Supplement
dated October 7, 2026

to the

Official Statement
dated October 1, 2026

relating to

GREENPORT UNION FREE SCHOOL DISTRICT,
SUFFOLK COUNTY, NEW YORK

$5,000,000* TAX ANTICIPATION NOTES FOR 2026-2027 TAXES
(the "Notes")

Date of Issue: October 22, 2026 **Maturity Date: June 24, 2027**

The Preliminary Official Statement, dated October 1, 2026 (the "Preliminary Official Statement"), relating to the Notes of the Greenport Union Free School District of Islip (the "District") is hereby supplemented by this Supplement, dated October 7, 2026 (the "Supplement"), to update the section entitled: "The State Comptroller's Fiscal Stress Monitoring System and OSC Compliance Reviews".

Other than with respect to the information provided herein, this Supplement is not otherwise updating the Preliminary Official Statement, which speaks as of its date.

The "The State Comptroller's Fiscal Stress Monitoring System and OSC Compliance Reviews" section on page 19 has been superseded and replaced with the following:

The State Comptroller's Fiscal Stress Monitoring System and OSC Compliance Reviews

The New York State Comptroller has reported that New York State's school districts and municipalities are facing significant fiscal challenges. As a result, the Office of the State Comptroller has developed a Fiscal Stress Monitoring System ("FSMS") to provide independent, objectively measured and quantifiable information to school districts and municipal officials, taxpayers and policy makers regarding the various levels of fiscal stress under which the State's school districts and municipalities are operating.

The fiscal stress scores are based on financial information submitted as part of each school ST-3 report filed with the State Education Department annually, and each municipality's annual report filed with the Office of the State Comptroller (OSC). Using financial indicators that include year-end fund balance, cash position and patterns of operating deficits, the system creates an overall fiscal stress score which classifies whether a school district or municipality is in "significant fiscal stress", in "moderate fiscal stress," as "susceptible to fiscal stress" or "no designation". Entities that do not accumulate the number of points that would place them in a stress category will receive a financial score but will be classified in a category of "no designation." The system also produces environmental stress scores based primarily on federal Census data. The system's environmental stress indicators are designed to assess factors that may increase a particular local government's exposure to fiscal stress, including: change in population, poverty rate, percentage of nonworking age population, tax base, median income, unemployment rate, and reliance on State and federal aid

The classification should not be interpreted to imply that the entity is completely free of fiscal stress conditions. Rather, the entity's financial information, when objectively scored according to the FSMS criteria, did not generate sufficient points to place them in one of the three established stress categories.

The most current applicable report of OSC designates the District as follows:

Fiscal Score: 35.0% - "Susceptible to Fiscal Stress"
Environmental Score: 31.7% - "Susceptible to Fiscal Stress"

More information on the FSMS may be obtained from the Office of the State Comptroller.

In addition, OSC helps local government officials manage government resources efficiently and effectively. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through its audits, which identify opportunities for improving operations and governance. The most recently completed audit was published June 8, 2022. The purpose of the audit was to determine whether the District used its resources to provide mental health components of the New York Safe Schools Against Violence in Education Act (SAVE Act) training requirement to staff. The complete report may be found on the OSC's official website.

References to websites and/or website addresses presented herein are for informational purposes only. Unless specified otherwise, such websites and the information or links contained therein are not incorporated into, and are not part of, this Statement.

This Preliminary Official Statement and the information contained herein are subject to completion or amendment. Under no circumstance shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the securities laws of any such jurisdiction.

PRELIMINARY OFFICIAL STATEMENT DATED OCTOBER 1, 2026

NEW ISSUE **TAX ANTICIPATION NOTES**

In the opinion of Hawkins Delafield & Wood LLP, Bond Counsel to the District, under existing statutes and court decisions and assuming continuing compliance with certain tax certifications described herein, (i) interest on the Notes is excluded from gross income for federal income tax purposes pursuant to Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and (ii) interest on the Notes is not treated as a preference item in calculating the alternative minimum tax under the Code, however, interest on the Notes is included in the "adjusted financial statement income" of certain corporations that are subject to the alternative minimum tax under Section 55 of the Code. In addition, in the opinion of Bond Counsel to the District, under existing statutes, interest on the Notes is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York. (See "Tax Matters" herein).

*The District will **NOT** designate the Notes as "qualified tax-exempt obligations" pursuant to the provisions of Section 265(b)(3)(B) of the Code.*

GREENPORT UNION FREE SCHOOL DISTRICT, SUFFOLK COUNTY, NEW YORK

$5,000,000* TAX ANTICIPATION NOTES FOR 2026-2027 TAXES (the "Notes")

Date of Issue: October 22, 2026 **Maturity Date: June 24, 2027**

The Notes are general obligations of the Greenport Union Free School District, in Suffolk County, New York (the "District"), and will contain a pledge of the faith and credit of the District for the payment of the principal of and interest on the Notes and, unless paid from other sources, the Notes are payable from ad valorem taxes which may be levied upon all the taxable real property within the District, subject to certain statutory limitations. See "*The Tax Levy Limit Law*" herein.

The Notes will not be subject to redemption prior to maturity.

The Notes will be issued in registered form and, at the option of the purchaser(s), the Notes will be (i) registered in the name of the successful bidder(s) or (ii) registered to Cede & Co., as the partnership nominee for The Depository Trust Company, New York, New York ("DTC") as book-entry notes.

If the Notes are registered in the name of the successful bidder(s), a single note certificate will be issued for those Notes bearing the same rate of interest in the aggregate principal amount awarded to such purchaser(s) at such interest rate. Principal of and interest on such Notes will be payable in Federal Funds by the District, at such bank or trust company located and authorized to do business in the State of New York as selected by the successful bidders.

If the Notes are issued in book-entry form, such notes will be delivered to DTC, which will act as securities depository for the Notes. Beneficial owners will not receive certificates representing their interest in the Notes. Individual purchases may be made in denominations of $5,000 or integral multiples thereof. A single note certificate will be issued for those Notes bearing the same rate of interest and CUSIP number in the aggregate principal amount awarded to such purchaser(s) at such interest rate. Principal of and interest on said Notes will be paid in Federal Funds by the District to Cede & Co., as nominee for DTC, which will in turn remit such principal and interest to its participants for subsequent distribution to the beneficial owners of the Notes as described herein. Transfer of principal and interest payments to beneficial owners by participants of DTC will be the responsibility of such participants and other nominees of beneficial owners. The District will not be responsible or liable for payments by DTC to its participants or by DTC participants to beneficial owners or for maintaining, supervising or reviewing the records maintained by DTC, its participants or persons acting through such participants. (See *"Description of Book-Entry System"* herein).

THE DISTRICT HAS EXPERIENCED A SIGNIFICANT DETERIORATION IN ITS FINANCIAL POSITION IN RECENT YEARS AS A RESULT OF STRUCTURAL OPERATING IMBALANCES THAT HAVE CAUSED A SUBSTANTIAL DRAWDOWN OF THE DISTRICT'S FUND BALANCE AND RESERVES. THE DISTRICT EXPECTS ANOTHER OPERATING DEFICIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026, RESULTING IN A PROJECTED CUMULATIVE UNASSIGNED GENERAL FUND DEFICIT OF APPROXIMATELY $545,000. THE ACTUAL AMOUNT OF SUCH CUMULATIVE DEFICIT IS NOT EXPECTED TO BE KNOWN UNTIL THE AUDIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026 HAS BEEN COMPLETED, WHICH IS EXPECTED TO BE ON OR ABOUT OCTOBER 20, 2026.

THE FOREGOING COULD AFFECT THE MARKETABILITY AND THE MARKET VALUE OF THE NOTES. FOR MORE INFORMATION, SEE ALSO "*DISCUSSION OF RECENT FINANCIAL OPERATING RESULTS AND* PROJECTED *CUMULATIVE DEFICIT*", HEREIN.

Proposals for the Notes will be received on October 14, 2026 at the offices of Munistat Services, Inc., 12 Roosevelt Avenue, Port Jefferson Station, New York 11776.

The Notes are offered subject to the final approving opinion of Hawkins Delafield & Wood LLP, New York, New York, Bond Counsel, and certain other conditions. Munistat Services, Inc. has served as Municipal Advisor to the District in connection with the issuance of the Notes. It is expected that delivery of the Notes will be made in New York, New York or as otherwise agreed on or about the Date of Issue stated above.

THIS PRELIMINARY OFFICIAL STATEMENT IS IN A FORM "*DEEMED FINAL*" BY THE DISTRICT FOR THE PURPOSES OF SECURITIES AND EXCHANGE COMMISSION RULE 15c2-12 (THE "*RULE*"). FOR A DESCRIPTION OF THE DISTRICT'S AGREEMENT TO PROVIDE NOTICE OF EVENTS FOR THE NOTES, AS DESCRIBED IN THE RULE, SEE "*DISCLOSURE UNDERTAKING*" HEREIN.

October , 2026

*Preliminary, subject to change.

GREENPORT UNION FREE SCHOOL DISTRICT
SUFFOLK COUNTY, NEW YORK

720 Front Street
Greenport, New York 11944
Telephone: (631) 477-1950
Fax: (631) 593-8950

BOARD OF EDUCATION

Jaime Martilotta, President

Kirsten Droskoski, Vice-President
Amanda Clark
Sam Strickland
Emily Whitecavage

Elizabeth Doyle, Superintendent of Schools
Charles Scheid, Assistant Superintendent for Business
Diana Reynolds, District Treasurer
Sandra Nuzzi, District Clerk

SCHOOL DISTRICT COUNSEL

Ingerman Smith LLP
Hauppauge, New York

* * *

BOND COUNSEL

HAWKINS

Hawkins Delafield & Wood LLP
New York, New York

* * *

MUNICIPAL ADVISOR

Munistat
Municipal Financial Advisory Service
Since 1977

12 Roosevelt Avenue
Port Jefferson Station, N.Y. 11776
(631) 331-8888

E-mail: info@munistat.com
Website: www.munistat.com

No dealer, broker, salesman or other person has been authorized by the District to give any information or to make any representations, other than those contained in this Official Statement and if given or made, such other information or representations must not be relied upon as having been authorized by the foregoing. This Official Statement does not constitute an offer to sell or the solicitation of an offer to buy, nor is there any sale of the Notes by any person in any jurisdiction in which it is unlawful for such person to make such offer, solicitation or sale. The information set forth herein has been obtained by the District from sources which are believed to be reliable but it is not guaranteed as to accuracy or completeness. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in the affairs of the District since the date hereof.

TABLE OF CONTENTS

Page

THE NOTES **1**
- Description 1
- No Optional Redemption 1
- Description of Book-Entry System 1
- Authorization for and Purpose of Notes 3
- Security and Source of Payment 3

REMEDIES UPON DEFAULT **3**

SECTION 99-B OF THE STATE FINANCE LAW APPLICABLE TO SCHOOL DISTRICTS **5**

NO PAST DUE DEBT **5**

BANKRUPTCY **5**

THE DISTRICT **6**
- Description 6
- District Organization 6
- Enrollment History 6
- Projected Future Enrollment 7
- District Facilities 7
- Employees 7

ECONOMIC AND DEMOGRAPHIC INFORMATION **7**
- Population Trends 7
- Income Data 8
- Major Employers in the Town of Southold 8
- Unemployment Rate Statistics 8

INDEBTEDNESS OF THE DISTRICT **9**
- Constitutional and Statutory Requirements 9
- Statutory Procedure 9
- Computation of Debt Limit and Debt Contracting Margin 10
- Details of Short-Term Indebtedness Outstanding 10
- Trend of Outstanding Indebtedness 10
- Debt Service Requirements - Outstanding Bonds 11
- Revenue and Tax Anticipation Notes 11
- Authorized and Unissued Debt 11
- Calculation of Estimated Overlapping and Underlying Indebtedness 12
- Debt Ratios 12

FINANCES OF THE DISTRICT **12**
- Discussion Of Recent Financial Operating Results and Projected Cumulative Deficit 12
- Unaudited Results for Fiscal Year Ended June 30, 2026 13
- Adopted Budget for Fiscal Year Ending June 30, 2027 14
- Independent Audit 14
- Investment Policy 15
- Fund Structure and Accounts 15
- Basis of Accounting 15

TABLE OF CONTENTS - CONTINUED

Page

BUDGET PROCESS 15
REVENUES 16
Real Property Taxes 16
State Aid 16
State Aid Litigation 17
State Aid History 18
EXPENDITURES 19
THE STATE COMPTROLLER'S FISCAL STRESS MONITORING SYSTEM AND OSC COMPLIANCE REVIEWS 19
EMPLOYEE PENSION BENEFITS 19
OTHER POST-EMPLOYMENT BENEFITS 20

TAX INFORMATION 22
REAL PROPERTY TAXES 22
TAX COLLECTION PROCEDURE 22
THE TAX LEVY LIMIT LAW 22
STAR - SCHOOL TAX EXEMPTION 23
VALUATIONS, RATES AND LEVIES 24
SELECTED LISTING OF LARGE TAXABLE PROPERTIES IN THE DISTRICT 24
TAX CERTIORARI CLAIMS 24

LITIGATION 24

CYBERSECURITY 25

RISK FACTORS 25

TAX MATTERS 26
OPINION OF BOND COUNSEL 26
CERTAIN ONGOING FEDERAL TAX REQUIREMENTS AND CERTIFICATIONS 26
CERTAIN COLLATERAL FEDERAL TAX CONSEQUENCES 27
ORIGINAL ISSUE DISCOUNT 27
NOTE PREMIUM 27
INFORMATION REPORTING AND BACKUP WITHHOLDING 28
MISCELLANEOUS 28

LEGAL MATTERS 28

DISCLOSURE UNDERTAKING 28

RATING 28

MUNICIPAL ADVISOR 29

ADDITIONAL INFORMATION 29

APPENDIX A: FINANCIAL INFORMATION
APPENDIX B: CASH FLOWS
APPENDIX C: AUDITED FINANCIAL STATEMENTS FOR THE FISCAL YEAR ENDED JUNE 30, 2025
APPENDIX D: FORM OF APPROVING LEGAL OPINION OF BOND COUNSEL
APPENDIX E: FORM OF EVENTS NOTICE UNDERTAKING

OFFICIAL STATEMENT

GREENPORT UNION FREE SCHOOL DISTRICT
SUFFOLK COUNTY, NEW YORK

Relating To

$5,000,000* TAX ANTICIPATION NOTES FOR 2026-2027 TAXES
(the "Notes")

This Official Statement, including the cover page and appendix hereto, presents certain information relating to the Greenport Union Free School District, in the County of Suffolk, State of New York (the "District," "County" and "State," respectively) in connection with the sale of $5,000,000* Tax Anticipation Notes For 2026-2027 Taxes (the "Notes").

All quotations from and summaries and explanations of provisions of the Constitution and laws of the State and acts and proceedings of the District contained herein do not purport to be complete and are qualified in their entirety by reference to the official compilations thereof and all references to the Notes and the proceedings of the District relating thereto are qualified in their entirety by reference to the definitive form of the Notes and such proceedings.

THE DISTRICT HAS EXPERIENCED A SIGNIFICANT DETERIORATION IN ITS FINANCIAL POSITION IN RECENT YEARS AS A RESULT OF STRUCTURAL OPERATING IMBALANCES THAT HAVE CAUSED A SUBSTANTIAL DRAWDOWN OF THE DISTRICT'S FUND BALANCE AND RESERVES. THE DISTRICT EXPECTS ANOTHER OPERATING DEFICIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026, RESULTING IN A PROJECTED CUMULATIVE UNASSIGNED GENERAL FUND DEFICIT OF APPROXIMATELY $545,000. THE ACTUAL AMOUNT OF SUCH CUMULATIVE DEFICIT IS NOT EXPECTED TO BE KNOWN UNTIL THE AUDIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026 HAS BEEN COMPLETED, WHICH IS EXPECTED TO BE ON OR ABOUT OCTOBER 20, 2026.

THE FOREGOING COULD AFFECT THE MARKETABILITY AND THE MARKET VALUE OF THE NOTES. FOR MORE INFORMATION, SEE ALSO "*DISCUSSION OF RECENT FINANCIAL OPERATING RESULTS AND* PROJECTED *CUMULATIVE DEFICIT*", HEREIN.

THE NOTES

Description

The Notes will be dated and will mature, without option of prior redemption, as reflected on the cover page hereof.

The District will act as Paying Agent for any Notes issued in book-entry form and the purchaser(s) will serve as paying agent for the Notes registered in the name of the purchaser(s). Paying agent fees, if any, will be paid by the purchaser(s). The District's contact information is as follows: Charles Scheid, Assistant Superintendent for Business, Greenport Union Free School District, 720 Front Street, Greenport, NY 11944, Phone (631) 477-1950, Fax (631) 593-8950 and email: cscheid@gufsd.org.

No Optional Redemption

The Notes will not be subject to redemption prior to their maturity.

Description of Book-Entry System

In the event that the Notes are issued in book-entry form, DTC will act as securities depository for the Notes and the Notes will be issued as fully-registered notes registered in the name of Cede & Co., (DTC's partnership nominee) or such other name as may be requested by an authorized representative of DTC. One fully-registered note certificate will be issued for each Note bearing the same rate of interest and CUSIP number and will be deposited with DTC.

*Preliminary, subject to change.

DTC, the world's largest depository, is a limited-purpose trust company organized under the New York Banking Law, a "banking organization" within the meaning of the New York Banking Law, a member of the Federal Reserve System, a "clearing corporation" within the meaning of the New York Uniform Commercial Code, and a "clearing agency" registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC's participants ("Direct Participants") deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants' accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations. DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation ("DTCC"). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies.

*Preliminary, subject to change.

DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly ("Indirect Participants"). The DTC Rules applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at www.dtcc.com and www.dtc.org.

Purchases of the Notes under the DTC system must be made by or through Direct Participants, which will receive a credit for the Notes on DTC's records. The ownership interest of each actual purchaser of each bond ("Beneficial Owner") is in turn to be recorded on the Direct and Indirect Participants' records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the Notes are to be accomplished by entries made on the books of Direct and Indirect Participants acting on behalf of Beneficial Owners. Beneficial Owners will not receive certificates representing their ownership interests in the Notes, except in the event that use of the book-entry system for the Notes is discontinued.

To facilitate subsequent transfers, all Notes deposited by Direct Participants with DTC are registered in the name of DTC's partnership nominee, Cede & Co., or such other name as may be requested by an authorized representative of DTC. The deposit of the Notes with DTC and their registration in the name of Cede & Co. or such other DTC nominee do not effect any change in beneficial ownership. DTC has no knowledge of the actual Beneficial Owners of the Notes; DTC's records reflect only the identity of the Direct Participants to whose accounts such Notes are credited, which may or may not be the Beneficial Owners. The Direct and Indirect Participants will remain responsible for keeping account of their holdings on behalf of their customers.

Conveyance of notices and other communications by DTC to Direct Participants, by Direct Participants to Indirect Participants, and by Direct Participants and Indirect Participants to Beneficial Owners will be governed by arrangements among them, subject to any statutory or regulatory requirements as may be in effect from time to time.

Redemption notices shall be sent to DTC. If less than all of the Securities within an issue are being redeemed, DTC's practice is to determine by lot the amount of the interest of each Direct Participant in such issue to be redeemed.

Neither DTC nor Cede & Co. (nor any other DTC nominee) will consent or vote with respect to the Notes unless authorized by a Direct Participant in accordance with DTC's MMI Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to the District as soon as possible after the record date. The Omnibus Proxy assigns Cede & Co.'s consenting or voting rights to those Direct Participants to whose accounts the Notes are credited on the record date (identified in a listing attached to the Omnibus Proxy).

Principal and interest payments on the Notes will be made to Cede & Co., or such other nominee as may be requested by an authorized representative of DTC. DTC's practice is to credit Direct Participants' accounts upon DTC's receipt of funds and corresponding detail information from the District, on payable date in accordance with their respective holdings shown on DTC's records. Payments by Participants to Beneficial Owners will be governed by standing instructions and customary practices, as is the case with securities held for the accounts of customers in bearer form or registered in "street name," and will be the responsibility of such Participant and not of DTC or the District, subject to any statutory or regulatory requirements as may be in effect from time to time. Payment of principal and interest payments to Cede & Co. (or such other nominee as may be requested by an authorized representative of DTC) is the responsibility of the District, disbursement of such payments to Direct Participants will be the responsibility of DTC, and disbursement of such payments to the Beneficial Owners will be the responsibility of Direct and Indirect Participants.

DTC may discontinue providing its services as depository with respect to the Notes at any time by giving reasonable notice to the District. Under such circumstances, in the event that a successor depository is not obtained, note certificates are required to be printed and delivered.

The District may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, note certificates will be printed and delivered to DTC.

The information in this section concerning DTC and DTC's book-entry system has been obtained from sources that the District believes to be reliable, but the District takes no responsibility for the accuracy thereof.

Source: The Depository Trust Company

Authorization for and Purpose of Notes

The Notes are issued pursuant to the Constitution and laws of the State, including Sections 24.00 and 39.00 of the Local Finance Law, constituting Chapter 33-a of the Consolidated Laws of New York, and a tax anticipation note resolution adopted by the Board of Education of the District to finance cash flow requirements in anticipation of the collection of 2026-2027 real property taxes levied for school purposes on all taxable real property in the District. The proceeds of the Notes may be used only for the purposes for which such taxes have been or are to be levied, as specified in the 2026-2027 annual budget of the District, unless all of said purposes have been paid and satisfied, in which case the proceeds of the notes may be used for any lawful school purpose. The proceeds of the Notes will not be used for the redemption or renewal of any outstanding tax anticipation or revenue anticipation notes.

Pursuant to Section 24.00(e) of the Local Finance Law, generally, whenever the amount of the Notes and any additional tax anticipation notes issued by the District in anticipation of the receipt of 2026-2027 real property taxes equals the amount of such taxes remaining uncollected, the District is required to set aside in a special bank account all of such uncollected taxes as thereafter collected, and to use the amounts so set aside only for the purpose of paying such Notes. Interest on the Notes will be provided from budget appropriations.

Security and Source of Payment

Each Note when duly issued and paid for will constitute a contract between the District and the holder thereof.

The Notes will be general obligations of the District and will contain a pledge of the faith and credit of the District for the payment of the principal thereof and the interest thereon. For the payment of such principal of and interest on the Notes, the District has the power and statutory authorization to levy ad valorem taxes on all taxable real property in the District, subject to certain statutory limitations. See "*The Tax Levy Limit Law*" herein.

Under the Constitution of the State, the District is required to pledge its faith and credit for the payment of the principal of and interest on the Notes, and the State is specifically precluded from restricting the power of the District to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted. However, the Tax Levy Limit Law, (herein referred to as the "Tax Levy Limit Law" or "Law"), imposes a limitation on the power of local governments and school districts, including the District, to increase their annual tax levy, with the amount of such year to year increase limited by the formulas set forth in the Tax Levy Limit Law. The Tax Levy Limit Law also provides the procedural method to overcome that limitation. In addition, the Tax Levy Limit Law expressly provides an exclusion from the annual tax levy limitation for any taxes levied to pay the local share of debt service on bonds or notes issued to finance voter approved capital expenditures, or the refinancing or refunding of such bonds or notes. The exclusion does NOT apply to taxes to pay debt service on tax anticipation notes (such as the Notes), revenue anticipation notes, budget notes and deficiency notes, and any obligations issued to finance deficits and certain judgments, including tax certiorari refund payments. (See "*The Tax Levy Limit Law,"* herein.)

REMEDIES UPON DEFAULT

Neither the Notes, nor the proceedings with respect thereto, specifically provide any remedies which would be available to owners of the Notes should the District default in the payment of principal of or interest on the Notes, nor do they contain any provisions for the appointment of a trustee to enforce the interests of the owners of the Notes upon the occurrence of any such default. The Notes are general obligation contracts between the District and the owners for which the faith and credit of the District are pledged and while remedies for enforcement of payment are not expressly included in the District's contract with such owners, any permanent repeal by statute or constitutional amendment of a bondholder's and/or noteholder's remedial right to judicial enforcement of the contract should, in the opinion of Bond Counsel, be held unconstitutional.

Upon default in the payment of principal of or interest on the Notes at the suit of the owner, a Court has the power, in proper and appropriate proceedings, to render judgment against the District. The present statute limits interest on the amount adjudged due to contract creditors to nine per centum per annum from the date due to the date of payment. As a general rule, property and funds of a municipal corporation serving the public welfare and interest have not been judicially subjected to execution or attachment to satisfy a judgment. A Court also has the power, in proper and appropriate proceedings, to order payment of a judgment on such bonds or notes from funds lawfully available therefor or, in the absence thereof, to order the District to take all lawful action to obtain the same, including the raising of the required amount in the next annual tax levy. In exercising its discretion as to whether to issue such an order, the Court may take into account all relevant factors, including the current operating needs of the District and the availability and adequacy of other remedies. Upon any default in the payment of the principal of or interest on the Notes, the owner of such Notes could, among other remedies, seek to obtain a writ of mandamus from a Court ordering the governing body of the District to assess, levy and collect an ad valorem tax, upon all taxable property of the District subject to taxation by the District sufficient to pay the principal of and interest on the Notes as the same shall come due and payable (and interest from the due date to date of payment) and otherwise to observe the covenants contained in the Notes and the proceedings with respect thereto all of which are included in the contract with the owners of the Notes. The mandamus remedy, however, may be impracticable and difficult to enforce. Further, the right to enforce payment of the principal of or interest on the Notes may be limited by bankruptcy, insolvency, reorganization, moratorium and similar laws and equitable principles, which may limit the specific enforcement of certain remedies.

In 1976, the New York Court of Appeals, the State's highest court, held in *Flushing National Bank* v. *Municipal Assistance Corporation for the City of New York*, 40 N.Y.2d 731 (1976), that the New York State legislation purporting to postpone the payment of debt service on New York City obligations was an unconstitutional moratorium in violation of the New York State constitutional faith and credit mandate included in all municipal debt obligations. While that case can be viewed as a precedent for protecting the remedies of Noteholders, there can be no assurance as to what a Court may determine with respect to future events, including financial crises as they may occur in the State and in municipalities of the State, that require the exercise by the State of its emergency and police powers to assure the continuation of essential public services. (See also, *Flushing National Bank* v. *Municipal Assistance Corporation for the City of New York*, 40 N.Y.2d 1088 (1977), where the Court of Appeals described the pledge as a direct Constitutional mandate.)

As a result of the Court of Appeals decision, the constitutionality of that portion of Title 6-A of Article 2 of the Local Finance Law enacted at the 1975 Extraordinary Session of the State legislature authorizing any county, city, town or village with respect to which the State has declared a financial emergency to petition the State Supreme Court to stay the enforcement against such municipality of any claim for payment relating to any contract, debt or obligation of the municipality during the emergency period, is subject to doubt. In any event, no such emergency has been declared with respect to the District.

Pursuant to Article VIII, Section 2 of the State Constitution, the District is required to provide an annual appropriation of monies for the payment of due and payable principal of and interest on indebtedness. Specifically, this constitutional provision states: "If at any time the respective appropriating authorities shall fail to make such appropriations, a sufficient sum shall be set apart from the first revenues thereafter received and shall be applied to such purposes. The fiscal officer of any county, city, town, village or school district may be required to set aside and apply such revenues as aforesaid at the suit of any holder of obligations issued for any such indebtedness." This constitutes a specific non-exclusive constitutional remedy against a defaulting municipality or school district; however, it does not apply in a context in which monies have been appropriated for debt service but the appropriating authorities decline to use such monies to pay debt service. However, Article VIII, Section 2 of the Constitution of the State also provides that the fiscal officer of any county, city, town, village or school district may be required to set apart and apply such revenues at the suit of any holder of any obligations of indebtedness issued with the pledge of the faith of the credit of such political subdivision. In *Quirk* v. *Municipal Assistance Corp*., 41 N.Y.2d 644 (1977), the Court of Appeals described this as a "first lien" on revenues, but one that does not give holders a right to any particular revenues. It should thus be noted that the pledge of the faith and credit of a political subdivision in the State is a pledge of an issuer of a general obligation bond or note to use its general revenue powers, including, but not limited to, its property tax levy, to pay debt service on such obligations, but that such pledge may or may not be interpreted by a court of competent jurisdiction to include a constitutional or statutory lien upon any particular revenues. The Constitutional provision providing for first revenue set asides does not apply to tax anticipation notes, revenue anticipation notes or bond anticipation notes.

While the courts in the State have historically been protective of the rights of holders of general obligation debt of political subdivisions, it is not possible to predict what a future court might hold.

In prior years, certain events and legislation affecting a holder's remedies upon default have resulted in litigation. While courts of final jurisdiction have generally upheld and sustained the rights of bondholders and/or noteholders, such courts might hold that future events, including a financial crisis as such may occur in the State or in political subdivisions of the State, may require the exercise by the State or its political subdivisions of emergency and police powers to assure the continuation of essential public services prior to the payment of debt service.

SECTION 99-B OF THE STATE FINANCE LAW APPLICABLE TO SCHOOL DISTRICTS

Section 99-b of the State Finance Law (the "SFL") provides for a covenant between the State and the purchasers and the holders and owners from time to time of the bonds and notes issued by school districts in the State for school purposes that it will not repeal, revoke or rescind the provisions of Section 99-b of the SFL, or amend or modify the same so as to limit, impair or impede the rights and remedies granted thereby.

Said section provides that in the event a holder or owner of any bond or note issued by a school district for school purposes shall file with the State Comptroller, a verified statement describing such bond or note and alleging default in the payment thereof or the interest thereon or both, it shall be the duty of the State Comptroller to immediately investigate the circumstances of the alleged default and prepare and file in his office a certificate setting forth his determinations with respect thereto and to serve a copy thereof by registered mail upon the chief fiscal officer of the school district which issued the bond or note. Such investigation by the State Comptroller shall set forth a description of all such bonds and notes of the school district found to be in default and the amount of principal and interest thereon past due.

Upon the filing of such a certificate in the office of the State Comptroller, he shall thereafter deduct and withhold from the next succeeding allotment, apportionment or payment of such State aid or assistance due to such school district such amount thereof as may be required to pay (a) the school district's contribution to the State Teachers' Retirement System, and (b) the principal of and interest on such bonds and notes of such school district then in default. In the event such State aid or assistance initially so withheld shall be insufficient to pay said amounts in full, the State Comptroller shall similarly deduct and withhold from each succeeding allotment, apportionment or payment of such State aid or assistance due such school district such amount or amounts thereof as may be required to cure such default. Allotments, apportionments and payments of such State aid so deducted or withheld by the State Comptroller for the payment of principal and interest on the bonds and notes shall be forwarded promptly to the paying agent or agents for the bonds and notes in default of such school district for the sole purpose of the payment of defaulted principal of and interest on such bonds or notes. If any such successive allotments, apportionments or payment of such State aid so deducted or withheld shall be less than the amount of all principal and interest on the bonds and notes in default with respect to which the same was so deducted or withheld, then the State Comptroller shall promptly forward to each paying agent an amount in the proportion that the amount of such bonds and notes in default payable to such paying agent bears to the total amount of the principal and interest then in default on such bonds and notes of such school district. The State Comptroller shall promptly notify the chief fiscal officer of such school district of any payment or payments made to any paying agent or agents of defaulted bonds or notes pursuant to said section of the SFL.

NO PAST DUE DEBT

No principal or interest payment on District indebtedness is past due. The District has never defaulted in the payment of the principal of and/or interest on any indebtedness.

BANKRUPTCY

The Federal Bankruptcy Code (Chapter IX) allows public bodies, such as municipalities, recourse to the protection of a Federal Court for the purpose of adjusting outstanding indebtedness. Title 6-A of the Local Finance Law specifically authorizes any municipality in the State or its emergency control board to file a petition under any provision of Federal bankruptcy law for the composition or adjustment of municipal indebtedness. While this Local Finance Law provision does not apply to school districts, there can be no assurance that it will not become applicable in the future. As such, the undertakings of the District should be considered with reference, specifically, to Chapter IX, and, in general, to other bankruptcy laws affecting creditors' rights and municipalities. Bankruptcy proceedings by the District if authorized by the State in the future could have adverse effects on bondholders and/or noteholders including (a) delay in the enforcement of their remedies, (b) subordination of their claims to those supplying goods and services to the District after the initiation of bankruptcy proceedings and to the administrative expenses of bankruptcy proceedings and (c) imposition without their consent of a reorganization plan reducing or delaying payment of the Notes.

The above references to said Chapter IX are not to be construed as an indication that the State will consent in the future to the right of the District to file a petition with any United States district court or court of bankruptcy under any provision of the laws of the United States, now or hereafter in effect for the composition or adjustment of municipal indebtedness or that the District is currently considering or expects to resort to the provisions of Chapter IX if authorized to do so in the future.

THE DISTRICT

Description

The District is located on the north fork of eastern Long Island in the Town of Southold, approximately 100 miles east of midtown New York City. The District encompasses a land area of approximately five square miles and includes the Village of Greenport. Peconic and Gardiners Bays provide access to Long Island Sound and the Atlantic Ocean. Commercial year-round ferry service is available to Shelter Island and rail service connecting the District to New York City and western Long Island is provided by the Long Island Rail Road. In addition, New York State Route 25 connects the District to Orient Point where high-speed ferry passenger service from New England is available year-round.

The District is primarily residential in nature, with the majority of residences being single-family homes, with some townhouse condominiums and apartment houses. The population of the District is estimated at 4,000 and population does increase significantly during the summer months as there are a large number of vacation residences within the District. The Town of Southold Police Department provides police protection in the District, with fire protection provided by local volunteer fire service. Electric, water and sewer utilities within the District are provided by the Village of Greenport to the resident within the boundaries of the Village and by PSEG Long Island and Suffolk County Water Authority to those District residents located outside the Village of Greenport. National Grid provides natural gas service to District residents. Eastern Long Island Hospital is located within the District and services the District and surrounding areas.

The economy consists of small businesses, many focusing on the service sectors supporting tourism and fishing. In addition, there are several commercial enterprises. The area is a year-round tourist destination offering access to boating, fishing, golf, dining, shopping and the local vineyards and wine-making industry. In recent years, the District has undergone significant economic development, including the development of Mitchell Park in downtown Greenport, which includes newly installed docking facilities, a scenic walkway, a waterfront amphitheater and an antique carousel housed in a glass pavilion. The area also includes the *Peconic Landing*, a not-for-profit waterfront retirement community. This development activity has provided significant increases in the District's tax-base, with *Peconic Landing* alone contributing more than $1 million in assessed value.

The District operates from a single building with a capacity of 1,000 pupils serving grades Pre-K through 12. Enrollment in the past five years averaged approximately 655 students. Enrollment is expected to remain relatively stable over the course of the next five years.

District Organization

The Board of Education, which is the policy-making body of the District, consists of five members with overlapping three-year terms so that as nearly an equal number as possible is elected to the Board each year. The President and the Vice President are elected by the Board members.

The administrative officers of the District, whose duty it is to implement the policies of the Board of Education (the "Board") and who are appointed by the Board, include the Superintendent of Schools, the Assistant Superintendent for Business, the District Clerk, and the School District Treasurer.

Enrollment History

The following table presents the past school enrollment for the District.

School Year	School Enrollment
2022	658
2023	678
2024	677
2025	659
2026	610

Source: District Officials.

Projected Future Enrollment

The following table presents the projected future school enrollment for the District.

School Year	School Enrollment
2027	605
2028	600
2029	595

Source: District Officials.

District Facilities

The District operates twelve schools and offices; statistics relating to each are shown below.

Name of Building	Grades	Date of Construction	Last Addition	Capacity
Greenport School	Pre-K-12	1933	2025	1,000

Employees

The collective bargaining agents, if any, which represent employees and the dates of expirations of the various collective bargaining agreements are as follows:

Name of Union	Expiration Date of Contract	Approx. No. of Members
Greenport Teachers Association	06/30/2028	87
Civil Service Employees' Association	06/30/2028	52
Non-Unit Administrators & Staff	N/A	5
Greenport Administrators' Association	06/30/2028	3

ECONOMIC AND DEMOGRAPHIC INFORMATION

Population Trends

The following table sets forth population statistics.

Year	Town of Southold	Suffolk County	New York State
2000	20,599	1,419,369	18,976,457
2010	23,175	1,518,475	19,541,453
2020	22,177	1,481,364	19,514,849
2024	23,905	1,535,909	19,867,248

Source: Long Island Power Authority and U.S. Bureau of the Census.

Income Data

Income Data is not available for the District as such. The smallest areas for which such statistics are available (which include the District) are the Town of Southold and the County of Suffolk. The information set forth below with respect to such Town, County and State is included for information purposes only. It should not be implied from the inclusion of such data in this Statement that the District is necessarily representative of the Town, County or State or vice versa.

	Per Capita Money Income			
	2000	2010	2020	2024[a]
Town of Southold	$27,619	$41,450	$56,282	$71,607
County of Suffolk	26,577	35,411	46,466	55,574
State of New York	23,389	30,791	40,898	51,002

	Median Household Income			
	2000	2010	2020	2024[a]
Town of Southold	$49,898	$83,240	$87,109	$116,667
County of Suffolk	65,288	84,235	105,362	126,863
State of New York	51,691	67,405	71,117	85,820

Source: United States Bureau of the Census.
a. Based on American Community Survey 5-Year Estimate (2020-2024).

Major Employers in the Town of Southold

Company	Product or Type	Approx. No. of Employees
Eastern Long Island Hospital	Hospital	468
Mattituck-Cutchogue UFSD	Public School	380
Plum Island ADC	U.S. Govt. Facility	350
Town of Southold	Local Government	273
Peconic Landing	Life Care Community	314
Southold UFSD	Public School	171
San Simeon by the Sound	Nursing Home	220
Greenport UFSD	Public School	120

Source: Town of Southold recently published Official Statement

Unemployment Rate Statistics

Unemployment statistics are not available for the District as such. The smallest area for which such statistics are available (which includes the District) is the County of Suffolk. The information set forth below with respect to such County of Suffolk is included for information purposes only. It should not be implied from the inclusion of such data in this Statement that the District is necessarily representative of the County, or vice versa.

Annual Averages:	Suffolk County	New York State
2021	4.9	7.2
2022	3.1	4.4
2023	3.2	4.2
2024	3.5	4.3
2025	3.5	4.2
2026 (YTD)	3.8	4.5

Source: Department of Labor, State of New York.

INDEBTEDNESS OF THE DISTRICT

Constitutional and Statutory Requirements

The New York State Constitution and Local Finance Law limit the power of the District (and other municipalities and school districts of the State) to issue obligations and to contract indebtedness. Such constitutional and statutory limitations include the following, in summary form, and are generally applicable to the District and the Notes:

Purpose and Pledge. The District shall not give or loan any money or property to or in aid of any individual, or private corporation or private undertaking or give or loan its credit to or in aid of any of the foregoing or any public corporation.

The District may contract indebtedness only for a District purpose and shall pledge its faith and credit for the payment of principal of and interest thereon.

Payment and Maturity. Except for certain short-term indebtedness contracted in anticipation of taxes (such as the Notes) or to be paid in one of the two fiscal years immediately succeeding the fiscal year in which such indebtedness was contracted, indebtedness shall be paid in annual installments commencing no later than two years after the date such indebtedness shall have been contracted and ending no later than the period of probable usefulness of the object or purpose determined by statute or, in the alternative, the weighted average period of probable usefulness of the several objects or purpose for which such indebtedness is to be contracted; no installment may be more than fifty per centum in excess of the smallest prior installment, unless the District has authorized the issuance of indebtedness having substantially level or declining annual debt service. The District is required to provide an annual appropriation for the payment of interest due during the year on its indebtedness and for the amounts required in such year for amortization and redemption of its serial bonds, bond anticipation notes and capital notes.

General. The District is further subject to constitutional limitation by the general constitutionally imposed duty on the State Legislature to restrict the power of taxation and contracting indebtedness to prevent abuses in the exercise of such power; however, the State Legislature is prohibited by a specific constitutional provision from restricting the power of the District to levy taxes on real estate for the payment of interest on or principal of indebtedness theretofore contracted. There is no constitutional limitation on the amount that may be raised by the District by tax on real estate in any fiscal year to pay principal of and interest on all indebtedness. However, the Tax Levy Limit Law imposes a statutory limitation on the power of the District to increase its annual tax levy. (See *"The Tax Levy Limit Law"* herein).

Statutory Procedure

In general, the State Legislature has, by the enactment of the Local Finance Law, authorized the powers and procedure for the District to borrow and incur indebtedness subject, of course, to the constitutional provisions set forth above. The power to spend money, however, generally derives from other law, including the Education Law.

The Board of Education, as the finance board of the District, has the power to enact tax anticipation note resolutions. Such resolutions may authorize the issuance of tax anticipation notes in an aggregate principle amount necessary to fund anticipated cash flow deficits but in no event exceeding the amount of real property taxes levied or to be levied by the District, less any tax anticipation notes previously issued and less the amount of such taxes previously received by the District.

The Board of Education, as the finance board of the District, also has the power to authorize the sale and issuance of bonds and notes, including the Notes. However, such finance board may delegate the power to sell the Notes to the President of the Board of Education, the chief fiscal officer of the District, pursuant to the Local Finance Law.

Debt Limit. Pursuant to the Local Finance Law, the District has the power to contract indebtedness for any school district purpose authorized by the Legislature of the State of New York provided the aggregate principal amount thereof shall not exceed ten per centum of the full valuation of the taxable real estate of the District and subject to certain enumerated deductions such as State aid for building purposes. The constitutional and statutory method for determining full valuation is by taking the assessed valuation of taxable real estate for the last completed assessment roll and applying thereto the ratio (equalization rate) which such assessed valuation bears to the full valuation; such ratio is determined by the State Board of Real Property Services. The Legislature also is required to prescribe the manner by which such ratio shall be determined by such authority.

The following table sets forth the computation of the debt limit of the District and its debt contracting margin:

Computation of Debt Limit and Debt Contracting Margin
(As of October 1, 2026)

In Town of:	Assessed Valuation	State Equalization Rate (%)	Full Valuation
Southold (2025-2026) [a]	$15,609,673	0.54	$2,890,680,185
Total			$2,890,680,185
Debt Limit - 10% of Full Valuation			$289,068,019
Inclusions: [b]			
Outstanding Bonds			$18,730,000
Bond Anticipation Notes			0
Total Indebtedness			18,730,000
Exclusions (Estimated Building Aid) [c]			1,798,080
Total Net Indebtedness			16,931,920
Net Debt Contracting Margin			$272,136,099
Per Cent of Debt Contracting Margin Exhausted			5.86%

a. The latest completed assessment roll for which a State Equalization Rate has been established.
b. Tax Anticipation Notes, Energy Performance Lease and Revenue Anticipation Notes are not included in computation of the debt contracting margin of the District.
c. Represents estimate of moneys receivable by the District from the State as an apportionment for debt service for school building purposes, based on the most recent information received by the District from the State Department of Education. The amount shown is not necessarily the amount the District will ultimately receive. The District has not applied for a building aid exclusion certificate from the Commissioner of Education and therefore may not exclude such amount from its total indebtedness on the Debt Statement form required to be filed with the Office of the State Comptroller when notes are to be issued.

Details of Short-Term Indebtedness Outstanding

As of the date of the Official Statement, the District has no short-term debt outstanding.

Trend of Outstanding Indebtedness

	Fiscal Year Ending June 30:				
	2022	2023	2024	2025	2026
Bonds	$5,015,000	$4,620,000	$4,210,000	$3,780,000	$18,730,000
BANs	9,000,000	17,101,000	16,940,000	16,565,000	0
Other	128,647	65,929	0	0	0
Totals:	$14,143,647	$21,786,929	$21,150,000	$20,345,000	$18,730,000

Source: Audited Financial Statements (2022-2025), Unaudited Financials (2026).

Debt Service Requirements - Outstanding Bonds

The following table shows the debt service requirements to maturity on the District's outstanding bonded indebtedness, not including payments made to date.

Fiscal Year Ending June 30:	Principal	Interest	Total
2027	$1,200,000	$781,418	$1,981,418
2028	1,255,000	725,575	1,980,575
2029	1,310,000	667,550	1,977,550
2030	1,365,000	613,100	1,978,100
2031	1,415,000	558,350	1,973,350
2032	1,475,000	501,250	1,976,250
2033	1,095,000	445,950	1,540,950
2034	1,145,000	392,300	1,537,300
2035	1,075,000	338,800	1,413,800
2036	1,115,000	295,800	1,410,800
2037	1,160,000	251,200	1,411,200
2038	1,205,000	204,800	1,409,800
2039	1,255,000	156,600	1,411,600
2040	1,305,000	106,400	1,411,400
2041	1,355,000	54,200	1,409,200
Totals:	$18,730,000	$6,093,293	$24,823,293

Source: Audited Financial Statements.

Revenue and Tax Anticipation Notes

The District has generally found it necessary to borrow from time to time in anticipation of taxes, which borrowing is necessitated by the schedule of real property tax. The District has not found it necessary to borrow in anticipation of State aid revenue payments during the past five years. The following is a history of such tax anticipation note borrowings for the five most recent fiscal years:

Fiscal Year Ending June 30:	Amount	Type	Issue	Maturity
2022	$3,500,000	TAN	11/04/21	06/24/22
2023	3,500,000	TAN	11/03/22	04/03/23
2024	3,500,000	TAN	11/15/23	05/15/24
2025	3,500,000	TAN	11/14/24	05/15/25
2026	3,500,000	TAN	11/13/25	05/13/26

Authorized and Unissued Debt

As of the date of this Statement, the District has no authorized and unissued debt outstanding. (See also "*Details of Short-Term Indebtedness Outstanding*", herein.)

Calculation of Estimated Overlapping and Underlying Indebtedness

	Date of Report	Percentage Applicable (%)	Applicable Total Indebtedness	Applicable Net Indebtedness
County of Suffolk	05/31/2026	0.70	$8,675,917	$7,266,214
Town of Southold	06/18/2026	15.00	5,502,802	5,253,747
Village of Greenport	01/15/2026	100.00	13,425,000	11,240,000
Totals:			$27,603,719	$23,759,960

Sources: Annual Reports of the respective units for the most recently completed fiscal year on file with the Office of the State Comptroller or more recently published Official Statements.

Debt Ratios
(As of October 1, 2026)

	Amount	Per Capita[a]	Percentage Of Full Value (%)[b]
Total Direct Debt	$18,730,000	$3,521	0.648
Net Direct Debt	16,931,920	3,183	0.586
Total Direct & Applicable Total Overlapping Debt	46,333,719	8,709	1.603
Net Direct & Applicable Net Overlapping Debt	40,691,880	7,649	1.408

a. The current population of the District is 5,320.
b. The full valuation of taxable property for 2025-2026 is $2,890,680,185.

FINANCES OF THE DISTRICT

Discussion of Recent Financial Operating Results and Projected Cumulative Deficit

In recent years, the District has experienced a significant deterioration of its financial position as a result of structural operating imbalances in the District's General Fund. Such operating imbalances are due to, but not limited to, the following:

- Reliance of nonrecurring funding sources, including fund balance and federal stimulus funds.
- Adoption of budgets that were not based upon realistic revenue and expenditure trends.
- Failure to monitor budgeted revenues and expenditures in real-time.

Discussion of 2025-2026 Adopted Budget

Revenues and expenditures in the 2025–2026 voter-approved budget totaled $26,959,058 and reflected a 6.2% budget-to-budget increase from the prior year. The 2025-2026 Adopted Budget included a 2.99% property-tax increase, which matched the State's statutory tax cap.

During the 2025-2026 fiscal year, the District identified a projected budgetary shortfall of approximately $2,447,229. During the course of such fiscal year, the District implemented certain mid-year expenditure reduction measures to address the anticipated budgetary shortfall for such fiscal year. Such measures included the following:

- Implemented a Districtwide hiring freeze.
- Did not automatically replace employees who resigned or retired.
- Instituted a spending freeze in November 2025 and limited purchases to essential needs.
- Closely reviewed vacancies, staffing levels, and discretionary expenditures.

As a result of the foregoing, the District underspent the 2025–2026 expenditure budget by approximately $1.3 million. Despite such efforts the District expects that audited results will reflect an operating deficit of $4,863,207 for the year, which includes a voter approved transfer from the General Fund's Capital Reserve to the District's Capital Projects Fund in the amount of $1,970,000.

Unaudited Results for Fiscal Year Ended June 30, 2026

The District expects to release its audited financial statements for the fiscal year ended June 30, 2026 on or about October 20, 2026. The following is a summary of the unaudited results for the General Fund for the period ended June 30, 2026:

Revenues (Including Other Financing Sources):	$ 23,477,984
Expenditures (including transfers):	28,355,476
Excess (Deficit) Revenues Over Expenditures:	(4,863,207)
Total Fund Balance at June 30, 2025:	8,445,405
Total Fund Balance at June 30, 2026:	$ 3,582,198

Source: Unaudited Financial Statements, Preliminary and subject to change. These unaudited financial statements have been prepared by management and have not been audited. They are subject to further adjustments, year-end revisions, and normal closing procedures, which could result in differences from the figures presented herein.

The District's total fund balance for the fiscal year ended June 30, 2026 is expected to be allocated in the following manner.

General Fund:	June 30, 2026
Nonspendable	$ 0
Restricted:	
Workers' compensation	252,706
Unemployment insurance	137,234
Retirement contribution:	
Teachers' retirement system	0
Employees' retirement system	326,138
Employee benefit accrued liability	807,603
Repair	1,424,261
Capital	1,053,881
Property Loss	65,443
Insurance	54,249
Debt Service	4,520
Assigned:	
Appropriated fund balance	0
Unappropriated fund balance	0
Unassigned Fund balance (Deficit)	(543,837)
	$ 3,582,198

Source: Unaudited Financial Statements, Preliminary and subject to change. These unaudited financial statements have been prepared by management and have not been audited. They are subject to further adjustments, year-end revisions, and normal closing procedures, which could result in differences from the figures presented herein.

The District is currently exploring ways to address the unassigned fund balance deficit that exists in the General Fund as of June 30, 2026. Such measures include the liquidation of certain reserves.

Adopted Budget for Fiscal Year Ending June 30, 2027

Revenues and expenditures in the 2026–2027 voter-approved budget totaled $25,995,000 and reflected a 3.58% budget-to-budget decrease from the prior year. The 2026-2027 Adopted Budget includes a 7.91% property-tax increase, which exceeds the State's statutory tax cap. The property tax increase is expected to result in additional recurring tax revenue of $1,491,752. The District did not appropriate any fund balance as part of its 2026-2027 budget but did appropriate the use of reserves in the amount of $278,357. In connection with the development of the District's 2026-2027 budget, the District took the following actions to address the structural imbalance:

- Reduced the overall budget by $964,058, or 3.58%, compared to the 2025–2026 budget.
- Eliminated 21 positions – 10 CSEA positions, 10 Greenport Teachers Association positions, and the Assistant Superintendent position – representing approximately 15% of the District's workforce.
- Restructured and reassigned responsibilities to preserve essential student programs with fewer staff and increased responsibilities for other staff members.
- Reduced additional teaching assignments from approximately $85,000 to approximately $33,000, generating anticipated annual savings of approximately $52,000 while preserving required courses and services.
- Entered into a shared business-official arrangement with Southold Union Free School District, generating approximately $82,000 in annual savings.
- Reviewed out-of-district special education placements and, when determined, appropriate through the Committee on Special Education ("CSE") process, returned students from BOCES placements to appropriate in-district programs, reducing tuition and transportation costs while maintaining required services.
- Transitioned the tuition charged to Oysterponds Union Free School District to the Seneca Falls tuition rate, resulting in a significant increase in recurring tuition revenue.
- Renegotiated the shared Director of Special Education arrangement with Oysterponds Union Free School District, increasing its financial contribution by about $16,000.
- Reduced the District's reliance on reserves to support recurring operating expenses.
- Did not appropriate unassigned fund balance as revenue in the 2026–27 budget.

The District also consulted with a transportation specialist to review bus routes, service levels, and potential efficiencies. This review did not identify savings that could be implemented without affecting required services, however, it is another example of the District's comprehensive examination of major expenditures as part of the development of the 2026-2027 budget.

The implementation of the foregoing measures are designed to address the District's structural imbalance and produce a 2026–2027 budget that can operate at or near break-even, assuming revenues and expenditures perform as projected. Moving forward, the District will closely monitor revenues, expenditures, staffing costs, cash flow, and budget-to-actual performance throughout the year.

Other Cost Saving Initiatives

The District also expects to implement in the 2027-2028 fiscal year cost saving initiatives, including transitioning its healthcare plan to a new plan, which are expected to result in additional annual recurring savings for the District.

Independent Audit

The financial affairs of the District are subject to periodic compliance review by the Office of the State Comptroller to ascertain whether the District has complied with the requirements of various state and federal statutes. The financial statements of the District are audited each year by an independent public accountant. The last such audit covers the fiscal year ended June 30, 2025. A copy of such report is included herein as Appendix C.

Investment Policy

Pursuant to State law, including Sections 10 and 11 of the GML, the District is generally permitted to deposit moneys in banks or trust companies located and authorized to do business in the State. All such deposits, including special time deposit accounts and certificates of deposit, in excess of the amount insured under the Federal Deposit Insurance Act, are required to be secured in accordance with the provisions of and subject to the limitations of Section 10 of the GML.

The District may also temporarily invest moneys in: (1) obligations of the United States of America; (2) obligations guaranteed by agencies of the United States of America where the payment of principal and interest are guaranteed by the United States of America; (3) obligations of the State of New York; (4) with the approval of the New York State Comptroller, in tax anticipation notes or revenue anticipation notes issued by any municipality, school district, or district corporation, other than those notes issued by the District, itself; (5) certificates of participation issued in connection with installment purchase agreements entered into by political subdivisions of the State pursuant to Section 109-b(10) of the GML; (6) obligations of a New York public benefit corporation which are made lawful investments for municipalities pursuant to the enabling statute of such public benefit corporation; or (7) in the case of moneys held in certain reserve funds established by the District pursuant to law, in obligations of the District.

All of the foregoing investments are required to be payable or redeemable at the option of the owner within such times as the proceeds will be needed to meet expenditures for purposes for which the moneys were provided and, in the case of obligations purchased with the proceeds of bonds or notes, shall be payable or redeemable in any event, at the option of the owner, within two years of the date of purchase. Unless registered or inscribed in the name of the District, such instruments and investments must be purchased through, delivered to and held in custody of a bank or trust company in the State pursuant to a written custodial agreement as provided by Section 10 of the GML.

The Board of Education of the District has adopted an investment policy and such policy conforms with applicable laws of the State governing the deposit and investment of public moneys. All deposits and investments of the District are made in accordance with such policy

Fund Structure and Accounts

The General Fund is the general operating fund for the District and is used to account for substantially all revenues and expenditures of the District. The District also maintains a special aid fund and school lunch fund. In addition, a capital projects fund is used to record capital facility projects, while a trust and agency fund accounts for assets received by the District in a fiduciary capacity.

Basis of Accounting

The district-wide and fiduciary fund financial statements are reported on the accrual basis of accounting using the economic resources measurement focus. Revenues are recorded when earned and expenses are recorded at the time liabilities are incurred, regardless of when the related cash transaction takes place. Nonexchange transaction, in which the District gives or receives value without directly receiving or giving equal value in exchange, include real property taxes, grants and donations. On an accrual basis, revenue from real property taxes is recognized in the fiscal year for which the taxes are levied. Revenue from grants and donations is recognized in the fiscal year in which all eligibility requirements have been satisfied and the related expenditures are incurred.

The fund statements are reported on the modified accrual basis of accounting using the current financial resources measurement focus. Revenues are recognized when measurable and available. The District considers all revenue reported in the governmental funds to be available if the revenues are collected within 180 days after the end of the fiscal year, except for real property taxes, which are considered to be available if they are collected within 60 days after the end of the fiscal year.

Expenditures are recorded when the related fund liability is incurred, except for principal and interest on general long-term debt, claims and judgments, and compensated absences, which are recognized as expenditures to the extent they have matured. General capital asset acquisitions are reported as expenditures in governmental funds. Proceeds of general long-term debt and acquisitions under capital leases are reported as other financing sources.

Source: Audited Financials of the District.

Budget Process

The District's fiscal year begins on July 1 and ends on June 30. Starting in the fall or winter of each year, the District's financial plan and enrollment projection are reviewed and updated and the first draft of the next year's proposed budget is developed by the District Office staff. During the winter and early spring, the budget is developed and refined in conjunction with the school building principals and department supervisors. The District's budget is subject to the provisions of the Tax Levy Limit Law, which imposes a limitation on the amount of real property taxes that a school district may levy, and by law is submitted to voter referendum on the third Tuesday of May each year. (See *"The Levy Limit Law"* herein).

On May 19, 2026, a majority of the voters of the District approved the District's budget for the 2026-2027 fiscal year. Summaries of the District's Adopted Budgets for the fiscal years 2025-2026 and for 2026-2027 may be found in Appendix A, herein.

Revenues

The District receives most of its revenue from a real property tax on all non-exempt real property situated within the District and State aid. A summary of such revenues for the five most recently completed fiscal years may be found in Appendix A.

Real Property Taxes

See *"Tax Information"* herein.

State Aid

The District receives appropriations from the State in the form of State aid for operating, building and other purposes at various times throughout its fiscal year, pursuant to formulas and payment schedules set forth by statute. State aid is a substantial percentage of the revenues of the District. While the State has a constitutional duty to maintain and support a system of free common schools that provides a "sound basic education" to children of the State, there can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. State aid appropriated and apportioned to the District can be paid only if the State has such monies available for such payment.

In addition to the amount of State Aid budgeted annually by the District, the State makes payments of STAR aid representing tax savings provided by school districts to their taxpayers under the STAR Program (See "*STAR – School Tax Exemption*" herein).

The State's 2021-22 Enacted Budget and the State's 2022-23 Enacted Budget included significant amounts of federal funding. The State receives a substantial amount of federal aid for health care, education, transportation and other governmental purposes, as well as federal funding to respond to, and recover from, severe weather events and other disasters. Many of the policies that drive federal aid may be subject to change under the federal administration and Congress. Current federal aid projections, and the assumptions on which they rely, are subject to revision. Reductions in federal funding levels could have an a materially adverse impact on the State budget. To date, school districts have received significant funding because of the COVID-19 pandemic from federal stimulus packages and reinstatement of State Foundation Aid, however, the additional federal funding ceased after the 2023-24 fiscal year.

As part of the 2025–26 Enacted State Budget, the Governor and Legislature made targeted adjustments to the Foundation Aid formula. While the formula itself remains largely intact, the budget includes a *hold harmless* provision ensuring that no district receives less Foundation Aid than in the prior year. Additionally, all districts are guaranteed at least a 2% year-over-year increase in Foundation Aid.

The amount of State aid to school districts can vary from year to year and is dependent in part upon the financial condition of the State. During the 2011 to 2019 fiscal years of the State, State aid to school districts was paid in a timely manner; however, during the State's 2010 and 2020 fiscal years, State budgetary restrictions resulted in delayed payments of State aid to school districts in the State. In addition, the availability of State aid and the timeliness of payment of State aid to school districts could be affected by a delay in the adoption of the State budget, which is due at the start of the State's fiscal year of April 1. For the past four years, including the State's current fiscal year, which began on April 1, 2026, the State's budget has been adopted after the April 1 deadline. The budget for the State's 2026-2027 fiscal year was adopted on May 28, 2026 or fifty-seven (57) days late after a series of interim budget bills were enacted. The State's fiscal year 2025-26 Enacted Budget was adopted on May 9, 2025 or thirty-eight (38) days after the April 1 deadline. The State's fiscal year 2024-25 Enacted Budget was adopted on April 22, 2024 or twenty-one (21) days after the April 1 deadline and the State's fiscal year 2023-24 Enacted Budget was adopted on May 2, 2023 or thirty-one (31) days after the April 1 deadline. No assurance can be given that the State will not experience delays in the adoption of the budget in future fiscal years. Significant delays in the adoption of the State budget could result in delayed payment of State aid to school districts in the State which could adversely affect the financial condition of school districts in the State.

In addition to the potential fiscal impact of policies that may be proposed and adopted by the federal administration and Congress, the State budget may be adversely affected by other actions taken by the federal government, including audits, disallowances, and changes to federal participation rates or other Medicaid rules.

There can be no assurance that the State's financial position will not change materially and adversely from current projections. If this were to occur, the State would be required to take additional gap-closing actions. Such actions may include but are not limited to: reductions in State agency operations; delays or reductions in payments to local governments or other recipients of State aid including school districts in the State. Reductions in the payment of State aid could adversely affect the financial condition of school districts in the State, including the District. (See also "*State Aid History*" herein).

Should the District fail to receive State aid expected from the State in the amounts and at the times expected, occasioned by a delay in the payment of such monies or by a mid-year reduction in State aid, the District is authorized by the Local Finance law to provide operating funds by borrowing in anticipation of the receipt of uncollected State Aid.

The following table sets forth the percentage of the District's General Fund revenue comprised of State aid for each of the fiscal years 2021 through 2026, and the amounts budgeted for 2027.

Fiscal Year Ending June 30:	General Fund Total Revenue	State Aid	State Aid to Revenues (%)
2021	$18,876,532	$1,580,579	8.37
2022	20,272,222	1,902,522	9.38
2023	20,200,635	2,253,957	11.16
2024	23,413,381	3,124,869	13.35
2025	23,622,667	3,121,685	13.21
2026 (Unaudited)	23,477,984	3,258,128	13.88
2027 (Budgeted)	25,995,000	3,224,415	12.40

Source: Audited Financial Statements of the District (2021-2025), Unaudited Financial (2026) and Adopted Budget of the District (2027).
a. Budgeted revenues include the application of reserves and fund balance.

State Aid Litigation

In January 2001, the State Supreme Court issued a decision in Campaign for Fiscal Equity v. New York mandating that the system of apportionment of State aid to school districts within the State be restructured by the Governor and the State Legislature. On June 25, 2002, the Appellate Division of the State Supreme Court reversed that decision. On June 26, 2003, the State Court of Appeals, the highest court in the State, reversed the Appellate Division, holding that the State must, by July 30, 2004, ascertain the actual cost of providing a sound basic education, enact reforms to the system of school funding and ensure a system of accountability for such reforms. The Court of Appeals further modified the decision of the Appellate Division by deciding against a Statewide remedy and instead limited its ruling solely to the New York City school system.

After further litigation, on appeal in 2006, the Court of Appeals held that $1.93 billion of additional funds for the New York City schools – as initially proposed by the Governor and presented to the Legislature as an amount sufficient to provide a sound basic education – was reasonably determined. State legislative reforms in the wake of The Campaign for Fiscal Equity decision included increased accountability for expenditure of State funds and collapsing over 30 categories of school aid for school districts in the State into one classroom operating formula referred to as Foundation Aid. The stated purpose of Foundation Aid is to prioritize funding distribution based upon student need. As a result of the Court of Appeals ruling schools were to receive $5.5 billion increase in foundation aid over a four fiscal year phase-in covering 2007 to 2011.

In school district fiscal year 2009-2010, foundation aid funding was frozen by the State Legislature to the prior fiscal year level, and in the fiscal year thereafter foundation aid funding was reduced through a "gap elimination adjustment" as described above, and other aid adjustments. The final phase-in of Foundation Aid as originally projected is now complete. (See also "*School District Fiscal Year (2023-2024)*" under the subheading "*State Aid History*" herein.)

A case related to the Campaign for Fiscal Equity, Inc. v. State of New York was heard on appeal on May 30, 2017 in New Yorkers for Students' Educational Rights v. State of New York ("NYSER") and a consolidated case on the right to a sound basic education. The NYSER lawsuit asserts that the State has failed to comply with the original decision in the Court of Appeals in the Campaign for Fiscal Equity case, and asks the Court of Appeals to require the State to develop new methodologies, formulas and mechanisms for determining State aid, to fully fund the foundation aid formula, to eliminate the supermajority requirement for voter approval of budgets which increase school district property tax levies above the property tax cap limitation, and related matters. On June 27, 2017, the Court of Appeals held that the plaintiffs causes of action were properly dismissed by the earlier Appellate Division decision except insofar as two causes of action regarding accountability mechanisms and sufficient State funding for a "sound basic education" as applicable solely to the school districts in New York City and Syracuse. The Court emphasized its previous ruling in the CFE case that absent "gross education inadequacies", claims regarding State funding for a "sound basic education" must be made on a district-by-district basis based on the specific facts therein. On October 14, 2021 Governor Kathy Hochul announced that New York State has reached an agreement to settle and discontinue the New Yorkers for Students' Educational Rights v. New York State case, following through on the State's commitment to fully fund the current Foundation Aid formula to New York's school districts over three years and ending the State's prior opposition to providing this much-needed funding to our students. The litigation, was initiated in 2014, sought to require New York State to fully fund the Foundation Aid formula that was put into place following the historic Campaign for Fiscal Equity cases, and had been previously opposed by the State. Foundation Aid was created in 2007 and takes school district wealth and

student need into account to create an equitable distribution of state funding to schools, however, New York State has never fully funded Foundation Aid. The new settlement required New York State to phase-in full funding of Foundation Aid by the FY 2024 budget. In the FY 2022 Enacted State Budget approved in April 2021, the Executive and Legislature agreed to fully fund Foundation Aid by the FY 2024 budget and enshrined this commitment into law. A breakdown of Foundation Aid funding is set forth below:

- FY 2022: $19.8 billion, covering 30% of the existing shortfall
- FY 2023: Approximately $21.3 billion, covering 50% of the anticipated shortfall
- FY 2024: Approximately $23.2 billion, eliminating the anticipated shortfall, and funding the full amount of Foundation Aid for all school districts

See also "*State Aid*" herein.

State Aid History

School district fiscal year (2022-2023):The State's 2022-23 Enacted Budget provided $31.5 billion in State funding to school districts for the 2022-23 school year, the highest level of State aid ever at that time. This represented an increase of $2.1 billion or 7.2 percent compared to the 2021-22 school year and included a $1.5 billion or 7.7 percent Foundation Aid increase.

The State's 2022-23 Enacted Budget also programed $14 billion of federal Elementary and Secondary School Emergency Relief and Governor's Emergency Education Relief funds to public schools. This funding, available for use over multiple years, was designed to assist public schools to reopen for in-person instruction, address learning loss, and respond to students' academic, social, and emotional needs due to the disruptions of the COVID-19 pandemic. The State's 2022-23 Enacted Budget allocated $100 million over two years for a new State matching fund for school districts with the highest needs to support efforts to address student well-being and learning loss. In addition, the State's 2022-23 Enacted Budget increased federal funds by $125 million to expand access to full-day prekindergarten programs for four-year-old children in school districts statewide in the 2022-23 school year.

School district fiscal year (2023-2024): The State's 2023-24 Enacted Budget provided $34.5 billion in State funding to school districts for the 2023-24 school year, the highest level of State aid ever at that time. This represented an increase of $3 billion or 9.6 percent compared to the 2022-23 school year, and included a $2.6 billion or 12.1 percent Foundation Aid increase, which fully funded Foundation Aid for the first time in its 17-year history and ensured that each school district received a minimum year-to-year increase of 3 percent.

School district fiscal year (2024-2025): The State's 2024-25 Enacted Budget provided $35.9 billion in State funding to school districts for the 2024-25 school year, the highest level of State aid ever. This represented an increase of $1.3 billion compared to the 2023-24 school year and included a $934 million or 3.89 percent Foundation Aid increase. The State's 2024-25 Enacted Budget maintains the "save harmless" provision, which ensured a school district receives at least the same amount of Foundation Aid as it received in the prior year. The State's 2024-25 Enacted Budget also authorized a comprehensive study by the Rockefeller Institute and the State Department of Education to develop a modernized school funding formula. (See also "*State Aid*" herein.)

School district fiscal year (2025-2026): The State's 2025-26 Enacted Budget provided $37.6 billion in State funding to school districts for the 2025-26 school year, the highest level of State aid ever. This represented an increase of $1.7 billion or 4.9 percent compared to the 2024-25 school year and included a $1.4 billion or 5.6 percent Foundation Aid increase. The State's 2025-26 Enacted Budget included a 2% minimum increase in Foundation Aid to all school districts and makes a number of alterations to the Foundation Aid formula designed to reflect low-income student populations and provide additional aid to low-wealth school districts.

Provisions in the State's 2025-26 Enacted Budget grant the State Budget Director the authority to withhold all or some of the amounts appropriated therein, including amounts that are to be paid on specific dates prescribed in law or regulation (such as State aid) if, on a cash basis of accounting, a "general fund imbalance" has or is expected to occur in fiscal year 2025-26. Specifically, the State's 2025-26 Enacted Budget provided that a "general fund imbalance" has occurred, and the State Budget Director's powers are activated, if any State fiscal year 2025-26 quarterly financial plan update required by Subdivision 4 of Section 23 of the New York State Finance Law reflects, or if at any point during the final quarter of State fiscal year 2025-26 the State Budget Director projects, that estimated general fund receipts and/or estimated general fund disbursements have or will vary from the estimates included in the State's 2025-26 Enacted Budget financial plan required by sections 22 and 23 of the New York State Finance Law results in a cumulative budget imbalance of $2 billion or more. Any significant reductions or delays in the payment of State aid could adversely affect the financial condition of school districts in the State.

School district fiscal year (2026-2027): The State's 2026-27 Enacted Budget provides $39 billion in school aid, reflecting a $1.7 billion increase, and includes $27.4 billion in Foundation Aid with a 2% minimum increase for districts. Additionally, the budget allocates a $561 million increase for Universal Pre-Kindergarten, aiming for full-day instruction for all four-year-olds by the 2028-29 school year, following the official adoption of the $268.1 billion budget.

Provisions in the State's 2026-27 Enacted Budget grant the State Budget Director the authority to withhold all or some of the amounts appropriated therein, including amounts that are to be paid on specific dates prescribed in law or regulation (such as State aid), if, on a cash basis of accounting, a "general fund imbalance" has or is expected to occur in fiscal year 2026-27. Specifically, the State's 2026-27 Enacted Budget provides that a "general fund imbalance" has occurred, and the State Budget Director's powers are activated, if any State fiscal year 2026-27 quarterly financial plan update required by Subdivision 4 of Section 23 of the New York State Finance Law reflects, or if at any point during the final quarter of State fiscal year 2026-27 the State Budget Director projects, that estimated general fund receipts and/or estimated general fund disbursements have or will vary from the estimates included in the State's 2026-27 Enacted Budget financial plan required by Sections 22 and 23 of the New York State Finance Law, resulting in a cumulative budget imbalance of $2 billion or more. Before any payments may be withheld pursuant to this provision, the State Budget Director must first deplete the $2 billion transaction risk reserve accounting mechanism to resolve the determined general fund imbalance, as practicable. Any significant reductions or delays in the payment of State aid could adversely affect the financial condition of school districts in the State.

Expenditures

The major categories of expenditure for the District are General Support, Instruction, Employee Benefits, Pupil Transportation and Debt Service. A summary of the expenditures for the five most recently completed fiscal years may be found in Appendix A.

The State Comptroller's Fiscal Stress Monitoring System and OSC Compliance Reviews

The New York State Comptroller has reported that New York State's school districts and municipalities are facing significant fiscal challenges. As a result, the Office of the State Comptroller has developed a Fiscal Stress Monitoring System ("FSMS") to provide independent, objectively measured and quantifiable information to school districts and municipal officials, taxpayers and policy makers regarding the various levels of fiscal stress under which the State's school districts and municipalities are operating.

The fiscal stress scores are based on financial information submitted as part of each school ST-3 report filed with the State Education Department annually, and each municipality's annual report filed with the Office of the State Comptroller (OSC). Using financial indicators that include year-end fund balance, cash position and patterns of operating deficits, the system creates an overall fiscal stress score which classifies whether a school district or municipality is in "significant fiscal stress", in "moderate fiscal stress," as "susceptible to fiscal stress" or "no designation". Entities that do not accumulate the number of points that would place them in a stress category will receive a financial score but will be classified in a category of "no designation." The system also produces environmental stress scores based primarily on federal Census data. The system's environmental stress indicators are designed to assess factors that may increase a particular local government's exposure to fiscal stress, including: change in population, poverty rate, percentage of nonworking age population, tax base, median income, unemployment rate, and reliance on State and federal aid

The classification should not be interpreted to imply that the entity is completely free of fiscal stress conditions. Rather, the entity's financial information, when objectively scored according to the FSMS criteria, did not generate sufficient points to place them in one of the three established stress categories.

The most current applicable report of OSC designates the District as follows:

Fiscal Score: 35.0% - "Susceptible to Fiscal Stress"
Environmental Score: 31.7% - "Susceptible to Fiscal Stress"

More information on the FSMS may be obtained from the Office of the State Comptroller.

In addition, OSC helps local government officials manage government resources efficiently and effectively. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through its audits, which identify opportunities for improving operations and governance. The most recently completed audit was published June 8, 2022. The purpose of the audit was to determine whether the District used its resources to provide mental health components of the New York Safe Schools Against Violence in Education Act (SAVE Act) training requirement to staff. The complete report may be found on the OSC's official website.

References to websites and/or website addresses presented herein are for informational purposes only. Unless specified otherwise, such websites and the information or links contained therein are not incorporated into, and are not part of, this Statement.

Employee Pension Benefits

New York State Certified employees (teachers and administrators) are members of the New York State Teachers Retirement System ("TRS"). Employer pension payments to the TRS are generally deducted from State aid payments. All non-NYS certified/civil service employees of the District eligible for pension or retirement benefits under the Retirement and Social Security Law of the State of New York are members of the New York State and Local Employee's Retirement System ("ERS"). Both the TRS and ERS are non-contributory with respect to members hired prior to July 1, 1976. Other than as discussed below, all members of the respective systems hired on or after July 1, 1976 with less than 10 year's full-time service contribute 3% of their gross annual salary toward the cost of retirement programs.

The New York State and Local Retirement System ("NYSLRS") provides pension benefits to employees of the State and its political subdivisions, including the District. Employees hired on or after January 1, 2010 and April 1, 2012 are generally members of Tier 5 and Tier 6, respectively, which provide reduced benefits and/or increased employee contribution requirements compared to earlier tiers. In recent years, the State has enacted certain modifications to these tiers, including lowering the vesting period from 10 years to 5 years and a reduction in the Final Average Salary calculation period from five (5) years to three (3) years, which may result in increased pension benefits for affected members.

In addition, the State recently enacted major pension changes for Tier 6 public employees as part of the State's 2026-2027 Enacted Budget. For Tier 6 public employees, these reforms improve benefits, reduce mandatory employee contributions on a sliding salary scale, lower the retirement age for teachers, and increase the cap on overtime that can be calculated into pensions. The changes that were enacted to align Tier 5 and Tier 6 benefits more closely with those available under earlier tiers. Increasing pension benefits or otherwise modifying the NYSLRS is expected to result in increased costs to the State and participating employers, including school districts, which could have an adverse effect on their financial condition.

Under current law, the employer pension payments for a given fiscal year are based on the value of the pension fund on the prior April 1 thus enabling the District to more accurately include the cost of the employer pension payment in its budget for the ensuing year. In addition, the District is required to make a minimum contribution of 4.5% of payroll every year, including years in which the investment performance of the fund would make a lower payment possible. The annual employer pension payment is due on February 1 of each year.

The employer contribution rates for required pension payments to the TRS and ERS continue to be higher than the statutory minimum contribution. To help mitigate the impact of such contributions, various forms of legislation have been enacted from time to time that permitted school districts to amortize a portion of its annual employer pension payments. The District has not amortized any of its employer pension payments pursuant to such legislation and expects to continue to pay all payments in full when due.

The State's 2019-2020 Enacted Budget, which was signed into law as Chapter 59 of the Laws of 2019, includes a provision that will allow school districts in the State to establish a reserve fund for the purpose of funding the cost of TRS contributions, as a sub-fund of retirement contribution reserve funds presently authorized for amounts payable to the ERS by a school district. School districts will be permitted to pay into such reserve fund during any particular fiscal year, an amount not to exceed two percent of the total compensation or salaries of all district-employed teachers who are members of the TRS paid during the immediately preceding fiscal year; provided that the balance of such fund may not exceed ten percent of the total compensation or salaries of all district-employed teachers who are members of the TRS paid during the immediately preceding fiscal year. The District has not established and funded a TRS reserve fund.

The following chart represents the TRS and ERS required contributions for each of the last five completed fiscal years and the budgeted amount for 2027.

Fiscal Year Ending June 30:	TRS	ERS
2022	$780,738	$218,406
2023	824,965	170,842
2024	919,768	176,594
2025	916,522	223,056
2026	1,050,338	282,367
2027 (Budgeted)	935,000	305,000

Source: District Officials.

Other Post-Employment Benefits

The District provides post-retirement healthcare benefits to various categories of former employees. These costs may be expected to rise substantially in the future. School districts and Boards of Cooperative Education Services, unlike other municipal units of government in the State, have been prohibited from reducing retiree health benefits or increasing health care contributions received or paid by retirees below the level of benefits or contributions afforded to or required from active employees. This protection from unilateral reduction of benefits had been extended annually by the New York State Legislature until recently when legislation was enacted to make permanent these health insurance benefit protections for retirees. Legislative attempts to provide similar protection to retirees of other local units of government in the State have not succeeded as of the date hereof. Nevertheless, many such retirees of all varieties of municipal units in the State do presently receive such benefits.

GASB Statement No. 75 ("GASB 75") of the Governmental Accounting Standards Board ("GASB"), requires state and local governments to account for and report their costs associated with post-retirement healthcare benefits and other non-pension benefits ("OPEB"). GASB 75 generally requires that employers account for and report the annual cost of the OPEB and the outstanding obligations and commitments related to OPEB in essentially the same manner as they currently do for pensions. Under previous rules, these benefits have generally been administered on a pay-as-you-go basis and have not been reported as a liability on governmental financial statements. Only current payments to existing retirees were recorded as an expense.

GASB 75 requires that state and local governments adopt the actuarial methodologies to determine annual OPEB costs. Annual OPEB cost for most employers will be based on actuarially determined amounts that, if paid on an ongoing basis, generally would provide sufficient resources to pay benefits as they come due.

During the year ended June 30, 2018, the District adopted GASB 75, which supersedes and eliminates GASB 45. Under GASB 75, based on actuarial valuation, an annual required contribution ("ARC") will be determined for each state or local government. The ARC is the sum of (a) the normal cost for the year (the present value of future benefits being earned by current employees) plus (b) amortization of the unfunded accrued liability (benefits already earned by current and former employees but not yet provided for), using an amortization period of not more than 30 years. If a municipality contributes an amount less than the ARC, a net OPEB obligation will result, which is required to be recorded as a liability on its financial statements.

GASB 75 establishes new standards for recognizing and measuring OPEB liabilities, deferred outflows of resources, deferred inflows of resources, and expense/expenditures to provide more transparent reporting and useful information about the liability and cost of benefits. Municipalities and school districts are required to account for OPEB within the financial statements rather than only noted in the footnotes as previously required by GASB 45. It is measured as of a date no earlier than the end of the employer's prior fiscal year and no later than the employer's current fiscal year. The discount rate is based on 20-year, tax exempt general obligation municipal bonds. There is no amortization of prior service cost.

Those that have more than 200 participants are required to have a full actuarial valuation annually. Plans with fewer than 200 participants are required to have a full valuation every two years.

The District's total OPEB liability at June 30, 2025 is as follows:

	Fiscal Year Ending June 30:
Total OPEB Liability at June 30, 2024	$42,664,191
Charges for the Year:	
Service Cost	1,751,657
Interest	1,835,225
Changes of Benefit Terms	
Differences Between Expected and Actual Experience	332,551
Changes in assumptions or other inputs	(4,005,073)
Benefit Payments	(1,664,767)
Net Changes	(1,750,407)
Total OPEB Liability at June 30, 2025	$40,913,784

The OSC has recently proposed legislation to provide the State and certain local governments with the authority to establish trusts in which to accumulate assets for OPEB and to establish an OPEB investment fund in the sole custody of the State Comptroller for the investment of OPEB assets of the State and participating eligible local governments. The District cannot predict at this time whether such proposed legislation will be enacted into law. At this time, New York State has not developed guidelines for the creation and use of irrevocable trusts for the funding of OPEB. As a result, the District has decided to continue funding the expenditure on a pay-as-you-go basis.

Should the District be required to fund its unfunded actuarial accrued OPEB liability, it could have a material adverse impact upon the District's finances and could force the District to reduce services, raise taxes or both.

TAX INFORMATION

Real Property Taxes

The District derives its power to levy an ad valorem real property tax from the State Constitution; methods and procedures to levy, collect and enforce this tax are governed by the Real Property Tax Law. Real property assessment rolls used by the District are prepared by the Town of Southold. Assessment valuations are determined by the Town assessors and the State Board of Real Property Services which is responsible for certain utility and railroad property. In addition, the State Board of Real Property Services annually establishes State Equalization Rates for all localities in the State, which are determined by statistical sampling of market sales/assessment studies. The equalization rates are used in the calculation and distribution of certain State aids and are used by many localities in the calculation or debt contracting and real property taxing limitations. The District is not subject to constitutional real property taxing limitations; however, see "*The Tax Levy Limit Law*" herein for a discussion of certain statutory limitation that have been imposed.

The following table sets forth the percentage of the District's General Fund revenue (excluding other financing sources) comprised of real property taxes for each of the fiscal years 2021 through 2026, and the amounts budgeted for 2027 fiscal year.

Fiscal Year Ending June 30:	Total Revenue	Real Property Taxes	Real Property Taxes to Revenues (%)
2021	$18,876,532	$15,774,000	83.56
2022	20,272,222	15,677,889	77.34
2023	20,200,635	16,217,614	80.28
2024	23,413,381	17,325,824	74.00
2025	23,622,667	18,023,208	76.30
2026 (Unaudited)	23,477,984	18,598,310	79.22
2027 (Budgeted)	25,995,000	20,343,000	78.26

Source: Audited Financial Statements of the District (2021-2025), Unaudited Financial (2026) and Adopted Budget of the District (2027).
a. Budgeted estimates for total revenues include appropriations of fund balance. Budgeted estimates for real property taxes include STAR.

Tax Collection Procedure

Property taxes for the District, together with County, Town and Fire District taxes, are collected by the Town Tax Receiver. Such taxes are due and payable in equal installments on December 1 and May 10, but may be paid without penalty by January 10 and May 31, respectively. Penalties on unpaid taxes are 1% per month from the date such taxes are due and 10% after May 31.

The Town Tax Receiver distributes the collected tax money to the Town, fire and school districts prior to distributing the balance collected to the County. Uncollected amounts are not segregated by the Receiver and any deficiency in tax collection is the County's liability. The District thereby is assured of full tax collection.

The Tax Levy Limit Law

Chapter 97 of the New York Laws of 2011, as amended, (herein referred to as the "Tax Levy Limit Law" or "Law") modified previous law by imposing a limit on the amount of real property taxes that a school district may levy.

Prior to the enactment of the Law, there was no statutory limitation on the amount of real property taxes that a school district could levy if its budget had been approved by a simple majority of its voters. In the event the budget had been defeated by the voters, the school district was required to adopt a contingency budget. Under a contingency budget, school budget increases were limited to the lesser of four percent (4%) of the prior year's budget or one hundred twenty percent (120%) of the consumer price index ("CPI").

Under the Tax Levy Limit Law, there is now a limitation on the amount of tax levy growth from one fiscal year to the next. Such limitation is the lesser of (i) 2% or (ii) the annual percentage increase in the consumer price index, subject to certain exclusions as mentioned below and as described in the Law. A budget with a tax levy that does not exceed such limit will require approval by at least 50% of the voters. Approval by at least 60% of the voters will be required for a budget with a tax levy in excess of the limit. In the event the voters reject the budget, the tax levy for the school district's budget for the ensuing fiscal year may not exceed the amount of the tax levy for the prior fiscal year. School districts will be permitted to carry forward a certain portion of their unused tax levy limitation from a prior year.

The Law permits certain significant exclusions to the tax levy limit for school districts. These include taxes to pay the local share of debt service on bonds or notes issued to finance voter approved capital expenditures and the refinancing or refunding of such bonds or notes, certain pension cost increases, and other items enumerated in the Law. However, such exclusion does NOT apply to taxes to pay debt service on tax anticipation notes (such as the Notes), revenue anticipation notes, budget notes and deficiency notes; and any obligations issued to finance deficits and certain judgments, including tax certiorari refund payments.

STAR - School Tax Exemption

The STAR (School Tax Relief) program provides State-funded exemptions from school property taxes to homeowners for their primary residences. Homeowners over 65 years of age with household adjusted gross incomes, less the taxable amount of total distributions from individual retirement accounts and individual retirement annuities ("STAR Adjusted Gross Income") of $86,000 or less, increased annually according to a cost of living adjustment, are eligible for a "full value" exemption of the first $66,800 for the 2018-19 school year (adjusted annually). Other homeowners with household STAR Adjusted Gross income not in excess of $500,000 are eligible for a $30,000 "full value" exemption on their primary residence. School districts receive full reimbursement from the State for real property taxes exempted pursuant to the STAR program by the first business day in January of each year.

Part A of Chapter 60 of the Laws of 2016 of the State of New York ("Chapter 60") gradually converts the STAR program from a real property tax exemption to a personal income tax credit. Chapter 60 prohibits new STAR exemptions from being granted unless at least one of the applicants held title to the property on the taxable status date of the assessment roll that was used to levy school district taxes for the 2015-2016 school year (generally, March 1, 2015), and the property was granted a STAR exemption on that assessment roll. However, a new homeowner may receive a new personal income tax credit in the form of a check. The dollar benefit to eligible taxpayers will not change. A taxpayer who is eligible for the new credit will receive a check from the State equal to the amount by which the STAR exemption would have reduced his or her school tax bill. A homeowner who owned his or her home on the taxable status date for the assessment roll used to levy taxes for the 2015-2016 school year, and who received a STAR exemption on that roll, may continue to receive a STAR exemption on that home as long as he or she still owns and primarily resides in it. No further action is required (unless the homeowner has been receiving Basic STAR and wants to apply for Enhanced STAR, which is permissible).

The State 2017-18 Enacted Budget included changes to Chapter 60. STAR checks are now expected to be mailed out prior to the date that school taxes are payable. The amount of the check will be based on the previous year's amount adjusted by the levy growth factor used for the property tax cap. Any changes that must be made based on the final STAR credit compared to the estimate used will be factored into the subsequent year's STAR credit check or taxpayers also may account for those changes in their State income taxes.

The 2019-20 Enacted State Budget makes several changes to the STAR program, which went into effect immediately. The changes are intended to encourage homeowners to switch from the STAR exemption to the STAR credit. The income limit for the exemption has been lowered to $250,000, compared with a $500,000 limit for the Credit. The amount of the STAR exemption will remain the same each year, while the amount of the STAR credit can increase up to two percent annually.

The State's 2020-21 Enacted Budget withholds STAR benefits to taxpayers who are delinquent in the payment of their school taxes and maintains the income limit for the exemption to $250,000, compared with a $500,000 limit for the credit

Approximately 12.0% of the District's 2025-2026 school tax levy was exempted by the STAR program and the District has received full reimbursement of such exempt taxes from the State. Approximately 12% of the District's 2026-2027 school tax levy is expected to be exempt by the STAR program and the District expects to receive full reimbursement of such exempt taxes from the State in January 2027. (See *"State Aid"* herein).

Valuations, Rates and Levies

The following table sets forth District's assessed and full valuations, tax rates and levies for each of the years 2022 through 2026.

Fiscal Year Ending June 30:	Assessed Valuation	State Equal. Rate (%)	Full Valuation	Tax Rate Per $1,000 Assessed Valuation	Tax Levy
2022	$16,018,661	0.7	$2,288,380,143	1,000.83	$16,051,526
2023	16,247,123	0.70	2,321,017,571	1,017.49	16,551,082
2024	15,745,257	0.57	2,762,325,789	1,118.86	17,626,902
2025	15,543,255	0.55	2,826,046,364	1,176.95	18,303,836
2026	15,609,673	0.54	2,890,680,185	1,206.74	18,851,280

Source: Tax Rate Sheets for the Town of Southold.

Selected Listing of Large Taxable Properties in the District
2025-2026 Assessment Roll [a]

Name	Type	Assessed Valuation
Peconic Landing	Senior Community	$1,357,704
LIPA, LILCO, Keyspan	Utility	652,510
Greenport Power LLC	Utility	400,000
Brewer Yacht Yard	Marina	125,000
Levin Family LTD	Motel	98,700
Driftwood Cove	Apartments	90,000
William Claudio	Restaurant	70,245
Riverhead Building Supply	Lumber Company	59,200
Front Street Park LLC	Hotel	51,500
Breezy Shores	Cottage Community	48,000
Townsend Manor	Restaurant	45,100
	Total [b]	$2,997,959

a. Assessment Roll established in 2025 for levy and collection of taxes during 2026 Fiscal Year.
b. Represents 19.20% of the Assessed Valuation of the District for 2025-2026.
Source: Town Assessment Roll.

Tax Certiorari Claims

In common with other school districts, there are a number of tax certiorari proceedings pending involving properties that are subject to the levy of District taxes. The plaintiffs in these matters have asserted that their properties are over-assessed and are seeking assessment reductions. A refund of excess taxes is also generally requested. Historically, certiorari claims have been settled through negotiations, resulting in amounts, at times, substantially less than originally claimed. Many settlements provide for future adjustments with no direct outlay of money. There are no significant claims filed by the larger taxpayers at this time. (See "*Tax Collection Procedure*" herein.)

LITIGATION

In common with other school districts, the District from time to time receives notices of claim and is party to litigation. In the opinion of the District, after consultation with its attorney, unless otherwise set forth herein and apart from matters provided for by applicable insurance coverage, there are no significant claims or actions pending in which the District has not asserted a substantial and adequate defense, nor which, if determined against the District, would have an adverse material effect on the financial condition of the District.

CYBERSECURITY

The District, like many other public and private entities, relies on technology to conduct its operations. As a recipient and provider of personal, private, or sensitive information, the District faces multiple cyber threats including, but not limited to, hacking, viruses, malware and other attacks on computer and other sensitive digital networks and systems. To mitigate the risk of business operations impact and/or damage from cyber incidents or cyber-attacks, the District invests in various forms of cybersecurity and operational controls; however, no assurances can be given that such security and operational control measures will be completely successful to guard against cyber threats and attacks. The results of any such attack could impact business operations and/or damage District digital networks and systems and the costs of remedying any such damage could be substantial.

RISK FACTORS

THE DISTRICT HAS EXPERIENCED A SIGNIFICANT DETERIORATION IN ITS FINANCIAL POSITION IN RECENT YEARS AS A RESULT OF STRUCTURAL OPERATING IMBALANCES THAT HAVE CAUSED A SUBSTANTIAL DRAWDOWN OF THE DISTRICT'S FUND BALANCE AND RESERVES. THE DISTRICT EXPECTS ANOTHER OPERATING DEFICIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026, RESULTING IN A PROJECTED CUMULATIVE UNASSIGNED GENERAL FUND DEFICIT OF APPROXIMATELY $545,000. THE ACTUAL AMOUNT OF SUCH CUMULATIVE DEFICIT IS NOT EXPECTED TO BE KNOWN UNTIL THE AUDIT FOR THE FISCAL YEAR ENDED JUNE 30, 2026 HAS BEEN COMPLETED, WHICH IS EXPECTED TO BE ON OR ABOUT OCTOBER 20, 2026.

THE FOREGOING COULD AFFECT THE MARKETABILITY AND THE MARKET VALUE OF THE NOTES. FOR MORE INFORMATION, SEE ALSO "*DISCUSSION OF RECENT FINANCIAL OPERATING RESULTS AND* PROJECTED *CUMULATIVE DEFICIT*", HEREIN.

There are certain potential risks associated with an investment in the Notes, and investors should be thoroughly familiar with this Official Statement, including its appendices, to make an informed investment decision. Investors should consider, in particular, the following factors:

Federal Policy Risk. Federal polices on trade, immigration, and other topics can shift dramatically from one administration to another. From time to time, such shifts can result in reductions to the State's level of federal funding for a variety of social services, health care, public safety, transportation, public health, and other federally funded programs. There can be no prediction of future changes in federal policy or the potential impact on any related federal funding that the State may or may not receive in the future. In addition, reductions in federally funded programs could increase operating and service demands at the local level, potentially resulting in greater financial pressure on school district budgets and taxpayers. The extent and timing of any such impact cannot be predicted.

The District's credit rating could be affected by circumstances beyond the District's control. Economic conditions such as the rate of unemployment and inflation, termination of commercial operations by corporate taxpayers and employers, as well as natural catastrophes, could adversely affect the assessed valuation of District property and its ability to maintain fund balances and other statistical indices commensurate with its current credit rating. As a consequence, a decline in the District's credit rating could adversely affect the market value of the Notes.

If and when an owner of any of the Notes should elect to sell a Note prior to its maturity, there can be no assurance that a market will have been established, maintained and continue in existence for the purchase and sale of any of those Notes. The market value of the Notes is dependent upon the ability of holder to potentially incur a capital loss if such Note is sold prior to its maturity.

There can be no assurance that adverse events including, for example, the seeking by another municipality in the State or elsewhere of remedies pursuant to the Federal Bankruptcy Act or otherwise, will not occur which might affect the market price of and the market for the Notes. In particular, if a significant default or other financial crisis should occur in the affairs of the State or any of its municipalities, public authorities or other political subdivisions thereby possibly further impairing the acceptability of obligations issued by those entities, both the ability of the District to arrange for additional borrowing(s) as well as the market for and market value of outstanding debt obligations, including the Notes, could be adversely affected.

Future amendments to applicable statutes whether enacted by the State or the United States of America affecting the treatment of interest paid on municipal obligations, including the Notes, for income taxation purposes could have an adverse effect on the market value of the Notes (see "*TAX MATTERS*" herein).

The enactment of the Tax Levy Limit Law, which imposes a tax levy limitation upon municipalities, school districts and fire districts in the State, including the District, without providing exclusion for debt service on obligations issued by municipalities and fire districts, including the District, may affect the market price and/or marketability for the Notes. (See "*The Tax Levy Limit Law*" herein.)

Federal or State legislation imposing new or increased mandatory expenditures by municipalities, school districts and fire districts in the State, including the District could impair the financial condition of such entities, including the District and the ability of such entities, including the District, to pay debt service on their respective obligations.

An outbreak of disease or similar public health threat, such as the COVID-19 outbreak, or fear of such an event, could have an adverse impact on the District's financial condition and operating results by potentially delaying the receipt of real property taxes or resulting in a delay or reduction by the State in the payment of State aid.

The District relies in part on State aid to fund its operations. There can be no assurance that the State appropriation for State aid to school districts will be continued in future years, either pursuant to existing formulas or in any form whatsoever. The availability of such monies and the timeliness of such payment may also be affected by a delay in the adoption of the State budget, the State's economy and financial condition, including State fiscal stress, or other circumstances. In any event, State aid appropriated and apportioned to the District can be paid only if the State has such monies available therefore. (See "*State Aid*" and "*State Aid History*" herein).

TAX MATTERS

Opinion of Bond Counsel

In the opinion of Hawkins Delafield & Wood LLP, Bond Counsel to the District, under existing statutes and court decisions and assuming continuing compliance with certain tax certifications described herein, (i) interest on the Notes is excluded from gross income for federal income tax purposes pursuant to Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and (ii) interest on the Notes is not treated as a preference item in calculating the alternative minimum tax under the Code, however, interest on the Notes is included in the "adjusted financial statement income" of certain corporations that are subject to the alternative minimum tax under Section 55 of the Code. The Tax Certificate of the District (the "Tax Certificate"), which will be delivered concurrently with the delivery of the Notes, will contain provisions and procedures relating to compliance with applicable requirements of the Code. In rendering its opinion, Bond Counsel has relied on certain representations, certifications of fact, and statements of reasonable expectations made by the District in connection with the Notes, and Bond Counsel has assumed compliance by the District with certain ongoing provisions and procedures set forth in the Tax Certificate relating to compliance with applicable requirements of the Code to assure the exclusion of interest on the Notes from gross income under Section 103 of the Code.

In addition, in the opinion of Bond Counsel to the District, under existing statutes, interest on the Notes is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York.

Bond Counsel expresses no opinion as to any other federal, state or local tax consequences arising with respect to the Notes, or the ownership or disposition thereof, except as stated above. Bond Counsel renders its opinion under existing statutes and court decisions as of the issue date, and assumes no obligation to update, revise or supplement its opinion to reflect any action thereafter taken or not taken, any fact or circumstance that may thereafter come to its attention, any change in law or interpretation thereof that may thereafter occur, or for any other reason. Bond Counsel expresses no opinion as to the consequence of any of the events described in the preceding sentence or the likelihood of their occurrence. In addition, Bond Counsel expresses no opinion on the effect of any action taken or not taken in reliance upon an opinion of other counsel regarding federal, state or local tax matters, including, without limitation, exclusion from gross income for federal income tax purposes of interest on the Notes.

Certain Ongoing Federal Tax Requirements and Certifications

The Code establishes certain ongoing requirements that must be met subsequent to the issuance and delivery of the Notes in order that interest on the Notes be and remain excluded from gross income under Section 103 of the Code. These requirements include, but are not limited to, requirements relating to use and expenditure of gross proceeds of the Notes, yield and other restrictions on investments of gross proceeds, and the arbitrage rebate requirement that certain excess earnings on gross proceeds be rebated to the federal government. Noncompliance with such requirements may cause interest on the Notes to become included in gross income for federal income tax purposes retroactive to their issue date, irrespective of the date on which such noncompliance occurs or is discovered. The District, in executing the Tax Certificate, will certify to the effect that the District will comply with the provisions and procedures set forth therein and that it will do and perform all acts and things necessary or desirable to assure the exclusion of interest on the Notes from gross income under Section 103 of the Code.

Certain Collateral Federal Tax Consequences

The following is a brief discussion of certain collateral federal income tax matters with respect to the Notes. It does not purport to address all aspects of federal taxation that may be relevant to a particular owner of a Note. Prospective investors, particularly those who may be subject to special rules, are advised to consult their own tax advisors regarding the federal tax consequences of owning and disposing of the Notes.

Prospective owners of the Notes should be aware that the ownership of such obligations may result in collateral federal income tax consequences to various categories of persons, such as corporations (including S corporations and foreign corporations), financial institutions, property and casualty and life insurance companies, individual recipients of Social Security and railroad retirement benefits, individuals otherwise eligible for the earned income tax credit, and taxpayers deemed to have incurred or continued indebtedness to purchase or carry obligations the interest on which is excluded from gross income for federal income tax purposes. Interest on the Notes may be taken into account in determining the tax liability of foreign corporations subject to the branch profits tax imposed by Section 884 of the Code.

Original Issue Discount

"Original issue discount" ("OID") is the excess of the sum of all amounts payable at the stated maturity of a Note (excluding certain "qualified stated interest" that is unconditionally payable at least annually at prescribed rates) over the issue price of that maturity. In general, the "issue price" of a maturity (a note with the same maturity date, interest rate, and credit terms) means the first price at which at least 10 percent of such maturity was sold to the public, i.e., a purchaser who is not, directly or indirectly, a signatory to a written contract to participate in the initial sale of the Notes. In general, the issue price for each maturity of the Notes is expected to be the initial public offering price set forth in this Official Statement. Bond Counsel further is of the opinion that, for any Notes having OID (a "Discount Note"), OID that has accrued and is properly allocable to the owners of the Discount Notes under Section 1288 of the Code is excludable from gross income for federal income tax purposes to the same extent as other interest on the Notes.

In general, under Section 1288 of the Code, OID on a Discount Note accrues under a constant yield method, based on periodic compounding of interest over prescribed accrual periods using a compounding rate determined by reference to the yield on that Discount Note. An owner's adjusted basis in a Discount Note is increased by accrued OID for purposes of determining gain or loss on sale, exchange, or other disposition of such Discount Note. Accrued OID may be taken into account as an increase in the amount of tax-exempt income received or deemed to have been received for purposes of determining various other tax consequences of owning a Discount Note even though there will not be a corresponding cash payment.

Owners of Discount Notes should consult their own tax advisors with respect to the treatment of original issue discount for federal income tax purposes, including various special rules relating thereto, and the state and local tax consequences of acquiring, holding, and disposing of Discount Notes.

Note Premium

In general, if an owner acquires a Note for a purchase price (excluding accrued interest) or otherwise at a tax basis that reflects a premium over the sum of all amounts payable on the Note after the acquisition date (excluding certain "qualified stated interest" that is unconditionally payable at least annually at prescribed rates), that premium constitutes "note premium" on that Note (a "Premium Note"). In general, under Section 171 of the Code, an owner of a Premium Note must amortize the note premium over the remaining term of the Premium Note, based on the owner's yield over the remaining term of the Premium Note determined based on constant yield principles (in certain cases involving a Premium Note callable prior to its stated maturity date, the amortization period and yield may be required to be determined on the basis of an earlier call date that results in the lowest yield on such note). An owner of a Premium Note must amortize the note premium by offsetting the qualified stated interest allocable to each interest accrual period under the owner's regular method of accounting against the note premium allocable to that period. In the case of a tax-exempt Premium Note, if the note premium allocable to an accrual period exceeds the qualified stated interest allocable to that accrual period, the excess is a nondeductible loss. Under certain circumstances, the owner of a Premium Note may realize a taxable gain upon disposition of the Premium Note even though it is sold or redeemed for an amount less than or equal to the owner's original acquisition cost. Owners of any Premium Notes should consult their own tax advisors regarding the treatment of note premium for federal income tax purposes, including various special rules relating thereto, and state and local tax consequences, in connection with the acquisition, ownership, amortization of note premium on, sale, exchange, or other disposition of Premium Notes.

Information Reporting and Backup Withholding

Information reporting requirements apply to interest paid on tax-exempt obligations, including the Notes. In general, such requirements are satisfied if the interest recipient completes and provides the payor with, a Form W-9, "Request for Taxpayer Identification Number and Certification," or if the recipient is one of a limited class of exempt recipients. A recipient not otherwise exempt from information reporting who fails to satisfy the information reporting requirements will be subject to "backup withholding," which means that the payor is required to deduct and withhold a tax from the interest payment, calculated in the manner set forth in the Code. For the foregoing purpose, a "payor" generally refers to the person or entity from whom a recipient receives its payments of interest or who collects such payments on behalf of the recipient.

If an owner purchasing a Note through a brokerage account has executed a Form W-9 in connection with the establishment of such account, as generally can be expected, no backup withholding should occur. In any event, backup withholding does not affect the excludability of the interest on the Notes from gross income for federal income tax purposes. Any amounts withheld pursuant to backup withholding would be allowed as a refund or a credit against the owner's federal income tax once the required information is furnished to the Internal Revenue Service.

Miscellaneous

Tax legislation, administrative actions taken by tax authorities, or court decisions, whether at the federal or state level, could adversely affect the tax-exempt status of interest on the Notes under federal or state law or otherwise prevent beneficial owners of the Notes from realizing the full current benefit of the tax status of such interest. In addition, such legislation or actions (whether currently proposed, proposed in the future, or enacted) or such decisions could affect the market price or marketability of the Notes.

Prospective purchasers of the Notes should consult their own tax advisors regarding the foregoing matters.

LEGAL MATTERS

Legal matters incident to the authorization, issuance and sale of the Notes will be subject to the final approving opinion of Hawkins Delafield & Wood LLP, Bond Counsel, substantially as set forth in Appendix D hereto.

DISCLOSURE UNDERTAKING

In order to assist the purchasers of the Notes in complying with Rule 15c2-12 promulgated by the Securities and Exchange Commission under the Securities Exchange Act of 1934, as amended ("Rule 15c2-12"), the District will execute an "Undertaking to Provide Notices of Events", substantially in the form of which is attached hereto as Appendix E.

RATING

The Notes are not rated. Subject to the approval of the District, the purchaser(s) of the Notes may have a rating completed after the sale at the expense of the purchaser(s), including any fees to be incurred by the District, such as a rating action that may require the filing of a material event notification to EMMA and/or the provision of a supplement to the Final Official Statement.

Moody's Investors Service ("Moody's") has assigned a rating of "A1" to the outstanding bonds of the District. This rating will reflect only the view of such rating agency and an explanation of the significance of such rating should be obtained from Moody's, 7 WTC at Greenwich Street, New York, NY, Phone: (212) 553-4055 and Fax: (212) 298-6761. Generally, a rating agency bases its ratings on the information and materials furnished to it and on investigation, studies and assumptions by the rating agency. There is no assurance that a particular rating will apply for any given period of time or that it will not be lowered or withdrawn entirely if, in the judgment of the agency originally establishing the rating, circumstances so warrant. Any downward revision or withdrawal of such ratings could have an adverse effect on the market price of the bonds or the availability of a secondary market for such bonds.

MUNICIPAL ADVISOR

Munistat Services, Inc. (the "Municipal Advisor"), is a Municipal Advisor, registered with the Securities and Exchange Commission and the Municipal Securities Rulemaking Board. The Municipal Advisor serves as independent financial advisor to the District on matters relating to debt management. The Municipal Advisor is a financial advisory and consulting organization and is not engaged in the business of underwriting, marketing, or trading municipal securities or any other negotiated instruments. The Municipal Advisor has not audited, authenticated, or otherwise verified the information provided by the District or the information set forth in this Official Statement or any other information available to the District with respect to the appropriateness, accuracy, or completeness of disclosure of such information and no guarantee, warranty, or other representation is made by the Municipal Advisor respecting the accuracy and completeness of or any other matter related to such information and this Official Statement.

ADDITIONAL INFORMATION

Additional information may be obtained upon request from the business office of the District: Charles Scheid, Assistant Superintendent for Business, Greenport Union Free School District, 720 Front Street, Greenport, NY 11944, Phone (631) 477-1950, Fax (631) 593-8950 and email: cscheid@gufsd.org or from the office of Munistat Services, Inc., 12 Roosevelt Avenue, Port Jefferson Station, New York 11776, telephone number (631) 331-8888, and website: www.munistat.com

Statements in the Official Statement, and the documents included by specific reference, that are not historical facts are "forward-looking statements", within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended, and as defined in the Private Securities Litigation Reform Act of 1995, which involve a number of risks and uncertainties, and which are based on the District's management's beliefs as well as assumptions made by, and information currently available to, the District's management and staff. Because the statements are based on expectations about future events and economic performance and are not statements of fact, actual results may differ materially from those projected. Important factors that could cause future results to differ include legislative and regulatory changes, changes in the economy, and other factors discussed in this and other documents that the District's files with the repositories. When used in District's documents or oral presentation, the words "anticipate", "believe", "intend", "plan", "foresee", "likely", "estimate", "expect", "objective", "projection", "forecast", "goal", "will", or "should", or similar words or phrases are intended to identify forward-looking statements.

To the extent any statements made in this Official Statement involve matters of opinion or estimates whether or not expressly stated, they are set forth as such and not as representations of fact, and no representation is made that any of the statements will be realized. Neither this Official Statement nor any statement which may have been made verbally or in writing is to be construed as a contract with the holder of the Notes.

Munistat Services, Inc. may place a copy of this Official Statement on its website at www.munistat.com. Unless this Official Statement specifically indicates otherwise, no statement on such website is included by specific reference or constitutes a part of this Official Statement. Munistat Services, Inc. has prepared such website information for convenience, but no decisions should be made in reliance upon that information. Typographical or other errors may have occurred in converting original source documents to digital format, and neither the District nor Munistat Services, Inc. assumes any liability or responsibility for errors or omissions on such website. Further, Munistat Services, Inc. and the District disclaim any duty or obligation either to update or to maintain that information or any responsibility or liability for any damages caused by viruses in the electronic files on the website. Munistat Services, Inc. and the District also assume no liability or responsibility for any errors or omissions or unauthorized editing or for any updates to dated website information.

Any statements in this Official Statement involving matters of opinion or estimates, whether or not expressly stated, are intended as such and not as representations of fact. No representation is made that any of such statements will be, in fact, realized. This Official Statement is not to be construed as a contract or agreement between the District and the original purchasers or owners of any of the Notes.

By: s/s JAIME MARTILOTTA
President of the Board of Education
Greenport Union Free School District
Greenport, New York

October , 2026

APPENDIX A

FINANCIAL INFORMATION

Balance Sheet
General Fund

	Fiscal Year Ended June 30:		
	2024	2025	2026
Assets:			(Unaudited)
Cash - Unrestricted	$ 2,464,070	$ 1,652,240	$ 2,118,166
Cash - Restricted	7,580,174	6,307,087	4,126,035
Accounts Receivable	345	300	19,647
State and Federal Aid	93,003	102,846	110,900
Due From Other Governments	949,294	877,043	1,174,203
Taxes Receivable	530,086	386,200	255,619
Due from Other Funds	642,575	809,210	1,079,330
Prepaid Expenditures	404,485	439,979	
Total Assets	$ 12,664,032	$ 10,574,905	$ 8,883,900
Liabilities:			
Accounts Payable	$ 148,267	$ 93,132	$ 459,163
Accrued Liabilities	44,630	9,509	25,140
Due to Other Governments	308,562	231,004	919,256
Due to Other Funds	1,435,852	449,889	2,525,691
Other Liabilities	68,832	87,908	97,857
Due to Teachers' Retirement System	916,522	1,050,338	1,045,247
Due to Employees' Retirement System	70,757	104,989	102,856
Compensated Absences Payable	83,795	102,731	13,917
Collections in Advance	5,000		13,918
Total Liabilities	3,082,217	2,129,500	5,203,045
Deferred Inflows of Resources:			
PILOTS collected in advance			98,657
Total Deferred Inflows of Resources	0	0	98,657
Fund Balances:			
Nonspendable	404,485	439,979	
Restricted	7,580,174	6,307,087	4,126,035
Assigned	582,156	1,605,342	0
Unassigned	1,015,000	92,997	(543,837)
Total Fund Balances	9,581,815	8,445,405	3,582,198
Total Liabilities, Deferred Inflows of Resources, and Fund Balances	$ 12,664,032	$ 10,574,905	$ 8,883,900

Source: Audited Financial Statements (2024-2025), Unaudited Financials (2026)
NOTE: This schedule is NOT audited.

Statement of Revenues, Expenditures and Fund Balance
General Fund

	Fiscal Year Ending June 30:				
	2022	2023	2024	2025	2026
Revenues:					(Unaudited)
Real Property Taxes	$ 15,677,889	$ 16,217,614	$ 17,325,824	$ 18,023,208	$ 18,598,310
Other Real Property Tax Items	460,921	490,271	522,718	446,453	324,618
Charges for Services	2,098,174	1,000,373	1,502,125	1,489,894	1,039,223
Use of Money and Property	4,528	110,075	523,328	329,462	183,470
Sale of Property & Compensation for Loss			3,083	8,090	
Miscellaneous	101,420	100,017	343,783	169,654	38,014
interfund Revenues				695	
State Sources	1,902,522	2,253,957	3,124,869	3,121,685	3,258,128
Federal Sources	26,768	28,328	67,651	33,526	36,221
Total Revenues	$ 20,272,222	$ 20,200,635	$ 23,413,381	$ 23,622,667	$ 23,477,984
Expenditures:					
General Support	$ 2,390,927	$ 2,617,803	$ 3,033,575	$ 3,010,970	$ 3,569,728
Instruction	9,223,379	9,513,095	10,099,254	11,731,499	12,636,325
Pupil Transportation	625,214	638,396	842,831	1,173,685	1,289,186
Employee Benefits	5,203,252	5,538,899	5,850,682	7,245,474	7,176,620
Debt Service	793,836	1,116,961	1,548,422	1,747,787	1,670,469
Total Expenditures	$ 18,236,608	$ 19,425,154	$ 21,374,764	$ 24,909,415	$ 26,342,328
Other Sources and Uses:					
Premiums on Obligations		31,898	82,585	165,627	14,285
Operating Transfers In	(215,053)				
Operating Transfers (Out)	83,800	(21,628)	(521,259)	(15,289)	(2,013,148)
Total Other Sources and (Uses)	(131,253)	10,270	(438,674)	150,338	(1,998,863)
Excess (Deficiency) of Revenues & Other Sources over Expenditures & Other (Uses)	1,904,361	785,751	1,599,943	(1,136,410)	(4,863,207)
Adjustments					
Fund Balance Beginning of Year	5,291,760	7,196,121	7,981,872	9,581,815	8,445,405
Fund Balance End of Year	$ 7,196,121	$ 7,981,872	$ 9,581,815	$ 8,445,405	$ 3,582,198

Source: Audited Financial Statements (2022-2025), Unaudited Financials (2026)
NOTE: This schedule is NOT audited.

BUDGET SUMMARIES

	Fiscal Year Ending June 30:	
	2025-2026 [b]	2026-2027 [a]
Revenues:		
Real Property Taxes	$ 18,851,280	$ 20,343,000
Local Revenues	4,179,789	1,749,228
State Aid	3,487,989	3,624,415
Appropriation of Fund Balance and Reserves	440,000	278,357
Total Revenues	$ 26,959,058	$ 25,995,000
Expenditures:		
General Support	$ 3,446,747	$ 3,110,266
Instruction	12,573,729	11,838,116
Pupil Transportation	1,196,412	1,277,017
Employee Benefits	7,782,997	7,604,551
Debt Service & Transfers	1,959,173	2,165,050
Total Expenditures	$ 26,959,058	$ 25,995,000

a. Aproved by the voters of the District on May 19, 2026.

b. Aproved by the voters of the District on May 20, 2025.

Source: Adopted Budgets of the District

APPENDIX B

CASH FLOWS

GREENPORT UNION FREE SCHOOL DISTRICT
CASH FLOW SUMMARY 2025-2026
Actual

	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
Balance - Beginning of Month	7,959,327	8,222,390	6,788,554	4,892,306	3,415,934	4,479,143	3,099,584	9,090,248	7,934,645	7,403,797	6,048,356	2,395,804	7,959,327
Receipts													
Real Property Taxes/STAR				386,222			8,064,998	662,770	456,895	228,448	1,167,193	8,542,033	19,508,557
STAR Reimbursement							252,970						252,970
Tuition/Shared Servs	598,354		33,344										631,698
State/ Federal Aid	104,999	77,611	34,119	13,324	341,155	306,349	203,223	110,605	1,153,070	7,919	9,308	158,602	2,520,284
Interest Income	19,677	20,610	16,247	8,943	5,646	5,575	5,331	14,604	17,385	16,787	8,865	10,774	150,444
Other Receipts	31,001	6,559	17,610	128,139	49,916	29,810	8,418	116,140	415,028	28,248	128,501	35,815	995,185
Spec Aid/School Lunch Receipts	44,242	178,435	27,022	210,723	34,016	46,801	30,742	34,229	22,973	38,257	26,945	30,103	724,488
TAN Proceeds					3,509,765								3,509,765
Total Receipts	798,273	283,215	128,341	747,350	3,940,498	388,535	8,565,682	938,347	2,065,351	319,658	1,340,812	8,777,328	28,293,391
Disbursements													
Salary and Benefits	305,514	292,062	989,512	992,163	1,087,420	1,504,187	1,049,565	1,001,535	950,719	810,126	935,296	2,574,609	12,492,707
Health Insurance		889,083	413,055	495,692	435,678		878,621		834,237	431,153		429,817	4,807,335
Operating Expense	229,696	535,906	533,760	735,868	838,172	263,907	327,730	592,415	725,987	390,975	441,219	577,366	6,193,000
Library Taxes							307,914						307,914
Debt Service					516,019								516,019
Transfer to Other Funds/Reserves			88,263				11,187	500,000	85,257	42,845		153,146	880,699
TAN Repayment											3,561,250		3,561,250
TAN Interest											55,600	1,194,980	1,250,580
Total Disbursements	535,211	1,717,051	2,024,589	2,223,723	2,877,289	1,768,094	2,575,018	2,093,950	2,596,200	1,675,099	4,993,365	4,929,918	30,009,505
Balance	8,222,390	6,788,554	4,892,306	3,415,934	4,479,143	3,099,584	9,090,248	7,934,645	7,403,797	6,048,356	2,395,804	6,243,213	6,243,213
Note Payment Account													
Opening Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
Receipts	0	0	0	0	0	0	0	0	0	0	3,500,000	0	3,500,000
Disbursements	0	0	0	0	0	0	0	0	0	0	3,500,000	0	3,500,000
Closing Balance	0	0	0	0	0	0	0	0	0	0	0	0	0

* Balance as of June 30, 2025 includes approximately $6.3 million in restricted reserves.
Note: October Tax receipts are amounts owed from the previous year.

GREENPORT UNION FREE SCHOOL DISTRICT
CASH FLOW SUMMARY 2026-2027
Projected

	(Actual) Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
Balance - Beginning of Month	6,243,213	5,479,478	4,474,478	2,478,478	5,941,478	3,443,878	1,236,035	7,945,289	6,801,289	6,606,289	5,142,289	4,666,964	6,243,213
Receipts													
Real Property Taxes/STAR	113,601			395,000			8,702,000	715,000	492,000	245,000	1,250,000	9,210,000	21,122,601
STAR Reimbursement							260,000						260,000
Tuition/Shared Servs			35,000										35,000
State/ Federal Aid	27,729	78,000	35,000	20,000	355,000	315,000	210,000	125,000	1,180,000	10,000	15,000	170,000	2,540,729
Interest Income	15,693	15,000	14,000	13,000	6,000	5,000	5,000	13,000	16,000	16,000	9,000	10,000	137,693
Other Receipts	139,563	7,000	15,000	110,000	42,000	28,000	10,000	110,000	410,000	30,000	130,000	37,000	1,068,563
Spec Aid/School Lunch Receipts	6,080	179,000	30,000	225,000	35,000	50,000	32,000	40,000	24,000	40,000	30,000	31,000	722,080
TAN Proceeds				5,000,000									5,000,000
Total Receipts	302,667	279,000	129,000	5,763,000	438,000	398,000	9,219,000	1,003,000	2,122,000	341,000	1,434,000	9,458,000	30,886,667
Disbursements													
Salary and Benefits	250,668	294,000	1,050,000	1,050,000	1,100,000	1,540,000	1,075,000	1,075,000	1,050,000	940,000	975,000	2,700,000	13,099,668
Health Insurance	460,437	450,000	440,000	500,000	450,000	452,000	452,000	452,000	450,000	445,000	445,000	445,000	5,441,437
Operating Expense	355,298	540,000	545,000	750,000	860,000	275,000	650,000	600,000	730,000	380,000	445,000	585,000	6,715,298
Library Taxes							319,746					319,746	639,492
Debt Service					525,600	338,843					44,325	1,072,650	1,981,418
Transfer to Other Funds/Reserves			90,000				13,000	20,000	87,000	40,000		150,000	400,000
TAN Repayment												5,000,000	5,000,000
TAN Interest												135,000	135,000
Total Disbursements	1,066,402	1,284,000	2,125,000	2,300,000	2,935,600	2,605,843	2,509,746	2,147,000	2,317,000	1,805,000	1,909,325	10,407,396	33,412,312
Balance	5,479,478	4,474,478	2,478,478	5,941,478	3,443,878	1,236,035	7,945,289	6,801,289	6,606,289	5,142,289	4,666,964	3,717,568	3,717,568
Note Payment Account													
Opening Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
Receipts	0	0	0	0	0	0	0	0	0	0	0	5,000,000	5,000,000
Disbursements	0	0	0	0	0	0	0	0	0	0	0	5,000,000	5,000,000
Closing Balance	0	0	0	0	0	0	0	0	0	0	0	0	0

* The Beginning Balance as of June 30, 2026 is all Restricted Cash.
Note: July & October Tax receipts are amounts owed from the previous year.

GREENPORT UNION FREE SCHOOL DISTRICT

APPENDIX C

AUDITED FINANCIAL STATEMENTS
FOR THE FISCAL YEAR ENDED JUNE 30, 2025

►Click Here For 2025 Audit

NOTE: SUCH FINANCIAL REPORT AND OPINIONS WERE PREPARED AS OF THE DATE THEREOF AND HAVE NOT BEEN REVIEWED AND/OR UPDATED IN CONNECTION WITH THE PREPARATION AND DISSEMINATION OF THIS OFFICIAL STATEMENT. CONSENT OF THE AUDITORS HAS NOT BEEN REQUESTED OR OBTAINED.

APPENDIX D

FORM OF APPROVING LEGAL OPINION OF BOND COUNSEL

FORM OF OPINION OF BOND COUNSEL

Hawkins Delafield & Wood LLP
140 Broadway, 42nd Floor
New York, New York 10005

October , 2026

The Board of Education of
Greenport Union Free School District,
in the County of Suffolk, New York

Ladies and Gentlemen:

We have acted as Bond Counsel to Greenport Union Free School District (the "School District"), in the County of Suffolk, a school district of the State of New York, and have examined a record of proceedings relating to the authorization, sale and issuance of the $5,000,000 Tax Anticipation Notes for 2026-2027 Taxes (the "Note"), dated and delivered the date hereof.

In such examination, we have assumed the genuineness of all signatures, the authenticity of all documents submitted to us as originals and the conformity with originals of all documents submitted to us as copies thereof.

Based upon and subject to the foregoing, and in reliance thereon, as of the date hereof, we are of the following opinions:

1. The Note is a valid and legally binding general obligation of the School District for which the School District has validly pledged its faith and credit and, unless paid from other sources, all the taxable real property within the School District is subject to the levy of ad valorem real estate taxes to pay the Note and interest thereon, subject to certain statutory limitations. The enforceability of rights or remedies with respect to such Note may be limited by bankruptcy, insolvency, or other laws affecting creditors' rights or remedies heretofore or hereafter enacted.

2. Under existing statutes and court decisions and assuming continuing compliance with certain tax certifications described herein, (i) interest on the Note is excluded from gross income for federal income tax purposes pursuant to Section 103 of the Internal Revenue Code of 1986, as amended (the "Code"), and (ii) interest on the Note is not treated as a preference item in calculating the alternative minimum tax under the Code; however, interest on the Note is included in the "adjusted financial statement income" of certain corporations that are subject to the alternative minimum tax under Section 55 of the Code.

The Code establishes certain requirements that must be met subsequent to the issuance of the Note in order that the interest on the Note be and remain excludable from gross income for federal income tax purposes under Section 103 of the Code. These requirements

include, but are not limited to, requirements relating to the use and expenditure of proceeds of the Note, restrictions on the investment of proceeds of the Note prior to expenditure and the requirement that certain earnings be rebated to the federal government. Noncompliance with such requirements may cause the interest on the Note to become subject to federal income taxation retroactive to the date of issuance thereof, irrespective of the date on which such noncompliance occurs or is ascertained.

On the date of issuance of the Note, the School District will execute a Tax Certificate relating to the Note containing provisions and procedures pursuant to which such requirements can be satisfied. In executing the Tax Certificate, the School District represents that it will comply with the provisions and procedures set forth therein and that it will do and perform all acts and things necessary or desirable to assure that the interest on the Note will, for federal income tax purposes, be excluded from gross income.

In rendering the opinion in this paragraph 2, we have relied upon and assumed (i) the material accuracy of the School District's representations, statements of intention and reasonable expectations, and certifications of fact contained in the Tax Certificate with respect to matters affecting the status of the interest on the Note, and (ii) compliance by the School District with the procedures and representations set forth in the Tax Certificate as to such tax matters.

3. Under existing statutes, interest on the Note is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York.

We express no opinion as to any other federal, state or local tax consequences arising with respect to the Note, or the ownership or disposition thereof, except as stated in paragraphs 2 and 3 above. We render our opinion under existing statutes and court decisions as of the date hereof, and assume no obligation to update, revise or supplement our opinion to reflect any action hereafter taken or not taken, any fact or circumstance that may hereafter come to our attention, any change in law or interpretation thereof that may hereafter occur, or for any other reason. We express no opinion as to the consequence of any of the events described in the preceding sentence or the likelihood of their occurrence. In addition, we express no opinion on the effect of any action taken or not taken in reliance upon an opinion of other counsel regarding federal, state or local tax matters, including, without limitation, exclusion from gross income for federal income tax purposes of interest on the Note.

We give no assurances as to the adequacy, sufficiency or completeness of the Preliminary Official Statement and/or Official Statement relating to the Note or any proceedings, reports, correspondence, financial statements or other documents, containing financial or other information relative to the School District, which have been or may hereafter be furnished or disclosed to purchasers of ownership interests in the Note.

Very truly yours,

APPENDIX E

FORM OF EVENTS NOTICE UNDERTAKING

UNDERTAKING TO PROVIDE NOTICES OF EVENTS

Section 1. Definitions

"EMMA" shall mean Electronic Municipal Market Access System implemented by the MSRB.

"Financial Obligation" shall mean "financial obligation" as such term is defined in the Rule.

"GAAP" shall mean generally accepted accounting principles as in effect from time to time in the United States.

"Holder" shall mean any registered owner of the Securities and any beneficial owner of Securities within the meaning of Rule 13d-3 under the Securities Exchange Act of 1934.

"Issuer" shall mean the Greenport Union Free School District, in the County of Suffolk, a school district of the State of New York.

"MSRB" shall mean the Municipal Securities Rulemaking Board established in accordance with the provisions of Section 15B(b)(1) of the Securities Exchange Act of 1934.

"Purchaser" shall mean the financial institution referred to in the Certificate of Determination, executed by the President of the Board of Education as of October 22, 2026.

"Rule 15c2-12" shall mean Rule 15c2-12 under the Securities Exchange Act of 1934, as amended through the date of this Undertaking, including any official interpretations thereof.

"Securities" shall mean the Issuer's $5,000,000 Tax Anticipation Notes for 2026-2027 Taxes, dated October 22, 2026, maturing on June 24, 2027, and delivered on the date hereof.

Section 2. Obligation to Provide Notices of Events. (a) The Issuer hereby undertakes, for the benefit of Holders of the Securities, to provide or cause to be provided either directly or through to the Electronic Municipal Market Access ("EMMA") System implemented by the Municipal Securities Rulemaking Board established pursuant to Section 15B(b)(1) of the Securities Exchange Act of 1934, or any successor thereto or to the functions of such Board contemplated by the Undertaking, in a timely manner, not in excess of ten (10) business days after the occurrence of any such event, notice of any of the following events with respect to the Securities:

(1) principal and interest payment delinquencies;

(2) non-payment related defaults, if material;

(3) unscheduled draws on debt service reserves reflecting financial difficulties;

(4) unscheduled draws on credit enhancements reflecting financial difficulties;

(5) substitution of credit or liquidity providers, or their failure to perform;

(6) adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices of determinations with respect to the tax status of the Securities, or other material events affecting the tax status of the Securities;

(7) modifications to rights of Securities holders, if material;

(8) Bond calls, if material, and tender offers;

(9) defeasances;

(10) release, substitution, or sale of property securing repayment of the Securities, if material;

(11) rating changes;

(12) bankruptcy, insolvency, receivership or similar event of the Issuer;

Note to clause (12): For the purposes of the event identified in clause (12) above, the event is considered to occur when any of the following occur: the appointment of a receiver, fiscal agent or similar officer for the Issuer in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or government authority has assumed jurisdiction over substantially all of the assets or business of the Issuer, or if such jurisdiction has been assumed by leaving the existing governing body and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the Issuer;

(13) the consummation of a merger, consolidation, or acquisition involving the Issuer or the sale of all or substantially all of the assets of the Issuer, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material;

(14) appointment of a successor or additional trustee or the change of name of a trustee, if material;

(15) incurrence of a Financial Obligation of the Issuer, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation of the Issuer, any of which affect security holders, if material; and

(16) default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the Issuer, any of which reflect financial difficulties.

(b) Nothing herein shall be deemed to prevent the Issuer from disseminating any other information in addition to that required hereby in the manner set forth herein or in any other manner. If the Issuer disseminates any such additional information, the Issuer shall have no obligation to update such information or include it in any future materials disseminated hereunder.

(c) Nothing herein shall be deemed to prevent the Issuer from providing notice of the occurrence of certain other events, in addition to those listed above, if the Issuer determines that any such other event is material with respect to the Securities; but the Issuer does not undertake to commit to provide any such notice of the occurrence of any event except those events listed above.

Section 3. Remedies. If the Issuer shall fail to comply with any provision of this Undertaking, then any Holder of Securities may enforce, for the equal benefit and protection of all Holders similarly situated, by mandamus or other suit or proceeding at law or in equity, this Undertaking against the Issuer and any of the officers, agents and employees of the Issuer, and may compel the Issuer or any such officers, agents or employees to perform and carry out their duties under this Undertaking; provided that the sole and exclusive remedy for breach of this Undertaking shall be an action to compel specific performance of the obligations of the Issuer hereunder and no person or entity shall be entitled to recover monetary damages hereunder under any circumstances. Failure to comply with any provision of this Undertaking shall not constitute an event of default on the Securities.

Section 4. Parties in Interest. This Undertaking is executed to assist the Purchaser to comply with (b)(5) of the Rule and is delivered for the benefit of the Holders. No other person shall have any right to enforce the provisions hereof or any other rights hereunder.

Section 5. Amendments. Without the consent of any holders of Securities, the Issuer at any time and from time to time may enter into any amendments or changes to this Undertaking for any of the following purposes:

(a) to comply with or conform to any changes in Rule 15c2-12 (whether required or optional);

(b) to add a dissemination agent for the information required to be provided hereby and to make any necessary or desirable provisions with respect thereto;

(c) to evidence the succession of another person to the Issuer and the assumption of any such successor of the duties of the Issuer hereunder;

(d) to add to the duties of the Issuer for the benefit of the Holders, or to surrender any right or power herein conferred upon the Issuer;

(e) to cure any ambiguity, to correct or supplement any provision hereof which may be inconsistent with any other provision hereof, or to make any other provisions with respect to matters or questions arising under this Undertaking which, in each case, comply with Rule 15c2-12 or Rule 15c2-12 as in effect at the time of such amendment or change;

provided that no such action pursuant to this Section 5 shall adversely affect the interests of the Holders in any material respect. In making such determination, the Issuer shall rely upon an opinion of nationally recognized bond counsel.

Section 6. Termination. This Undertaking shall remain in full force and effect until such time as all principal, redemption premiums, if any, and interest on the Securities shall have been paid in full or the Securities shall have otherwise been paid or legally defeased in accordance with their terms. Upon any such legal defeasance, the Issuer shall provide notice of such defeasance to the EMMA System. Such notice shall state whether the Securities have been defeased to maturity or to redemption and the timing of such maturity or redemption.

Section 7. Undertaking to Constitute Written Agreement or Contract. This Undertaking shall constitute the written agreement or contract for the benefit of Holders of Securities, as contemplated under Rule 15c2-12.

Section 8. Governing Law. This Undertaking shall be governed by the laws of the State of New York determined without regard to principles of conflict of law.

IN WITNESS WHEREOF, the undersigned has duly authorized, executed and delivered this Undertaking as of **October 22, 2026.**

GREENPORT UNION FREE SCHOOL DISTRICT

By _____
President of the Board of Education