHEREAS, prior to the adoption of the Resolution, notice of public hearing (the “Notice”) was published on November 24, 2021 on the website of the Issuer, as evidenced by the copy of Publisher's Affidavit including a copy of the Notice attached hereto as Exhibit “A”. The Notice was designed to apprise residents of Fulton County of the proposed issuance of the Bonds by the Issuer and was published not less than 7 days before the scheduled date of the public hearing referred to in the Notice; and

WHEREAS, on December 6, 2021, a public hearing (the “Hearing”) with regard to the issuance of the Bonds was held at 11:30 a.m. via teleconference in accordance with Revenue Procedure 2021-39 due to the COVID-19 pandemic. The Hearing was accessible to the residents of the approving governmental unit by calling a toll-free telephone number. The public was invited to join by dialing 1-646-876-9923 (Meeting ID: 843 4115 7822#). The Hearing was conducted by the undersigned as authorized hearing officer for the Issuer in a manner that provided a reasonable opportunity to be heard for persons with differing views on both the issuance of the Bonds and the location and nature of the Project; and

WHEREAS, the names and addresses of all parties attending the Hearing, together with a summary of matters discussed at the Hearing, are set forth on the Hearing Report attached hereto as Exhibit “B”; and

WHEREAS, the documents involved in the proposed issuance of the Bonds have been approved by the attorney for the Issuer, as evidenced by an opinion letter attached hereto as Exhibit “C”; and

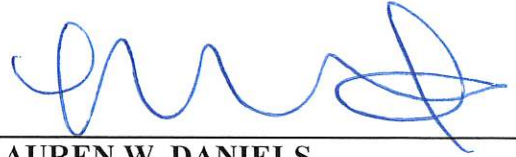
WHEREAS, a placement/investment letter relating to the contemplated placement or underwriting and sale of the Bonds, a copy of which is attached hereto as Exhibit “D”, has been furnished to the Issuer, as required by procedures adopted by the Board of Commissioners of Fulton County;

WHEREAS, a Minority and Female Business Enterprise Policy (“MFBE”) Utilization Report, a copy of which is attached hereto as Exhibit “E”, has been furnished to the Issuer, as required by procedures adopted by the Board of Commissioners of Fulton County;

WHEREAS, a copy of the Issuer's Minority and Female Business Enterprise Policy is attached hereto as Exhibit “F”, as required by procedures adopted by the Board of Commissioners of Fulton County;

NOW, THEREFORE, the undersigned does hereby certify the above facts are true and correct and does request the Board of Commissioners of Fulton County approve the issuance of the Development Authority of Fulton County Revenue Bonds (TUFF/Atlanta Housing, LLC – Georgia State University Project), Series 2022, for the purpose of complying with Section 147(f) of the Internal Revenue Code of 1986.

Given under my hand and seal of the Issuer, this 6<sup>th</sup> day of December, 2021.



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**LAUREN W. DANIELS**  
Hearing Officer, Development  
Authority of Fulton County

**EXHIBIT "A"**

**(PUBLISHER'S AFFIDAVIT)**



# TEFRA Notices

[🏠 \(https://www.developfultoncounty.com/\)](https://www.developfultoncounty.com/) >

[TEFRA Notices \(https://www.developfultoncounty.com/tefra-notices/\)](https://www.developfultoncounty.com/tefra-notices/)

## ➤ Available TEFRA Notices

Below are all available TEFRA notices. Click "Download TEFRA Notice" beside a date to retrieve the file.

**WellStar Health System, Inc. (Date Posted: December 27, 2019)**

[Download TEFRA Notice](#) 

**TUFF/Atlanta Housing, LLC (Date Posted: November 24, 2021)**

[Download TEFRA Notice](#) 

**TUFF CAUB LLC (Date Posted: January 25, 2021)**

[Download TEFRA Notice](#) 

**Trinity School, Inc. (Date Posted: October 11, 2021)**

[Download TEFRA Notice](#) 

**The Westminster Schools, Inc. (Date Posted: February 10, 2020)**

[Download TEFRA Notice](#) 

**Reserve at Hollywood LLC (Date Posted: May 26, 2021)**

[Download TEFRA Notice](#) 

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**Reserve at Hollywood LLC (Date Posted: February 22, 2021)**

[Download TEFRA Notice](#) 

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**Reserve at Hollywood LLC (Date Posted: February 10, 2020)**

[Download TEFRA Notice](#) 

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**Piedmont Healthcare, Inc. (Date Posted: August 14, 2019)**

[Download TEFRA Notice](#) 

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**Phoenix Ridge (South) (Date Posted: May 26, 2021)**

[Download TEFRA Notice](#) 

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**Phoenix Ridge (North) (Date Posted: May 26, 2021)**

[Download TEFRA Notice](#) 

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**Jonesboro Road Senior Village, LP (Date Posted: October 11, 2021)**

[Download TEFRA Notice](#) 

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**Holy Innocents' Episcopal School, Inc. (Date Posted: July 13, 2020)**

[Download TEFRA Notice](#) 

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**Heritage Station Senior LLC (Date Posted: October 11, 2021)**

[Download TEFRA Notice](#) 

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**Heritage Station Family LLC (Date Posted: October 11, 2021)**

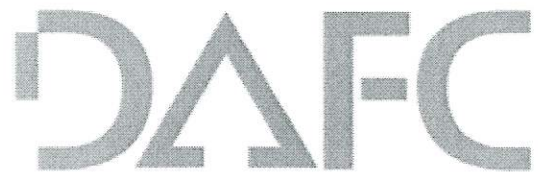
[Download TEFRA Notice](#) 

**Georgia Tech Facilities, Inc. (Date Posted: January 25, 2021)**

[Download TEFRA Notice](#) 

**AMC Campus Project I, LLC (Date Posted: April 12, 2021)**

[Download TEFRA Notice](#) 




DEVELOPMENT AUTHORITY  
of **FULTON COUNTY**

Development Authority of Fulton County

141 Pryor Street S.W.

Suite 2052

Atlanta, Georgia 30303

Phone:  **404.612.8078** (<tel:404.612.8078>)

Fax: 404.612.3895

 Search

Quick Links

▶ [TEFRA Notices](https://www.developfultoncounty.com/tefra-notices/) (<https://www.developfultoncounty.com/tefra-notices/>)

▶ [Monthly Meetings](#) ([media-center/](#))

▶ [Archived Minutes|Agendas \(/media-center/#prioryears\)](#)

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▶ [By-Laws / Policies \(https://www.developfultoncounty.com/by-laws-policies/\)](https://www.developfultoncounty.com/by-laws-policies/)

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▶ [FAQ \(https://www.developfultoncounty.com/faq-frequently-asked-questions/\)](https://www.developfultoncounty.com/faq-frequently-asked-questions/)

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▶ [News | Newsletter \(https://www.developfultoncounty.com/news-updates/\)](https://www.developfultoncounty.com/news-updates/)

NOTICE OF PUBLIC HEARING ON  
PROPOSED REVENUE BOND FINANCING BY THE  
DEVELOPMENT AUTHORITY OF FULTON COUNTY  
FOR THE BENEFIT OF TUFF/ATLANTA HOUSING, LLC

NOTICE IS HEREBY GIVEN that on the 6th day of December, 2021, at 11:30 a.m., the Development Authority of Fulton County (the "Issuer") will hold a public hearing via teleconference with respect to the issuance by the Issuer of not to exceed \$25,000,000 in aggregate principal amount of its revenue bonds (the "Bonds"), for the benefit of TUFF/Atlanta Housing, LLC, a Georgia limited liability company (the "Company"), whose sole member is The University Financing Foundation, Inc., a Georgia nonprofit corporation, the proceeds of which will be used by the Company to (i) refund all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project – Georgia State University Project), Series 2011, originally issued in the aggregate principal amount of \$33,115,000 (the "Refunded Bonds"), the proceeds of which were used to refund and defease all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project at Georgia State University Project), Series 2001A, which were used to finance the costs of the acquisition, construction and equipping of student housing facilities consisting of approximately 231 units, related parking facilities and appurtenant and related facilities for students of Georgia State University (the "University"), located at 135 Edgewood Avenue, Atlanta, Georgia, on the University campus (the "Project") and (ii) pay a portion of the costs of issuing the Bonds. The owner of the Project is the Company. The operator of the Project is the University. The Bonds will not constitute an indebtedness or obligation of the State of Georgia or of any county, municipal corporation or political subdivision thereof, but will be payable solely from revenues derived from the Company and pledged to the payment thereof. **NO PERFORMANCE AUDIT OR PERFORMANCE REVIEW WITHIN THE MEANING OF O.C.G.A. SECTION 36-82-100 SHALL BE CONDUCTED WITH RESPECT TO THE ISSUANCE OF THE BONDS.**

The public hearing will be held via teleconference in accordance with Revenue Procedure 2020-39 due to the COVID-19 pandemic and will be accessible to the residents of the approving governmental unit by calling a toll-free telephone number. The public is invited to join by dialing 1-646-876-9923 (Meeting ID: 843 4115 7822#). Any person interested in the Project being refinanced with the proceeds of the Bonds, the refunding of the Refunded Bonds or the issuance of the Bonds may appear and be heard.

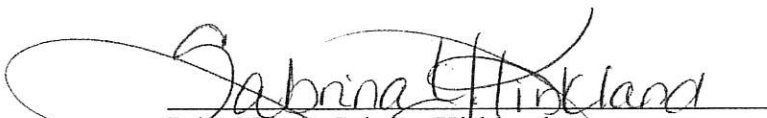
DEVELOPMENT AUTHORITY OF FULTON COUNTY

November 24, 2021


**AFFIDAVIT OF PUBLICATION**

Personally appeared before the undersigned officer authorized to administer oaths, Sabrina Kirkland, who upon being duly sworn deposes and says as follows:

I am the Executive Assistant/Technology Associate of the *Development Authority of Fulton County*, a public body corporate and politic, duly created by the Development Authorities Law, O.C.G.A. § 36-62-1, *et seq.* and activated by resolution, as amended, of the governing body of Fulton County. Pursuant to Section 147(f) of the Internal Revenue Code of 1986, as amended (26 C.F.R. § 1.147(f)-1 (2018)), public notice has been given by electronic posting on the public website of the *Development Authority of Fulton County*, the on-behalf-of issuer, as an alternative to the public website of the approving governmental unit. Attached hereto is a true and correct copy of the publication of the TEFRA Notice concerning TUFF/Atlanta HOUSING, LLC, which was published on the *Development Authority of Fulton County* website (<https://www.developfultoncounty.com/tefra-notices>) in an area of the website used to inform its residents about events affecting the residents on the following date: November 24, 2021

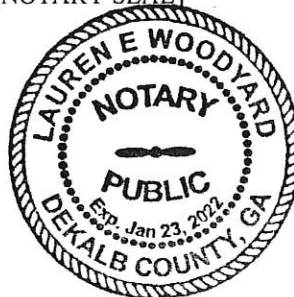
  
Print Name: Sabrina Kirkland

Sworn to and subscribed before me  
this 24<sup>th</sup> day of NOVEMBER, 2021.

  
Notary Public, State of Georgia

My commission expires: 01/23/22

[NOTARY SEAL]



**EXHIBIT "B"**

**(HEARING REPORT)**

1. The names and addresses of all parties present for the Hearing are as follows:

No parties were in attendance.

2. The matters discussed at the Hearing are summarized as follows:

Because no parties were present at the Hearing, no matters were discussed.

**EXHIBIT "C"**

**(LETTER OF AUTHORITY ATTORNEY)**



December 6, 2021

The Board of Commissioners  
of Fulton County  
Atlanta, Georgia

Development Authority of  
Fulton County  
Atlanta, Georgia

Dear Sir or Madam:

We are delivering this opinion in compliance with the requirements of the Chairman of the Fulton County Commission relative to approval of financing.

This opinion is to accompany the approval of the Issuer and Financing described as follows:

Issuer:	Development Authority of Fulton County
Financing:	Revenue Bond in the aggregate principal amount not to exceed \$25,000,000 (the "Bonds")
Borrower:	TUFF/Atlanta Housing, LLC
Project:	to (a) refund all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project – Georgia State University Project), Series 2011, originally issued in the aggregate principal amount of \$33,115,000, the proceeds of which were used to refund and defease all of the Issuer's Revenue Bonds (TUFF/Atlanta Housing, LLC Project at Georgia State University Project), Series 2001A, which were used to finance the costs of the acquisition, construction and equipping of student housing facilities consisting of approximately 231 units, related parking facilities and appurtenant and related facilities for students of Georgia State University (the "University"), located at 135 Edgewood Avenue, Atlanta, Georgia, on the University campus; and (b) pay all or a portion of the costs of issuing the Bonds.

December 6, 2021

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Public hearing was held before the Development Authority of Fulton County on December 6, 2021, pursuant to an advertisement appearing on the website of the Development Authority of Fulton County on November 24, 2021.

In rendering this opinion, with your permission, we have relied conclusively on representations of representatives of the Issuer, the Borrower, or both as to the correctness of the information set forth above.

Based on the foregoing, we are of the opinion that the Issuer is authorized under the laws of the State of Georgia to issue financing for projects of the type and nature described hereinabove pursuant to Article IX, Section VI, Paragraph III, of the Constitution of Georgia of 1983, as amended, the Development Authorities Law (O.C.G.A. 36-62-1 et seq.) and the Revenue Bond Law (O.C.G.A. 36-82-60 et seq.).

This opinion relates solely to the application relating to the Financing identified above as submitted by or on behalf of the Borrower to the Issuer, and is rendered solely to the parties to whom it is addressed. This opinion is not to be used for any other purpose, quoted in whole or in part, relied upon by or delivered to any other person or party.

Sincerely,



Sandra Z. Zayac

SZZ  
Enclosures

**EXHIBIT "D"**

**(Placement/Investment Letter)**

December 6, 2021

Development Authority of Fulton County  
c/o Sandy Zayac, Esq.  
Arnall Golden Gregory LLP  
171 17th Street NW, Suite 2100  
Atlanta, Georgia 30363

Dear Sir or Madam:

In connection with the public hearing, pursuant to Section 147(±) of the Internal Revenue Code of 1986, as amended, relating to the Development Authority of Fulton County (the "Issuer") and TUFF/Atlanta Housing, LLC (the "Borrower"), we are pleased to provide our preliminary view regarding the ability of the Issuer and the Borrower to raise up to \$25,000,000 of debt financing. Our view is based on our understanding of the transaction as it is presently structured, including our current knowledge of the operations, tax status, financial results, conditions and prospects of the Issuer and the Borrower and general economic, industry and market conditions. We note also that our view is based upon the limited information we have been provided by the Issuer and the Borrower to date regarding the transaction and, as we have not had the opportunity to conduct due diligence, we understand that we will be provided the opportunity to conduct thorough due diligence prior to any financing or commitment.

Based upon and subject to the terms of this letter, we are pleased to confirm that it is our preliminary view that, based upon current market conditions, up to \$25,000,000 of debt securities of the Issuer could be sold in the debt capital markets. Our views in this letter are based on our understanding of financing documents; (ii) satisfactory completion of an offering document for the financing; (iii) satisfactory completion of legal, accounting, financial and other due diligence customary in similar capital markets transactions; and (iv) the absence of any material adverse change in the condition, business, results, operations or prospects of the Issuer or the Borrower.

Furthermore, our view is subject to there not having occurred; (a) any general suspension of, or limitation on prices for, trading in securities in the New York Stock Exchange; (b) any suspension of trading in any securities of the Issuer or the Borrower; (c) any material adverse change in financial market conditions; (d) any declaration of a banking moratorium or any suspension of payments in respect of banks generally in New York or Georgia; or (e) any outbreak or escalation of hostilities or any other calamity or crisis that, in our judgment, is material and adverse.

This letter does not represent and should not be construed as a commitment by BofA Securities, Inc. or any of our respective affiliates to underwrite or arrange any financing for the Issuer or the Borrower and does not constitute an undertaking or contractual commitment to purchase on a principal or agency basis any debt securities of the Issuer or the Borrower. Any commitment to underwrite debt securities of the Issuer or the Borrower will be conditioned on the execution of a mutually acceptable definitive bond purchase agreement. Nothing expressed or implied in this

letter is intended to create legal relations between us or to constitute representations or warranties on which the Issuer or the Borrower may rely.

This letter has been delivered to you for your informational purposes only and is not to be distributed or disclosed to, or otherwise relied upon by, any other person without our consent, except as required by law.

If you have any questions with respect to this letter, do not hesitate to call the undersigned.

Very truly yours,

**BOFA SECURITIES, INC.,** as Underwriter



By: \_\_\_\_\_  
Director

**EXHIBIT "E"**

**(Minority and Female Business Enterprise Policy Utilization Report of Company)**

**BORROWER'S MFBE UTILIZATION REPORT**

This report must be submitted at the earlier of the date of TEFRA approval or final bond resolution, and thereafter, updated reports must be submitted on a quarterly basis, beginning with the first full quarter following the date of final bond resolution, to be received by the tenth day following the last day of the relevant quarter. The report should be mailed/mailed to: Development Authority of Fulton County, 141 Pryor Street, S.W., Suite 2052 (Peachtree Level), Atlanta, Georgia 30303 (sandra.zayac@agc.com). Upon the first submission of this report, please attach a copy of the Borrower's policy on hiring of minorities and females or the Prime Contractor's policy on the utilization of minority and female-owned businesses, as applicable. Please complete the report with "N/A - not applicable for refunding transactions" or mark "Not yet engaged" if contractors or subcontractors have not yet been retained.

**N/A - Not applicable to refunding transactions**

REPORTING PERIOD	PROJECT NAME:	University Lofts - Georgia State University Housing
FROM:	BOND CAPTION:	Dev Auth. of Fulton County Refunding Rev. Bonds (WTF/Atlanta Housing, GA)
TO:	PROJECT ADDRESS:	135 Edgewood Avenue, Atlanta, Georgia

PRIME CONTRACTOR (Identify if MFBE)	Contract Award Date	Contract Award Amount	Change Order Amount	Contract Period
Name:				University of Georgia, Sept 2022
Address:				
Telephone #:				

AMOUNT OF REQUISITION THIS PERIOD: \$ \_\_\_\_\_  
 TOTAL AMOUNT REQUISITION TO DATE: \$ \_\_\_\_\_

**SUBCONTRACTOR or VENDOR UTILIZATION (for equipping of Project or acquisition of personal property)**

Continue on additional page if necessary.

Name of Sub-Contractor or Vendor (Identify if MFBE)	Description of Work or Goods Purchased	Contract Amount	Amount Paid To Date	Amount Requisition This Period	Contract Period Starting Date	Contract Period Ending Date
TOTALS						

Borrower's Representative: Victor R Clements (Print Name)  
 Executed By: [Signature] (Signature)  
 Title: Vice President of Administration Date: 12.6.21  
 Address: 1900 Parkway Place, Suite 250, Marietta, GA 30067  
 Phone: 404.214.9445  
 Email: vic@huff.dig

## EXHIBIT "F"

### **(Copy of Authority's Minority and Female Business Enterprise Policy Revisions Adopted April 22, 2008)**

It is the policy of the Development Authority of Fulton County that discrimination against businesses by reason of the race, color, gender or national origin of the ownership of any such business is prohibited. The Company shall utilize contractors, subcontractors, suppliers and vendors that do not discriminate against employees or employment applicants because of race, color, gender or national origin, in connection with the development of the Project. The Company shall also make a good faith effort to utilize, to the extent feasible and reasonable under the circumstances, minority or female owned enterprises in connection with the development of the Project. In furtherance of this effort, the Company shall furnish to the Authority, at or before the earlier of the date of submission of TEFRA approval documentation, if applicable, or of the final bond resolution, a written report (i) projecting its utilization of minority and female owned business enterprises in connection with the construction and/or equipping of the proposed Project, (ii) identifying all significant contractors, subcontractors, suppliers, or vendors engaged or utilized to date in connection with the development of the Project, and (iii) specifically identifying all minority or female owned contractors, subcontractors, suppliers or vendors engaged or utilized to date. The report shall also identify a Company representative who will be responsible for future contact and information regarding minority and female owned business enterprise utilization in connection with Project construction and/or acquisition of personal property in conjunction with the Project. In addition to the aforementioned initial written report, the Company shall file updated reports with the Authority on a quarterly basis, beginning with the first full quarter following the date of final bond resolution and continuing through the date of completion of the Project. The Company shall also consent to on-site monitoring visits by the Authority to evaluate compliance with the Policy.