



CITY OF PHILADELPHIA

LAW DEPARTMENT
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Philadelphia, PA 19102-1595

DIANA P. CORTES
City Solicitor
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March 16, 2023

Honorable Darrell L. Clarke, President
City Council of Philadelphia
City Hall Room 313
Philadelphia, PA 19107

Re: City of Philadelphia Water and Wastewater Revenue Bonds
Twenty-Seventh Supplemental Ordinance (Bill No. 230079)

Dear Council President Clarke:

The office of the City Solicitor has reviewed The First Class City Revenue Bond Act, the Amended and Restated General Water and Wastewater Revenue Bond Ordinance of 1989 (Bill No. 544) approved June 24, 1993, as supplemented (the "General Ordinance") and the proposed Twenty-Seventh Supplemental Ordinance thereto, Bill No. 230079 (the "Twenty-Seventh Supplemental Ordinance"). The General Ordinance and the Twenty-Seventh Supplemental Ordinance authorize the issuance and sale of (i) one or more series or subseries of Water and Wastewater Revenue Bonds of the City of Philadelphia in the maximum aggregate principal amount of Nine Hundred Forty-Five Million Dollars (\$945,000,000) and (ii) one or more series or subseries of Water and Wastewater Revenue Refunding Bonds of the City of Philadelphia for the purpose of refunding only bonds issued under the Twenty-Seventh Supplemental Ordinance (collectively, "Bonds").

Based on that review, it is my opinion that under the General Ordinance and the Twenty-Seventh Supplemental Ordinance, as introduced in Council, the registered owners of any series or subseries of the Bonds will have no claim upon the taxing power or general revenues of the City of Philadelphia, nor will they have any lien upon any property of the City of Philadelphia other than the Project Revenues (as defined in the General Ordinance) and the funds properly pledged to such registered owners pursuant to the terms and conditions of the General Ordinance and the Twenty-Seventh Supplemental Ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "Diana P. Cortes".

Diana P. Cortes
City Solicitor