

**NOTICE OF INFORMATION
FOR THE
ASPIRE PUBLIC IMPROVEMENT DISTRICT**

TO: The Prospective Purchaser of Real Property in the Aspire Public Improvement District (the “District”)

This is a notification to you (this “Notice”), a prospective purchaser of real property in the District (the “Property”), prior to your entering into a contract with the seller to purchase the Property. The seller or an agent or broker of the seller of the Property is required to give you this Notice, which may be in addition to other notices or disclosures that may be required by federal, state or local law, and may request that you sign a copy of this Notice to indicate that you have received and read a copy of this Notice.

1. The Property is within the District, which is a public improvement district formed pursuant to the Public Improvement District Act, NMSA 1978, Sections 5-11-1 to -27 (2001, as amended through 2019) (the “Act”), City Ordinance Enactment No. 0-2003-12, Council Bill No. F/S 0-03-84, adopted on February 19, 2003 and as amended from time to time (the “PID Ordinance”), and City of Albuquerque City Council Bill No. F/S R-21-184, Enactment No. R-2021-061, adopted on September 8, 2021, and approving the formation of the District (the “Formation Resolution”).

2. The purpose of the District is to undertake certain Public Infrastructure Purposes (as that term is defined in the Act), including, but not limited to, financing certain Public Infrastructure Improvements (as that term is defined in the Act) through the sale of special levy bonds. Debt service on those special levy bonds is to be satisfied through a special levy imposed on the Property and all other property in the District in accordance with the Rate and Method of Special Levy Apportionment (defined in the Formation Resolution) as accepted and approved by the City of (the “City”) in the Formation Resolution (the “Special Levy”). The District may also finance all or a portion of the costs associated with the Public Infrastructure Improvements, as well as other Public Infrastructure Purposes, from the collection of the Special Levy, without the issuance of the District Bonds, through the satisfaction of subordinated promissory notes and other obligations of the District.

3. If you purchase the Property, you will be obligated to pay the Special Levy, once imposed, and, if applicable, any other property tax or special levy that may be imposed by the board of directors of the District (the “Board”).

4. The Special Levy, once imposed by the Board, and, if applicable, any other property tax or special levy that may be imposed by the Board are in addition to any other state, county or other local governmental taxes and assessments.

5. THE DISTRICT HAS NOT AUTHORIZED THE IMPOSITION OF A SPECIAL LEVY. HOWEVER, IF AUTHORIZED BY THE BOARD, THE MAXIMUM SPECIAL LEVY THAT MAY BE IMPOSED ON THE PROPERTY IS IDENTIFIED IN THE

DISTRICT'S RATE AND METHOD OF SPECIAL LEVY APPORTIONMENT, AS APPROVED BY THE CITY IN ITS FORMATION RESOLUTION, A COPY OF WHICH IS ATTACHED HERETO AS EXHIBIT 1 TO THIS NOTICE AND IS HEREBY INCORPORATED INTO AND MADE A PART OF THIS NOTICE.

6. THE DISTRICT IS NOT AUTHORIZED TO ISSUE GENERAL OBLIGATION BONDS AND NO GENERAL OBLIGATION BONDS HAVE BEEN ISSUED.

7. YOUR FAILURE TO PAY THE SPECIAL LEVY, ONCE IMPOSED BY THE BOARD, AND, IF APPLICABLE, ANY OTHER PROPERTY TAX OR SPECIAL LEVY THAT MAY BE IMPOSED BY THE BOARD COULD RESULT IN THE FORECLOSURE OF THE PROPERTY.

8. Additional information concerning the amount of the annual Special Levy assessment and the due dates of the Special Levy, once imposed, may be obtained from the City through the City's Public Improvement District Coordinator, whose office is located at the Department of Municipal Development, Seventh Floor, Room 7057, Albuquerque City Hall, One Civic Plaza NW, Albuquerque, New Mexico.

9. A feasibility study was completed as part of the formation of the District and the feasibility study is available from the City through the City's Public Improvement District Coordinator, whose office is located at the Department of Municipal Development, Seventh Floor, Room 7057, Albuquerque/Bernalillo County Government Center, One Civic Plaza NW, Albuquerque, New Mexico.

I (we) acknowledge that I (we) have read this Notice and received a copy of this Notice prior to entering into a contract to purchase the Property.

Executed this ___ day of _____, 202__ at Bernalillo County, New Mexico.

Signature: _____
Print Name _____

Signature: _____
Print Name _____
(additional signature, if required)

EXHIBIT 1 TO THE NOTICE

Rate and Method of Special Levy Apportionment

**RATE AND METHOD OF APPORTIONMENT OF SPECIAL LEVY
ASPIRE PUBLIC IMPROVEMENT DISTRICT**

An Annual Special Levy shall be levied, extended, and collected in the Aspire Public Improvement District (hereinafter referred to as the "PID" or the "District") each Fiscal Year, in an amount determined by the District Board or its designee through the application of the procedures described below. All of the real property in the PID, unless exempted by the provisions hereof, shall be subject to the Annual Special Levy for the purposes, to the extent, and in the manner herein provided.

A. DEFINITIONS

The terms used herein shall have the following meanings:

"100% Veteran Exemption" means the exemption set forth in Section 7-37-5.1, NMSA 1978.

"Act" means the Public Improvement District Act, being Sections 5-11-1 through 5-11-27, NMSA 1978.

"Administrative Expenses" means the actual or reasonably estimated costs permitted in accordance with the Act and directly related to the administration of the PID as determined by the District Board or its designee, including but not limited to, the costs of funding elections for new directors to the District Board; computing the Annual Special Levies and preparing the collection schedules (whether by the District Board or designee thereof or both); the costs of collecting the Annual Special Levies (whether by the County, or otherwise); the costs of remitting the Annual Special Levies to the Trustee for any Indebtedness; the costs of the Trustee (including its legal counsel) in the discharge of the duties required of it under any Indenture; the costs of the District or designee in complying with arbitrage rebate requirements, or responding to questions from the SEC or IRS pertaining to the Bonds or any audit from the SEC or IRS pertaining to the Bonds, if any; the costs of the District or designee in complying with the disclosure requirements of applicable federal and state securities laws and of the Act, including, but not limited to, public inquiries regarding the Annual Special Levies; and the costs associated with the release of funds from any escrow account. Administrative Expenses shall also include amounts advanced for any administrative purpose of the District including the costs of prepayment of the Annual Special Levies; recordings related to the prepayment, discharge or satisfaction of the Annual Special Levies; and the costs of commencing and pursuing to completion any foreclosure action arising from delinquent Annual Special Levies and the reasonable fees of legal counsel to the District incurred in connection with the foregoing.

"Administrator" means the designee of the District Board responsible for determining the Special Levy Requirement and coordinating the billing and collection of the Annual Special Levies.

"Annual Special Levy" means the special levy collected in each Fiscal Year from each Parcel pursuant to Section D to fund the Special Levy Requirement.

"Association Property" means any property in the District owned by or dedicated to a property owner association, including any master or sub-association, exclusive of any property on which Dwelling Units are or may be constructed.

"Bonds" means any bonds, including refunding bonds, or New Mexico Finance Authority Public Project Revolving Fund loans, whether in one or more series, secured by the Annual Special Levy.

"City" means the City of Albuquerque, New Mexico.

"County" means the County of Bernalillo, New Mexico.

"Infrastructure Development and Acquisition Agreement" means the development agreement entered into by and between the City, the District, and the Developer.

"Developed Platted Property" means all Platted Property for which (i) the Final Plat was recorded by the January 1 preceding the Fiscal Year for which the Annual Special Levy is being collected and (ii) a certificate of occupancy permit has been issued by the May 31 preceding the Fiscal Year for which the Annual Special Levy is being collected.

"Developer" means Heritage Trails Development I, LLC.

"District Board" means the governing body of the District.

"Dwelling Unit" or "DU" means a residential dwelling unit.

"Exempt Property" means all property exempt from the Annual Special Levy pursuant to Section G.

"Final Plat" means a final plat or final subdivision of land that is approved by the City and recorded with the County.

"Fiscal Year" means the twelve-month period starting July 1 and ending June 30.

"Indebtedness" means any Bonds, notes, and/or other obligations of the District secured by the Annual Special Levy, including reimbursement obligations, and authorized pursuant to (i) Sections 10 and 20 of the Act and/or (ii) the Development Agreement.

"Indenture" means the indenture, fiscal agent agreement, trust agreement, resolution or other instrument pursuant to which Indebtedness is issued, as modified, amended and/or supplemented from time to time, and any instrument replacing or supplementing the same.

"Levyable Property" means all property within the District which is not Exempt Property or which has not prepaid the Maximum Annual Special Levy in full pursuant to Section H.

"Maximum Annual Special Levy" means the maximum special levy, determined in accordance with Section B and Section C that can be levied by the District Board in any Fiscal Year on any Parcel of Levyable Property.

"Parcel" means a lot or parcel within the boundaries of the District that is assigned a uniform property code as shown on a cadastral map.

"Parcel Map" means an official map of the County designating parcels by uniform property code.

"Phase 1" means Unit 1 of the Aspire Subdivision.

"Phase 2" means Unit 2 of the Aspire Subdivision.

"Phase 3" means Unit 3 of the Aspire Subdivision.

"Phase 4" means Unit 4 of the Aspire Subdivision.

"Platted Property" means all Residential Lots for which a Final Plat was recorded by the January 1 preceding the Fiscal Year for which the Annual Special Levy is being collected.

"Preliminary Plat" means a preliminary plat of subdivision which has been approved by the City.

"Public Property" means all property in the District owned by or dedicated to the federal government, the State of New Mexico, the County, the City, or any local government or other public agency.

"Residential Lot" means a Parcel of Levyable Property for which a building permit (i) may and is

anticipated to be issued without any further subdivision of the Parcel or (ii) has been issued for a Dwelling Unit.

"Special Levy Requirement" means that amount determined by the District Board or its designee as required in any Fiscal Year for the District to pay and/or reimburse amounts advanced to pay its: (1) Administrative Expenses, (2) debt service and/or payments on any Indebtedness, (3) an amount equal to the anticipated delinquent Annual Special Levies and any anticipated shortfall in Annual Special Levies resulting from the 100% Veteran Exemption, all as determined by the District Board or the Administrator, (4) any amount required to replenish any reserve fund established in connection with such Indebtedness, (5) the costs of credit enhancement and fees for instruments that serve as the basis of a reserve fund in lieu of cash related to any such Indebtedness, (6) for acquisition and/or construction of authorized public infrastructure improvements, and (7) for costs incurred in connection with the formation of the District.

"Total Maximum Annual Special Levies" means for any Fiscal Year the sum of the Maximum Annual Special Levy for such Fiscal Year for each Parcel within the District. The Total Maximum Annual Special Levies for the District may be adjusted as a result of prepayments, revisions to Appendix A, and/or revisions pursuant to Section C herein.

"Trustee" means the trustee or fiscal agent under any Indenture.

"Undeveloped Platted Property" means Platted Property not classified as Developed Platted Property.

"Undeveloped Property" means all Levyable Property that is not classified as Developed Platted Property or Undeveloped Platted Property.

B. CLASSIFICATION OF PROPERTY

On or about June 1 of each Fiscal Year, all property within the District shall be classified as Exempt Property or Levyable Property. All Levyable Property shall be classified in accordance with Appendix A and assigned to one of the levy classifications shown in Table 1 based on typical lot width. Parcels shall be further classified as Developed Platted Property, Undeveloped Platted Property, or Undeveloped Property.

C. MAXIMUM ANNUAL SPECIAL LEVY

The Maximum Annual Special Levy for a Parcel of Levyable Property shall be determined pursuant to Section C.1 below, adjusted pursuant to Section C.2 as applicable.

C.1 MAXIMUM ANNUAL SPECIAL LEVY

Subject to Section C.2 below, the Maximum Annual Special Levy applicable to each Parcel of Levyable Property shall be determined by reference to Appendix A and Table 1. Prior to the recordation of the Final Plat, the Maximum Annual Special Levy for a Parcel of Levyable Property shall be determined by multiplying the expected number and classification of Dwelling Units for such Parcel, as determined from Appendix A, by the corresponding Maximum Annual Special Levy amounts set forth in Table 1 on the following page.

TABLE 1 MAXIMUM ANNUAL SPECIAL LEVY		
LEVY CLASSIFICATION	ANTICIPATED RESIDENTIAL DWELLING UNITS	MAXIMUM ANNUAL SPECIAL LEVY
Typical Lot Width <= 45'	506	\$1,241/Residential Lot
Typical Lot Width > 45'	0	\$1,241/Residential Lot

C.2 REVISION TO MAXIMUM ANNUAL SPECIAL LEVY OR PREPAYMENT REQUIRED DUE TO THE REDUCTION IN TOTAL MAXIMUM ANNUAL SPECIAL LEVIES

If at any time after Bonds have been issued the District Board or the Administrator determines that there has been or will be a reduction in the Total Maximum Annual Special Levies for the District as a result of an amendment to Appendix A, or other event, which reduces the Total Maximum Annual Special Levies such that the annual debt service coverage ratio on any issued and outstanding Bonds is less than that specified in the Indenture, then at the discretion of the District Board, only in compliance with the Act, either (i) if permitted by law, the Maximum Annual Special Levy for the Parcel(s) for which such a reduction has or will occur shall be revised pursuant to C.2.a below to compensate for the reduction or (ii) a prepayment shall be made pursuant to C.2.b below. Each year's annual debt service coverage ratio, if applicable, shall be determined in accordance with the Indenture.

C.2.a ADJUSTED MAXIMUM ANNUAL SPECIAL LEVY

If the District Board determines that the Maximum Annual Special Levy for the District shall be increased to compensate for the reduction, the then applicable Maximum Annual Special Levy for the subject Parcel(s) shall be increased by multiplying such Maximum Annual Special Levy by a quotient calculated as follows:

First: Calculate the applicable Maximum Annual Special Levies for the subject Parcel(s), taking into consideration the changes resulting in the reduction;

Second: Calculate the required Maximum Annual Special Levies by adding together the estimated Administrative Expenses and the required debt service coverage ratio multiplied by the annual payments on the outstanding Bonds;

Third: Subtract the current Total Maximum Annual Special Levies for the District from the required Maximum Annual Special Levies calculated in the second step;

Fourth: The numerator for the quotient is equal to the sum of the amounts from the first and third steps; and

Fifth: The denominator for the quotient is equal to the amount from the first step.

The District Board shall take such steps as appropriate to record notice of any such change.

C.2.b PREPAYMENT REDUCTION

If the District Board determines that the reduction in the Maximum Annual Special Levies shall be prepaid, such prepayment amount shall be computed pursuant to Section H, with

the following modifications:

- The amount calculated pursuant to the third step above shall be substituted for the term Maximum Annual Special Levy when computing the prepayment.

C.3 APPENDIX A AMENDMENTS

Appendix A may be amended pursuant to an executed certificate, the form of which is attached as Appendix B. Any amendment to Appendix A approved by the District Board shall be recorded with the County Clerk.

D. APPORTIONMENT OF ANNUAL SPECIAL LEVY

Commencing with Fiscal Year 2021-2022 and for each following Fiscal Year, the District Board shall apportion the Annual Special Levy to each Parcel of Levyable Property in accordance with the procedure set forth below, provided the Annual Special Levy for any Residential Lot does not exceed its Maximum Annual Special Levy.

D.1 PRIOR TO THE ISSUANCE OF BONDS

Prior to the issuance of Bonds, the Annual Special Levy shall be collected from each Parcel of Developed Platted Property in equal percentages up to 100% of the applicable Maximum Annual Special Levy until the Annual Special Levies equal the Special Levy Requirement. Prior to the issuance of Bonds, there will be no Annual Special Levy collected from (i) Undeveloped Platted Property or (ii) Undeveloped Property.

D.2 AFTER THE ISSUANCE OF BONDS

After the issuance of Bonds, the Annual Special Levy shall be collected from each Parcel of Levyable Property, not to exceed its Maximum Annual Special Levy, sufficient to fund the Special Levy Requirement in accordance with the following steps:

First: The Annual Special Levy shall be collected from each Parcel of Developed Platted Property in equal percentages up to 100% of its applicable Maximum Annual Special Levy;

Second: If additional monies are needed to fund the Special Levy Requirement after the first step, the Annual Special Levy shall be collected from each Parcel of Undeveloped Platted Property in equal percentages up to 100% of its applicable Maximum Annual Special Levy; and

Third: If additional monies are needed to fund the Special Levy Requirement after the second step, the Annual Special Levy shall be collected from each Parcel of Undeveloped Property in equal percentages up to 100% of its applicable Maximum Annual Special Levy.

Equal percentages means the Annual Special Levy for each Parcel of Developed Platted Property, computed as a percentage of its applicable Maximum Annual Special Levy, is the same as for all other Parcels of Developed Platted Property; the Annual Special Levy for each Parcel of Undeveloped Platted Property, computed as a percentage of its applicable Maximum Annual Special Levy, is the same as for all other Parcels of Undeveloped Platted Property; and the Annual Special Levy for each Parcel of Undeveloped Property, computed as a percentage of its applicable Maximum Annual Special Levy, is the same as for all other Parcels of Undeveloped Property.

E. MANNER OF COLLECTION

The Annual Special Levy shall constitute a lien on the property subject thereto which shall have priority

co-equal to the lien of general *ad valorem* property taxes. The Annual Special Levy will be billed by the County in the same manner and at the same time as general *ad valorem* property taxes and will appear as a separate item on the property tax bill for real property within the District as that property is identified on the tax roll on January 1 of each year in which the Annual Special Levy is in effect. As provided in the Act, the District has established foreclosure remedies which shall apply following nonpayment of the Annual Special Levy, which are referred to in the Notice of Imposition of Special Levy. Under those procedures, the Annual Special Levy is subject to foreclosure by the District beginning six months after written notice of delinquency is provided to the owner of the real property to which the delinquency applies. The lien of the Annual Special Levy includes delinquencies, penalties and interest thereon at a rate not to exceed the maximum legal rate of interest per year and penalties otherwise applicable.

F. TERM

The special levy will remain in place until all Indebtedness of the District is fully repaid.

G. EXEMPTIONS

Property exempt from the Annual Special Levy consists of (i) Association Property and (ii) Public Property. The Annual Special Levy shall be imposed on all property identified by the County as being subject to the 100% Veteran Exemption but, assuming the 100% Veteran Exemption has been lawfully enacted by the New Mexico Legislature and the applicable disabled veteran property owner or the surviving spouse of the disabled veteran property owner is actually entitled to receive such exemption, the District shall not seek to collect the Annual Special Levy from such property in such Fiscal Year.

H. PREPAYMENT

The Maximum Annual Special Levy for the current and all remaining Fiscal Years through the final term of the Special Levy for any Parcel may be prepaid in full and the obligation of the Parcel to pay that portion of the Maximum Annual Special Levy that has been prepaid permanently satisfied as described herein, provided that a prepayment may be made only if there are no outstanding delinquent Annual Special Levies with respect to such Parcel and all other Parcels under the same ownership at the time of prepayment. An owner of a Parcel intending to prepay the Maximum Annual Special Levy shall provide the District Board with written notice of intent to prepay in full the Maximum Annual Special Levy. Within 30 days of receipt of such written notice, the District Board or its designee shall notify such owner of the prepayment amount necessary to permanently satisfy the obligation to pay the Special Levy for such Parcel (the "Prepayment") and the date through which such prepayment shall be valid.

A Prepayment means an amount equal to (a) the sum of (1) Prepaid Principal, (2) Prepaid Administrative Expenses, (3) Premium, (4) Defeasance, and (5) Fees minus (b) the sum of (1) the Reserve Fund Credit and (2) the Capitalized Interest Credit, if provided for in the Indenture, where the terms "Principal," "Prepaid Administrative Expenses", "Premium," "Defeasance," "Fees," "Reserve Fund Credit," and "Capitalized Interest Credit" have the following meanings:

A Prepayment shall be calculated in accordance with the following terms:

"Prepaid Principal" equals the present value of the current and remaining Maximum Annual Special Levy upon the Parcel for which the prepayment is to be made excluding the estimated portion of such Maximum Annual Special Levy allocated to pay current and estimated future Administrative Expenses, as determined by the District Board or its designee. The present value shall be computed using as the discount rate the current yield on the outstanding Bonds, if any, or the current yield on any other outstanding Indebtedness if there are no outstanding Bonds. If the Maximum Annual

Special Levy for the Parcel is pledged toward the repayment of more than one series or tranches of Bonds, then the aggregate yield for such Bonds shall be employed; if there are no outstanding Bonds, the aggregate yield on any other outstanding Indebtedness shall be employed. The yield on such Bonds or other Indebtedness, as applicable, shall be the discount rate which, when used to determine the present value of the remaining payments on said Bonds or Indebtedness, results in an amount equal to the outstanding principal amount of such Bonds or Indebtedness.

"Prepaid Administrative Expenses" equals present value of the estimated portion of the applicable Parcel's current and future Maximum Annual Special Levies allocated to pay for current and future Administrative Expenses, as determined by the District Board or its designee. The present value shall be computed using as the discount rate the anticipated annual return on the Prepaid Administrative Expenses, as determined by the District Board or its designee.

"Premium" means an amount equal to the Prepaid Special Levy multiplied by the applicable redemption premium, if any, for any Bonds so redeemed with the proceeds of any such prepayment.

"Defeasance" means the amount needed to pay interest on any Bonds to be redeemed until the earliest redemption date for the outstanding Bonds less any Annual Special Levies heretofore paid for such Parcel and available to pay interest on the redemption date for the Bonds.

"Fees" equal the expenses of the PID associated with the Prepayment as calculated by the District Board or its designee and include, but are not limited to, the costs of computing the Prepayment, the costs of amending any Annual Special Levy previously enrolled with the County, the costs of redeeming the Bonds, and the costs of recording and publishing any notices to evidence the prepayment of the Maximum Annual Special Levy and the redemption of Bonds.

"Reserve Fund Credit" shall equal the lesser of (i) the Reserve Fund Requirement (as such term is defined in the Indenture) multiplied by a fraction the numerator of which is equal to the Prepaid Special Levy and denominator of which is equal to the outstanding Bonds or (ii) an amount determined by subtracting the Reserve Requirement in effect after the redemption and/or retirement of the Bonds from the balance in the Reserve Fund (as such term is defined in the Indenture) on the prepayment calculation date, provided that the amount determined is not less than zero.

"Capitalized Interest Credit" shall equal the reduction in interest payable on the Bonds from the redemption date for the Bonds to be redeemed and/or retired from proceeds of the Prepaid Special Levy to the end of the capitalized interest period, as determined by the District Board or its designee. No capitalized interest credit is given if the redemption and/or retirement date for the Bonds redeemed and/or retired from the Prepayment is after the capitalized interest period.

The sum of the amounts calculated in the preceding steps shall be paid to the District and shall be used as applicable to (a) pay principal and premium first on any Bonds and second on any other Indebtedness in accordance with the applicable Indentures, (b) pay interest first on any Bonds and second on any other Indebtedness to the date of redemption and/or retirement in accordance with the applicable Indentures, (c) pay Fees associated with the Prepayment, (d) pay future Administrative Expenses, and (e) pay or reimburse the cost of public improvements. Upon the receipt of the Prepayment by the District and the deposit of such funds with the Trustee, the obligation to pay the Maximum Annual Special Levy for such Parcel shall be deemed to be permanently satisfied, the Maximum Annual Special Levy shall not be levied

thereafter on such Parcel, and the Administrator shall cause a notice of cancellation of the Maximum Annual Special Levy for such Parcel to be recorded.

Notwithstanding the foregoing, no Prepayment shall be allowed unless the amount of Maximum Annual Special Levies that may be collected after the proposed prepayment is at least the sum of (i) the estimated annual Administrative Expenses associated with and/or allocable to the Special Levy Requirement taking into consideration the Prepaid Administrative Expenses and (ii) the required annual debt service coverage ratio set forth in the Indenture on any issued and outstanding Bonds multiplied by the annual payments on such Bonds, taking into account the amount of Bonds to remain outstanding after such prepayment.

I. AMENDMENTS

This Rate and Method of Apportionment of Special Levy may be amended pursuant to and to the extent permitted by the Act. The District Board may make clarifications with respect to this Rate and Method of Apportionment of Special Levy without further notice under the Act and without notice to owners of property within the District in order to (i) clarify or correct minor inconsistencies in the matters set forth herein, and/or (ii) provide for lawful procedures for the collection and enforcement of the Annual Special Levy so as to ensure the efficient collection of the Annual Special Levy for the benefit of the owners of the Indebtedness and the District, respectively.

No amendment shall be approved by the District Board if it violates any other agreement binding upon the District and unless and until it has (i) found and determined that the amendment is necessary and appropriate and does not materially adversely affect the rights of the owners of the Indebtedness or the District Board has obtained the consent of one hundred percent (100.00%) of the owners of the Indebtedness and (ii) received an opinion from bond counsel to the effect that the amendment does not violate the Act, and is authorized pursuant to the terms of the Indenture and this Rate and Method of Apportionment of Special Levy.