### FINAL OFFICIAL STATEMENT DATED JUNE 16, 2021

In the opinion of KP Law, P.C., Bond Counsel, based upon an analysis of existing law and assuming, among other matters, compliance with certain covenants, interest on the Bonds is excluded from gross income for federal income tax purposes under the Internal Revenue Code of 1986, as amended (the "Code"). Interest on the Bonds will not be included in computing the alternative minimum taxable income of individuals. Under existing law, interest on the Bonds is exempt from Massachusetts personal income taxes, and the Bonds are exempt from Massachusetts personal property taxes. Bond Counsel expresses no opinion regarding any other tax consequences related to the ownership or disposition of, or the accrual or receipt of interest on, the Bonds. The Bonds will **NOT** be designated as "qualified tax-exempt obligations" for purposes of Section 265(b)(3) of the Code. See "Tax Exemption" herein.

## \$11,700,000 TOWN OF SOUTH HADLEY Massachusetts

#### GENERAL OBLIGATION MUNICIPAL PURPOSE LOAN OF 2021 BONDS

#### **Dated: Date of Delivery**

#### Due: January 15, 2023 – 2050

#### Maturities on following page

Principal of the Municipal Purpose Loan of 2021 Bonds (the "Bonds") will be payable on January 15 of the years in which the Bonds mature. Interest from the date of the Bonds will be payable on January 15, 2022, and semi-annually thereafter on each July 15 and January 15 until the final maturity or redemption before final maturity of the Bonds. The Bonds will be subject to redemption prior to their stated dates of maturity as described herein.

The Bonds are valid general obligations of the Town of South Hadley, Massachusetts (the "Town") and the principal of and interest on the Bonds are payable from taxes which may be levied upon all property within the territorial limits of the Town and taxable by it subject to the limit imposed by Chapter 59, Section 21C of the Massachusetts General Laws with respect to that portion of the principal and interest payments (\$11,510,000 principal amount) that the Town has not voted to exempt from that limit, and, without limit as to rate or amount, with respect to that portion of the principal amount) that the Town has voted to exempt from the limit imposed by Chapter 59 Section 21C of the Massachusetts General Laws, except as provided under Chapter 44, Section 20 of the Massachusetts General Laws.

The Bonds are issuable only in fully registered form without coupons, and, when issued, will be registered in the name of Cede & Co., as Bondowner and nominee for The Depository Trust Company, New York, New York ("DTC"). DTC will act as securities depository for the Bonds. Purchases of the Bonds will be made in book-entry form, in the denomination of \$5,000 or any integral multiple thereof. (See "Book-Entry Transfer System" herein.)

The Bonds are offered subject to the final approving opinion of KP Law, P.C., Boston, Massachusetts, Bond Counsel to the Town, and to certain other conditions referred to herein. UniBank Fiscal Advisory Services, Inc., Whitinsville, Massachusetts, serves as Municipal Advisor to the Town. It is expected that the Bonds, in definitive form, will be delivered to DTC, or the offices of its custodial agent, on or after July 1, 2021, against payment in federal reserve funds.

This cover page contains certain information for quick reference only. It is not a summary of this issue. Investors must read the entire Official Statement to obtain information essential to making an informed investment decision.

# MATURITIES

	Principal	Interest	Price/	CUSIP		Principal	Interest	Price/	CUSIP
Year	Amount	Rate	Yield	<u>838124</u>	Year	Amount	<u>Rate</u>	Yield	<u>838124</u>
2023	\$490,000	5.000%	0.120%	TR6	2033	\$450,000	2.000%	1.620%	UB9
2024	475,000	5.000	0.180	TS4	2034	450,000	2.000	1.700	UC7
2025	575,000	5.000	0.300	TT2	2035	390,000	2.000	1.800	UD5
2026	575,000	5.000	0.440	TU9	2036	385,000	2.000	1.850	UE3
2027	570,000	5.000	0.550	TV7	2037	350,000	2.000	1.900	UF0
2028	570,000	5.000	0.700	TW5	2038	345,000	2.000	1.950	UG8
2029	560,000	5.000	0.820	TX3	2039	345,000	2.000	2.000	UH6
2030	535,000	4.000	0.950	TY1	2040	345,000	2.000	2.050	UJ2
2031	530,000	4.000	1.060	TZ8	2041	345,000	2.000	2.100	UK9
2032	490,000	2.000	1.550	UA1					

\$670,000 Term Bonds maturing on January 15, 2043 at 2.125% per annum, at 2.190% Yield UM5 \$670,000 Term Bonds maturing on January 15, 2045 at 2.250% per annum, at 2.250% Yield UP8 \$1,585,000 Term Bonds maturing on January 15, 2050 at 2.250% per annum, at 2.347% Yield UU7