

NON-LITIGATION AND SIGNATURE IDENTIFICATION CERTIFICATE

STATE OF MICHIGAN  
COUNTY OF WAYNE

We hereby certify that we are the duly elected or appointed, qualified and acting officers of the Tax Increment Finance Authority of the City of Westland, in the County and State aforesaid (the "Authority"), as herein indicated, that we did officially sign the Authority's \$12,460,000 Tax Increment Refunding Bonds, Series 2021 (Limited Tax General Obligation) (Taxable) (the "Bonds"), dated as the date hereof, delivered herewith; that we are on the date hereof the officers having authority to execute and deliver the Bonds; that there is no litigation of any nature pending or threatened for the purpose of restraining or enjoining the issuance of the Bonds or the imposition and collection of taxes or tax increment revenues sufficient to pay the interest and principal thereof, nor directly affecting the proceedings or authority by which the Bonds are issued, the legality of the purpose for which the Bonds are issued, or the validity of the Bonds; that neither the corporate existence nor the boundaries of the Authority nor the title of its present officers to their respective offices is being contested; and that to the best of our knowledge there is no litigation pending or threatened indirectly or collaterally affecting any of the foregoing; and that none of the proceedings heretofore taken to authorize the issuance of the Bonds and to provide security therefor have been repealed, revoked or rescinded.

Dated: May 27, 2021

SIGNATURE

TITLE

William T. Jester

Chairperson

Andre Davis

Secretary

STATE OF MICHIGAN     )  
  ) ss.  
COUNTY OF WAYNE     )

On May \_\_, 2021, before me, a Notary Public in and for said County, appeared the Chairperson and the Secretary of the Tax Increment Finance Authority of the City of Westland, personally known to me to be the persons named herein and who executed this Certificate, and I acknowledge that they executed the same as their free act and deed and that the signature of the Chairperson and Secretary appearing hereon are true and genuine.

Donna Dewinter  
Notary Public, Wayne County, Michigan  
My Commission Expires: 03-03-2025

37620077.1/095959.00079

**DONNA DEWINTER**  
**NOTARY PUBLIC - STATE OF MICHIGAN**  
**COUNTY OF WAYNE**  
My Commission Expires March 03, 2025  
Acting in the County of Wayne

NON-LITIGATION AND SIGNATURE IDENTIFICATION CERTIFICATE

STATE OF MICHIGAN  
COUNTY OF WAYNE

We hereby certify that we are the duly elected or appointed, qualified and acting officers of the Tax Increment Finance Authority of the City of Westland, in the County and State aforesaid (the "Authority"), as herein indicated, that we did officially sign the Authority's \$12,460,000 Tax Increment Refunding Bonds, Series 2021 (Limited Tax General Obligation) (Taxable) (the "Bonds"), dated as the date hereof, delivered herewith; that we are on the date hereof the officers having authority to execute and deliver the Bonds; that there is no litigation of any nature pending or threatened for the purpose of restraining or enjoining the issuance of the Bonds or the imposition and collection of taxes or tax increment revenues sufficient to pay the interest and principal thereof, nor directly affecting the proceedings or authority by which the Bonds are issued, the legality of the purpose for which the Bonds are issued, or the validity of the Bonds; that neither the corporate existence nor the boundaries of the Authority nor the title of its present officers to their respective offices is being contested; and that to the best of our knowledge there is no litigation pending or threatened indirectly or collaterally affecting any of the foregoing; and that none of the proceedings heretofore taken to authorize the issuance of the Bonds and to provide security therefor have been repealed, revoked or rescinded.

Dated: May 27, 2021

SIGNATURE

TITLE

William T. Zembke  
[Signature]

Chairperson

Secretary

STATE OF MICHIGAN     )  
  ) ss.  
COUNTY OF WAYNE     )

On May \_\_, 2021, before me, a Notary Public in and for said County, appeared the Chairperson and the Secretary of the Tax Increment Finance Authority of the City of Westland, personally known to me to be the persons named herein and who executed this Certificate, and I acknowledge that they executed the same as their free act and deed and that the signature of the Chairperson and Secretary appearing hereon are true and genuine.

[Signature]  
Notary Public, Wayne County, Michigan  
My Commission Expires: 03-03-2025

37620077.1/095959.00079

**DONNA DEWINTER**  
**NOTARY PUBLIC - STATE OF MICHIGAN**  
**COUNTY OF WAYNE**  
My Commission Expires March 03, 2025  
Acting in the County of Wayne



NON-LITIGATION AND SIGNATURE IDENTIFICATION CERTIFICATE

STATE OF MICHIGAN  
COUNTY OF WAYNE

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Dated: May 27, 2021

SIGNATURE

TITLE

William T. Jank  
Rita Jones

Chairperson

Secretary

STATE OF MICHIGAN     )  
  ) ss.  
COUNTY OF WAYNE     )

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Donna Dewinter  
Notary Public, Wayne County, Michigan  
My Commission Expires: 03-03-2025

37620077.1/095959.00079

**DONNA DEWINTER**  
**NOTARY PUBLIC - STATE OF MICHIGAN**  
**COUNTY OF WAYNE**  
My Commission Expires March 03, 2025  
Acting in the County of Wayne

IN WITNESS WHEREOF, I have executed and delivered this certificate as of the date first above written.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziemba  
William Ziemba  
Its: Chairperson

37645084.1/095959.00079

IN WITNESS WHEREOF, I have executed and delivered this certificate as of the date first above written.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William Ziembra  
William Ziembra  
Its: Chairperson

37645084.1/095959.00079

IN WITNESS WHEREOF, I have executed and delivered this certificate as of the date first above written.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziemba  
William Ziemba  
Its: Chairperson

37645084.1/095959.00079

TAX CERTIFICATE

\$12,460,000

TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
(TAXABLE)  
(the "Bonds")

This Tax Certificate ("Certificate") is executed by a duly authorized representative of the Tax Increment Finance Authority of the City of Westland, County of Wayne, State of Michigan (the "Issuer") in connection with the issuance of the Bonds on the date hereof. The proceeds of the Bonds will be used to advance refund the Issuer's Tax Increment Bonds, Series 2013 (General Obligation - Limited Tax), dated September 30, 2013, maturing or subject to redemption on April 1 in the years 2028, 2031 and 2034, which were originally issued on a tax-exempt basis (the "Prior Bonds," as refunded, the "Refunded Bonds"). The Issuer hereby makes the following representations:

1. The proceeds of the Prior Bonds were used to finance the costs of (i) acquisition, construction, reconstruction, renovation, furnishing, and equipping of an existing 63,000 square foot building for use as a city administration building, (ii) acquisition, construction, furnishing, and equipping of an approximately 9,000 square foot fire station, (iii) acquisition and construction of a linear park and (iv) issuing the Prior Bonds. As of the date hereof, all of the proceeds of the Prior Bonds have been spent as described above.

2. As shown in the final numbers with respect to the Bonds, the principal amounts of the Bonds will amortize no more quickly than the escrow fund established to repay the Refunded Bonds. As such, no proceeds of the Bonds will become replacement proceeds of the Refunded Bonds prior to April 1, 2023 (i.e. the call date with respect to the Refunded Bonds).

3. The Issuer will comply with the private activity rules applicable to the Prior Bonds, pursuant to Section 141 of the Internal Revenue Code of 1986, as amended, and as described in the Non-Arbitrage and Tax Compliance Certificate with respect to the Prior Bonds, through April 1, 2023, the date upon which all of the Prior Bonds will either mature or be refunded with the proceeds of the Bonds.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziemba  
William Ziemba  
Its: Chairperson

Dated: May 27, 2021  
37625953.1/095959.00079



TAX CERTIFICATE

\$12,460,000

TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
(TAXABLE)  
(the "Bonds")

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1. The proceeds of the Prior Bonds were used to finance the costs of (i) acquisition, construction, reconstruction, renovation, furnishing, and equipping of an existing 63,000 square foot building for use as a city administration building, (ii) acquisition, construction, furnishing, and equipping of an approximately 9,000 square foot fire station, (iii) acquisition and construction of a linear park and (iv) issuing the Prior Bonds. As of the date hereof, all of the proceeds of the Prior Bonds have been spent as described above.

2. As shown in the final numbers with respect to the Bonds, the principal amounts of the Bonds will amortize no more quickly than the escrow fund established to repay the Refunded Bonds. As such, no proceeds of the Bonds will become replacement proceeds of the Refunded Bonds prior to April 1, 2023 (i.e. the call date with respect to the Refunded Bonds).

3. The Issuer will comply with the private activity rules applicable to the Prior Bonds, pursuant to Section 141 of the Internal Revenue Code of 1986, as amended, and as described in the Non-Arbitrage and Tax Compliance Certificate with respect to the Prior Bonds, through April 1, 2023, the date upon which all of the Prior Bonds will either mature or be refunded with the proceeds of the Bonds.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziemia  
William Ziemia  
Its: Chairperson

Dated: May 27, 2021  
37625953.1/095959.00079



TAX CERTIFICATE

\$12,460,000

TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
(TAXABLE)  
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1. The proceeds of the Prior Bonds were used to finance the costs of (i) acquisition, construction, reconstruction, renovation, furnishing, and equipping of an existing 63,000 square foot building for use as a city administration building, (ii) acquisition, construction, furnishing, and equipping of an approximately 9,000 square foot fire station, (iii) acquisition and construction of a linear park and (iv) issuing the Prior Bonds. As of the date hereof, all of the proceeds of the Prior Bonds have been spent as described above.

2. As shown in the final numbers with respect to the Bonds, the principal amounts of the Bonds will amortize no more quickly than the escrow fund established to repay the Refunded Bonds. As such, no proceeds of the Bonds will become replacement proceeds of the Refunded Bonds prior to April 1, 2023 (i.e. the call date with respect to the Refunded Bonds).

3. The Issuer will comply with the private activity rules applicable to the Prior Bonds, pursuant to Section 141 of the Internal Revenue Code of 1986, as amended, and as described in the Non-Arbitrage and Tax Compliance Certificate with respect to the Prior Bonds, through April 1, 2023, the date upon which all of the Prior Bonds will either mature or be refunded with the proceeds of the Bonds.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziembra  
William Ziembra  
Its: Chairperson

Dated: May 27, 2021  
37625953.1/095959.00079

\$12,460,000  
TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
(TAXABLE)  
(the "Bonds")

**CROSS RECEIPT**

The Chairperson of the Tax Increment Finance Authority of the City of Westland, County of Wayne, State of Michigan (the "Issuer"), hereby acknowledges receipt from Huntington Securities, Inc., d/b/a Huntington Capital Markets (the "Underwriter"), in accordance with the Bond Purchase Agreement, dated May 12, 2021, between the Issuer and the Underwriter (the "Bond Purchase Agreement"), the sum of \$12,379,010, which represents the par amount of the Bonds of \$12,460,000, less Underwriter's discount of \$80,990. This payment will provide for payment in full of the Bonds being sold to the Underwriter pursuant to the Bond Purchase Agreement.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziembra  
William Ziembra  
Its: Chairperson

The Underwriter referred to above, hereby acknowledges receipt from the Issuer of the Bonds, in book-entry-form, in proper denominations and number, being the securities purchased by the Underwriter pursuant to the Bond Purchase Agreement. The Underwriter hereby further acknowledges that it has received or hereby waives in due time, form and manner all proceedings, certificates, opinions, letters and other documents required by the Bond Purchase Agreement or otherwise to be furnished to it at or prior to the time of delivery and acceptance of the Bonds.

This Cross Receipt may be executed in counterparts.

Executed and delivered on this 27th day of May, 2021.

HUNTINGTON SECURITIES, INC.

By \_\_\_\_\_  
Louis C. Orcutt  
Its: Managing Director

\$12,460,000  
TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
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TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziembra  
William Ziembra  
Its: Chairperson

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HUNTINGTON SECURITIES, INC.

By \_\_\_\_\_  
Louis C. Orcutt  
Its: Managing Director



\$12,460,000  
TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND  
COUNTY OF WAYNE, STATE OF MICHIGAN  
TAX INCREMENT REFUNDING BONDS, SERIES 2021  
(LIMITED TAX GENERAL OBLIGATION)  
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TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

By William T. Ziembra  
William Ziembra  
Its: Chairperson

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Executed and delivered on this 27th day of May, 2021.

HUNTINGTON SECURITIES, INC.

By \_\_\_\_\_  
Louis C. Orcutt  
Its: Managing Director



Executed as of the date first written above.

TAX INCREMENT FINANCE AUTHORITY OF THE  
CITY OF WESTLAND  
County of Wayne  
State of Michigan

By William T. Ziemia  
William Ziemia  
Its: Chairperson

THE HUNTINGTON NATIONAL BANK  
as Escrow Agent

By: \_\_\_\_\_  
\_\_\_\_\_  
Its: \_\_\_\_\_

Executed as of the date first written above.

TAX INCREMENT FINANCE AUTHORITY OF THE  
CITY OF WESTLAND  
County of Wayne  
State of Michigan

By William T. Ziemba  
William Ziemba  
Its: Chairperson

THE HUNTINGTON NATIONAL BANK  
as Escrow Agent

By: \_\_\_\_\_  
\_\_\_\_\_  
Its: \_\_\_\_\_

Executed as of the date first written above.

TAX INCREMENT FINANCE AUTHORITY OF THE  
CITY OF WESTLAND  
County of Wayne  
State of Michigan

By William T. Ziemia  
William Ziemia  
Its: Chairperson

THE HUNTINGTON NATIONAL BANK  
as Escrow Agent

By: \_\_\_\_\_  
\_\_\_\_\_  
Its: \_\_\_\_\_

hereinafter defined under this caption only) to send certain information annually and to provide notice of certain events to certain information repositories pursuant to the requirements of Rule 15c2-12(b)(5) (the "Rule") adopted by the Securities and Exchange Commission under the Securities Exchange Act of 1934, as amended. "Beneficial Owner" means, under this caption only, any person who has the power, directly or indirectly, to vote or consent with respect to, or to dispose of ownership of, any Bonds (including any person holding Bonds through nominees, depositories or any other intermediaries). The information to be provided on an annual basis, the events which will be noticed on an occurrence basis and the other terms of the Undertaking, are set forth in APPENDIX F, "FORM OF CONTINUING DISCLOSURE UNDERTAKING" to this Official Statement.

A failure by the Authority or the City to comply with the Undertaking will not constitute an event of default under the Resolution and holders of the Bonds or Beneficial Owners are limited to the remedies described in the Undertaking. A failure by the Authority or the City to comply with the Undertaking must be reported by the respective Authority or the City, as applicable, in accordance with the Rule and must be considered by any broker, dealer or municipal securities dealer before recommending the purchase or sale of the Bonds in the secondary market. Consequently, such a failure may adversely affect the transferability and liquidity of the Bonds and their market price.

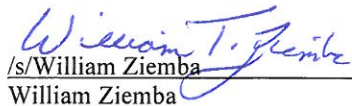
Except as described below, neither the Authority nor the City have failed to comply in any material respect with the requirements as described in subsection (b)(5) of the Rule of any continuing disclosure undertaking made by the Authority or the City, respectively, within the past 5 years. The City did not timely file notice of a credit rating change affecting the underlying Moody's rating of the City. A Material Event Notice describing the rating change and late filing has since been filed.

#### OTHER MATTERS

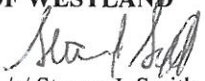
The Authority and the City certify that to their best knowledge and belief, this Official Statement, insofar as it pertains to the Authority and the City and its economic and financial condition, is true and correct as of its date, and does not contain, nor omit, any material facts or information which would make the statements contained herein misleading. All information contained in this Official Statement, other than that provided by the Authority and the City, is subject, in all respects, to the complete body of information contained in the original sources thereof and no guaranty, warranty or other representation is made concerning the accuracy or completeness of such information. In particular, no opinion or representation is rendered as to whether any projection will approximate actual results, and all opinions, estimates and assumptions, whether or not expressly identified as such, should not be considered statements of fact.

This Official Statement has been duly approved, executed and delivered by the Authority and the City on the date as set forth on the front cover of this Official Statement.

#### TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND

By:   
William Ziemba  
Its: Chairperson

#### CITY OF WESTLAND

By:   
Steven J. Smith  
Its: Chief Finance Officer



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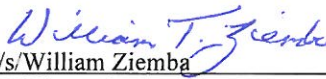
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#### OTHER MATTERS

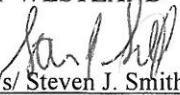
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#### TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND

By:   
William Ziemba  
Its: Chairperson

#### CITY OF WESTLAND

By:   
Steven J. Smith  
Its: Chief Finance Officer

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#### OTHER MATTERS


The Authority and the City certify that to their best knowledge and belief, this Official Statement, insofar as it pertains to the Authority and the City and its economic and financial condition, is true and correct as of its date, and does not contain, nor omit, any material facts or information which would make the statements contained herein misleading. All information contained in this Official Statement, other than that provided by the Authority and the City, is subject, in all respects, to the complete body of information contained in the original sources thereof and no guaranty, warranty or other representation is made concerning the accuracy or completeness of such information. In particular, no opinion or representation is rendered as to whether any projection will approximate actual results, and all opinions, estimates and assumptions, whether or not expressly identified as such, should not be considered statements of fact.

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#### TAX INCREMENT FINANCE AUTHORITY OF THE CITY OF WESTLAND

By:   
\_\_\_\_\_  
William Ziembra  
Its: Chairperson

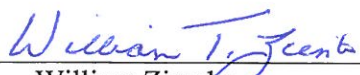
#### CITY OF WESTLAND

By:   
\_\_\_\_\_  
Steven J. Smith  
Its: Chief Finance Officer

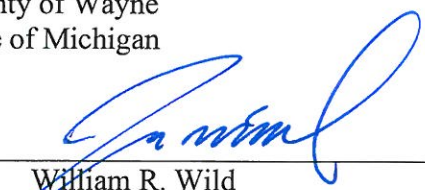
conducted thereby, (b) the undertaking, as amended, would have complied with the requirements of the Rule at the time of the primary offering of the Bonds, after taking into account any amendments or interpretations of the Rule, as well as any change in circumstances, and (c) the amendment does not materially impair the interests of Bondholders, as determined by parties unaffiliated with the Issuer or the City (such as independent legal counsel), but such interpretations may be changed in the future. If the accounting principles to be followed by the Issuer or the City in the preparing of the Audited Financial Statements are modified, the annual financial information for the year in which the change is made shall present a comparison between the financial statements as prepared on the prior basis and the statements as prepared on the new basis, and otherwise shall comply with the requirements of the Rule, in order to provide information to investors to enable them to evaluate the ability of the Issuer or the City to meet its obligations. A notice of the change in accounting principles shall be sent to the MSRB through EMMA.

TAX INCREMENT FINANCE AUTHORITY OF  
THE CITY OF WESTLAND

County of Wayne  
State of Michigan

By   
William Ziemba  
Its: Chairperson

CITY OF WESTLAND  
County of Wayne  
State of Michigan

By   
William R. Wild  
Its: Mayor

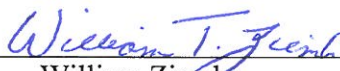
Dated: May 27, 2021  
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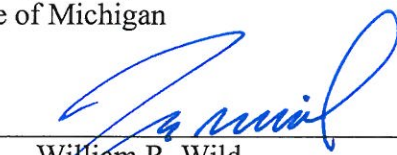
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