Due: June 1, 2022-2051

FINAL OFFICIAL STATEMENT DATED MAY 12, 2021

In the opinion of Locke Lord LLP, 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. See "Tax Exemption" herein. <u>The Bonds will not be designated as "qualified tax-exempt obligations" for purposes of Section 265(b)(3) of the Code.</u>

\$40,525,000 PENTUCKET REGIONAL SCHOOL DISTRICT Massachusetts

GENERAL OBLIGATION STATE QUALIFIED SCHOOL BONDS UNLIMITED TAX

Dated: June 1, 2021

MATURITIES

	Principal	Interest	Price/	CUSIP		Principal	Interest	Price/	CUSIP
Year	Amount	Rate	Yield	<u>709699</u>	Year	<u>Amount</u>	Rate	Yield	<u>709699</u>
2022	\$780,000	5.000%	0.150%	KA9	2030	\$1,150,000	4.000%	1.100%	KJ0
2023	820,000	5.000	0.200	KB7	2031	1,200,000	4.000	1.150	KK7
2024	860,000	5.000	0.290	KC5	2032	1,245,000	2.000	1.500	KL5
2025	900,000	5.000	0.430	KD3	2033	1,270,000	2.000	1.600	KM3
2026	945,000	5.000	0.570	KE1	2034	1,295,000	2.000	1.700	KN1
2027	995,000	5.000	0.700	KF8	2035	1,320,000	2.000	1.800	KP6
2028	1,045,000	5.000	0.850	KG6	2036	1,350,000	2.000	1.900	KQ4
2029	1,095,000	5.000	1.000	KH4					

\$2,780,000 Term Bonds Maturing June 1, 2038 at 2.000% per annum, at 2.000% yield. KS0

	Principal	Interest	Price/	CUSIP		Principal	Interest	Price/	CUSIP
Year	Amount	Rate	Yield	709699	Year	<u>Amount</u>	Rate	Yield	<u>709699</u>
2039	\$1,430,000	2.000%	2.050%	KT8	2042	\$1,520,000	2.125%	2.200%	KW1
2040	1,460,000	2.000	2.100	KU5	2043	1,550,000	2.250	2.250	KX9
2041	1,490,000	2.125	2.150	KV3					

\$4,905,000 Term Bonds Maturing June 1, 2046 at 3.000% per annum, at 2.000% yield. LA8 \$9,120,000 Term Bonds Maturing June 1, 2051 at 2.500% per annum, at 2.500% yield. LF7

Principal of the Bonds will be payable June 1 of the years in which the Bonds mature. Interest from the date of the Bonds will be payable on December 1, 2021 and semi-annually thereafter on each June 1 and December 1 until the final maturity of the Bonds or redemption prior to maturity. The Bonds will be subject to redemption prior to their stated dates of maturity as described herein.

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 ("DTC"), New York, New York. DTC will act as securities depository for the Bonds. Principal and semiannual interest on the Bonds will be paid by the Treasurer and Receiver-General of The Commonwealth of Massachusetts, as Paying Agent. So long as DTC or its nominee, Cede & Co., is the Bondowner, such payments will be made directly to such Bondowner. Disbursement of such payments to the DTC Participants is the responsibility of DTC and disbursement of such payments to the Beneficial Owners is the responsibility of the DTC Participants and Indirect Participants, as more fully described herein. 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 legality of the Bonds will be approved by Locke Lord LLP, Boston, Massachusetts, Bond Counsel to the District (see "Opinion of Bond Counsel" herein). UniBank Fiscal Advisory Services, Inc., Whitinsville, Massachusetts, serves as Municipal Advisor to the

District. It is expected that the Bonds, in definitive form, will be delivered to DTC, or the offices of its custodial agent, on or about June 1, 2021 against payment in Federal Reserve fund.