



OFFICE OF THE CONTROLLER

CITY AND COUNTY OF SAN FRANCISCO

Greg Wagner
Controller

ChiaYu Ma
Deputy Controller

Anna Van Degna
Director of Public Finance

June 2, 2025

Supervisor Jackie Fielder
City Hall, Room 244
City and County of San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Supervisor Fielder:

Thank you for agreeing to introduce the Board of Supervisors resolution approving, for the purposes of the Internal Revenue Code, the issuance of tax-exempt obligations (the "Obligations") by the California Enterprise Development Authority (the "Issuer") on behalf of La Scuola International School, a California nonprofit benefit corporation and an organization described in Section 501(c)(3) of the Code ("Borrower"), to finance and/or refinance certain capital facilities owned and operated by the Borrower as summarized below. I respectfully request the introduction of the resolution at the meeting of the Board of Supervisors on Tuesday, June 3 or June 10, 2025.

Pursuant to the Tax Equity and Fiscal Responsibility Act (TEFRA), to facilitate the tax exemption of interest on the Obligations, the City is required to conduct a public hearing and to approve the financing by the Issuer. The Office of Public Finance held such a hearing on Thursday, May 29, 2025, notice of which was published on the Controller's Office of Public Finance Public Notices page on May 21, 2025. No public comments were heard or received through the public hearing process. The action by the Board will acknowledge that the hearing was duly held and that the financing is proceeding. The Obligations will be issued in an aggregate principal amount not to exceed \$10 million.

The Borrower

La Scuola International School ("La Scuola") is an International Baccalaureate (IB) World School serving students from preschool through grade 8. Founded in 2002, La Scuola offers over 400 students a diverse, multilingual and multicultural language immersion curriculum at its San Francisco Dogpatch and Mission campuses and Silicon Valley campus. La Scuola's stated mission to "inspire brave learners to shape the future" is paired with its values of cultural curiosity, international awareness and embracing differences in its students and the community. Partnering with the SMART (Schools, Mentoring and Resource Team Inc.) program, La Scuola also accepts students from families in the lowest income quartile in San Francisco.

The Project

The proceeds from the sale of the Obligations will be loaned to the Borrower for the purpose of refinancing a portion of the California Infrastructure and Economic Development Bank Educational Facility Revenue Bonds (La Scuola International School Project) issued in 2024. These bonds financed the construction and development of educational facilities owned and operated by La Scuola at its San Francisco and Silicon Valley campuses noted above.

Financing Information

Assuming all required approvals are obtained, the Issuer expects to issue the Obligations in an amount not to exceed \$10 million for the purpose described above. The Obligations will be acquired by accredited investors pursuant to the terms of an Indenture between California Enterprise Development Authority and Wilmington Trust as Trustee. Bond Counsel on the transaction is Kutak Rock LLP.

Public Approval Process

The City and County of San Francisco is a participating member of the Issuer, a joint powers authority. The Issuer is authorized to issue bonds, notes, certificates of participation, or other forms of indebtedness, including refunding previously issued debt. As noted above, federal tax law requires that the governing body of the jurisdiction in which the project is located approve the financing and the project after providing the opportunity for a duly-noticed public hearing before the Obligations may be issued on a tax-exempt basis. Your assistance with this matter is greatly appreciated. While the Office of Public Finance has reviewed the proposed TEFRA notice and resolution, the Office of Public Finance has performed only a limited high-level review of the proposed financing as no City resources are pledged or will be available for the repayment of the Obligations. Please contact me at (628) 652-9652, if you have any questions or require additional information. Thank you.

Sincerely,

Keith Sevigny

Principal Administrative Analyst
Office of Public Finance