

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that a public hearing pursuant to Section 147(f) of the Internal Revenue Code of 1986, as amended (the "Code"), will be held by the Monroe County Industrial Development Corporation (the "Issuer") on the 13th day of June, 2017 at 7:45 a.m. local time, at the office of M&T Bank, 180 S. Clinton Avenue, 7th Floor, Rochester, New York 14614, in connection with the following matter:

The JEWISH HOME OF ROCHESTER SENIOR HOUSING, INC. (D/B/A THE SUMMIT AT BRIGHTON), its successors or designees (the "Institution"), a New York not-for-profit corporation, has requested that the Issuer finance and/or refinance, through the issuance of one or more series of its revenue refunding bonds in an aggregate principal amount not to exceed \$8,500,000 (the "Bonds"), a certain project, as more particularly described below (the "Project"), and to provide funds for all or a portion of the costs of issuing the Bonds, defeasance of the Series 2006 Bonds (as defined below), credit enhancement fees relating to the Bonds, if any, funding a debt service reserve fund, if any, and capitalized interest, if any. All of the facilities financed and/or refinanced with the Bonds are or will be owned and/or operated by the Institution, and are or will be located at 2000 Summit Circle Drive and 4000 Summit Circle Drive in the Town of Brighton, New York.

The Project consists of the refunding of the outstanding principal amount of the \$9,680,000 original principal amount Civic Facility Revenue Refunding Bonds (Summit at Brighton Project), Series 2006 (the "Series 2006 Bonds") issued by the County of Monroe Industrial Development Agency ("COMIDA") for the benefit of the Institution.

The proceeds of the Series 2006 Bonds were applied to pay the costs of a certain project (collectively, the "2006 Project") consisting of (A) the refunding of the then outstanding principal amount of the \$18,105,000 original principal amount Life Care Community Revenue Bonds, Series 1997 A and B (the "Series 1997 Bonds") issued by COMIDA for the benefit of the Institution, (B) the funding of a debt service reserve fund for the Series 2006 Bonds and (C) the payment of certain costs and expenses incidental to the issuance of the Series 2006 Bonds. The proceeds of the Series 1997 Bonds were applied to pay the costs of a certain project (collectively, the "1997 Project") consisting of: (i) the acquisition of approximately 26 acres of land located at 2000 Summit Circle Drive and 4000 Summit Circle Drive in the Town of Brighton, County of Monroe, New York (collectively, the "Land"); (ii) the construction of an approximately 152,000 square-foot continuing care retirement community located on the Land, including 90 senior independent living apartments and 30 assisted living apartments (the "Improvements"); (iii) the purchase and installation of various items of machinery, equipment and furnishings used in the Improvements (the "Equipment", and together with the Land and the Improvements, the "Facility"); (iv) the payment of certain costs and expenses incidental to the issuance of the Series 1997 Bonds; and (v) the funding of a debt service reserve fund for the Series 1997 Bonds.

It is intended that interest on the Bonds will not be included in gross income for federal income tax purposes pursuant to Section 103(a) of the Code. The Bonds will be special limited obligations of the Issuer payable solely from certain amounts payable by the Institution under a loan agreement or other financing agreement with the Institution and certain other assets, if any,

of the Institution pledged for the repayment of the Bonds. THE BONDS SHALL NOT BE A DEBT OF THE STATE OF NEW YORK OR ANY POLITICAL SUBDIVISION THEREOF, INCLUDING THE COUNTY OF MONROE, AND NEITHER THE STATE OF NEW YORK NOR ANY POLITICAL SUBDIVISION THEREOF, INCLUDING THE COUNTY OF MONROE, SHALL BE LIABLE THEREON.

Approval of the issuance of the Bonds by the County of Monroe is necessary in order for the interest on the Bonds to be excluded from gross income for federal income tax purposes.

The Issuer will, at the above-stated time and place, hear all persons with views in favor of or opposed to either the location or nature of the Facility, or the proposed issuance of the Bonds by the Issuer. In addition, at, or prior to, such hearing, interested parties may submit to the Issuer written materials pertaining to such matters.

Dated: May 28, 2017

MONROE COUNTY INDUSTRIAL
DEVELOPMENT CORPORATION