548 Broadway Monticello, New York 12701 (845) 428-7575 (845) 428-7577 TTY 711

December 9, 2019



To Whom It May Concern:

Re: New York State Sales and Use Tax Exemption

County of Sullivan Industrial Development Agency with

Monticello Corp. ("Company")

Pursuant to TSB-M-87(7) issued by the New York state Department of Taxation and Finance on April 1, 1987, you have requested a letter from the County of Sullivan Industrial Development Agency ("Agency") containing the information required by said policy statement regarding the sales tax exemption of purchases, leases of rentals of building materials, furniture, fixtures, equipment and supplies to be used in counterion with the acquisition, construction, installation and equipping of the following described project (the "Project"):

(i) construction, installation and equipping of a building ("Building") to consist of the following: (a) fixing or replacing front center siding; (b) adding a second floor center window; (c) addition of front entrance doors; (d) redesigning a front entrance; (e) repairing and repainting balance of front; (f) removing interior front partitions to open store front, (g) insulating and raising interior second floor; (h) adding plywood and residing open areas on second floor; and (i) installing awnings and replacing with the director sign situate on one (1) parcel of real estate consisting of <100 acre to be located at 457 Broadway in the Village of Monticello, Town of Thoropson ("Town"), County of Sullivan, State and identified on the Town tax map as Section 115, Block 6, Lot 2 ("Land"); (ii) acquisition and installation thereon and therein of certain furniture, fixtures, machinery, equipment and tools ("Equipment"); (iii) construction of improvements to the Building, the Land and the Equipment (collectively, the Building, the Land and the Equipment are referred to as the "Project" or "Facility"); and (iv) lease of the Project from the Agency to the Company.

On June 10, 2019, the Agency, a corporate governmental Agency constituting a body corporate and politic and a public benefit corporation and a governmental agency of the State of New York adopted a resolution whereby the Agency appointed the Company as its agent to acquire, construct, reconstruct, demolish, renovate, install and equip the Project.

^{*} This Sales Tax Exemption Letter shall not be used to abate sales tax on purchases of motor vehicles.

This is to certify that purchases, leases or rentals by the Agency, through its agent, the Company, of materials to be incorporated into the Project and purchases, leases or rentals of supplies, tools, equipment, or services necessary to acquire, construct, reconstruct, demolish, renovate, install and equip such Project are exempt from any sales or use tax imposed by the State of New York and any governmental instrumentality located within the State of New York.

It is further certified that since the Agency is a public benefit corporation, neither it, nor the Company as its agent, is required to furnish an "Exempt Organization Certificate" in order to secure exemption from sales or use tax for such items.

A copy of this letter retained by any vendor or seller to the Comp ny as agent for the Agency, may be accepted by such vendor or seller as a "statement and additional documentary evidence of such exemption" as provided by New York Tax Law 1(32(c)(2), thereby relieving such vendor or seller from the obligation to collect sales or use tax upon purchases or rentals of such materials, supplies, tools, equipment, or services by the Agency through its agent, the Company.

THIS LETTER SHALL BE IN EFFECT FROM JANUARY 1, 2020 THROUGH AND INCLUDING JUNE 30, 2020.

In the event you have any questions with respect to the above, please do not hesitate to contact me.

County of Sullivan Industrial Development Agency

By: Edward T. Sykes, Chief Executive Officer

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