

FINAL OFFICIAL STATEMENT DATED SEPTEMBER 15, 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. 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.

\$42,750,000
TOWN OF MIDDLEBOROUGH
Massachusetts

GENERAL OBLIGATION MUNICIPAL PURPOSE LOAN OF 2021 BONDS**Dated: October 1, 2021****Due: October 1, 2022 - 2049****MATURITIES**

<u>Year</u>	<u>Principal Amount</u>	<u>Interest Rate</u>	<u>Price/Yield</u>	<u>CUSIP 596051</u>	<u>Year</u>	<u>Principal Amount</u>	<u>Interest Rate</u>	<u>Price/Yield</u>	<u>CUSIP 596051</u>
2022	\$1,805,000	5.000%	0.110%	WW8	2030	\$1,455,000	5.000%	0.900%	XE7
2023	1,750,000	5.000	0.150	WX6	2031	1,455,000	4.000	1.030	XF4
2024	1,750,000	5.000	0.220	WY4	2032	1,455,000	3.000	1.320	XG2
2025	1,755,000	5.000	0.340	WZ1	2033	1,455,000	3.000	1.380	XH0
2026	1,755,000	5.000	0.460	XA5	2034	1,455,000	3.000	1.430	XJ9
2027	1,755,000	5.000	0.600	XB3	2035	1,455,000	3.000	1.480	XK3
2028	1,695,000	5.000	0.710	XC1	2036	1,450,000	2.000	1.800	XL1
2029	1,455,000	5.000	0.820	XD9					

\$2,900,000 Term Bonds maturing on October 1, 2038 at 2.000% per annum, at 2.000% Yield XN7

2039	1,450,000	2.000	2.210	XP2	2041	1,450,000	2.000	2.320	XR8
2040	1,450,000	2.000	2.270	XQ0					

\$5,800,000 Term Bonds maturing on October 1, 2045 at 2.250% per annum, at 2.350% Yield XV9

\$5,800,000 Term Bonds maturing on October 1, 2049 at 2.350% per annum, at 2.400% Yield XZ0

Principal of the Bonds will be payable October 1 of the years in which the Bonds mature. Interest from the date of the Bonds will be payable on April 1, 2022 and semi-annually thereafter on each October 1 and April 1 until maturity or redemption prior to maturity. The Bonds are subject to redemption prior to their stated dates of maturity as described herein.

The Bonds are issuable 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. 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, of Boston, Massachusetts, Bond Counsel to the Town. 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 about October 1, 2021 against payment in federal reserve funds.

