

**Rule 15c2-12 Filing Cover Sheet**

**Issuer Name:** Judson Independent School District  
8012 Shin Oak Drive  
Live Oak, Texas 78233

**Issues:** Unlimited Tax School Building and Refunding Bonds, Series 2007

**Filing Format**  electronic <sup>SM</sup>  paper; If available on the Internet, give URL: emma.msrb.org

**CUSIP Numbers to which the information filed relates (optional):**

Nine-digit number(s) (attach additional sheet if necessary):

Six-digit number if information filed relates to all securities of the issuer: 481304

\* \* \*

**Description of Material Event Notice/Other Material Information**

- 1.  Principal and interest payment delinquencies
- 2.  Non-payment related defaults
- 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 or events affecting the tax-exempt status of the security
- 7.  Modifications to rights of security holders
- 8.  Bond calls
- 9.  Defeasances
- 10.  Release, substitution, or sale of property securing repayment of the securities
- 11.  Rating changes
- 12.  Notice of non-compliance: failure to provide annual financial information
- 13.  Other material event or information (specify) Notice of IRS Examination

**Financial & Operating Data Disclosure Information**  
(Financial information should not be filed with the MSRB)

- Annual Financial Report or CAFR
- Financial Information & Operating Data
- Other (describe) \_\_\_\_\_

Fiscal Period Covered: \_\_\_\_\_

- Monthly
- Quarterly
- Annual
- Other: \_\_\_\_\_

\* \* \*

I hereby represent that I am authorized by the Issuer or its agent to distribute this information publicly:

Name: W. Jeffrey Kuhn Title Bond Counsel  
Employer: Norton Rose Fulbright US LLP, 300 Convent, Suite 2100, San Antonio, Texas 78205  
Voice Telephone Number: (210) 270-7131  
Email Address: [w.jeffrey.kuhn@nortonrosefulbright.com](mailto:w.jeffrey.kuhn@nortonrosefulbright.com)

MATERIAL EVENT FILING  
(Pursuant to S.E.C. Rule 15c2-12)

Dated: November 29, 2016

JUDSON INDEPENDENT SCHOOL DISTRICT  
8012 Shin Oak Drive  
Live Oak, Texas 78233

Pertaining to:

OFFICIAL STATEMENT, dated April 18, 2007  
\$240,779,222.55 Unlimited Tax School Building and Refunding Bonds, Series 2007

**INTRODUCTION**

The information in this filing is provided solely to comply with the contractual commitment of the Judson Independent School District (the "District") included in the order of the District's governing body authorizing the hereinafter-defined Obligations, pursuant to which commitment the District is required to provide notice of certain material events specified therein with respect to the \$240,779,222.55 Unlimited Tax School Building and Refunding Bonds, Series 2007, dated April 1, 2007 (the "Obligations"), to identified parties. This filing is not made by the District in connection with a purchase or sale of bonds and accordingly is not intended to contain all information material to a decision to purchase or sell bonds.

Judson Independent School District  
8012 Shin Oak Drive  
Live Oak, Texas 78233  
Contact Person: Mr. Jose D. Elizondo, Jr., Chief Financial Officer

**RECEIPT OF RANDOM INTERNAL REVENUE SERVICE AUDIT**

On November 28, 2016, the District received a notice, dated October 27, 2016 from the Internal Revenue Service (the "Service") that the Service would be conducting an examination of the Obligations. A copy of this letter is attached hereto as Exhibit A. The Notice states that the Service has no reason to believe that the Obligations fail to comply with applicable federal tax requirements. The District has complied, or expects to comply, with the requests of the Service made in this notice.

**MISCELLANEOUS**

The information set forth herein has been obtained from the District's records and other sources which are considered reliable.

Any statement in this filing which includes a matter of opinion, whether or not expressly so stated, is intended as such, and not as a representation of fact. The information contained in this filing is provided as of the respective dates specified herein and is subject to change without notice, and the filing of this filing shall not, under any circumstances, create any implication that there has been no change in the affairs of the District or in the other matters described herein since the date as of which such information is provided.

In the Official Statement, the District disclaims any contractual or tort liability for damages resulting in whole or in part from any breach of its continuing disclosure agreement or from any statement made pursuant to its agreement, although holders of the Obligations may seek a writ of mandamus to

compel the District to comply with its agreement. See “CONTINUING DISCLOSURE OF INFORMATION” in the Official Statement.

**EXHIBIT A**

Notification of Examination from the Internal Revenue Service



Department of the Treasury  
Internal Revenue Service  
**Tax Exempt and Government Entities**  
12900 N. Meridian St., Suite 360  
Hamilton Crossing IV  
Carmel, IN 46032

Judson Independent School District  
Montoya Carl, Superintendent of Schools  
8012 Shin Oak Drive  
Live Oak, TX 78233

**Date:**  
October 27, 2016  
**Person to contact / ID number:**  
Carol Duff  
Employee ID number: 1000229902  
**Contact telephone number:**  
317-581-5732  
**Contact fax number:**  
855-243-0745  
**Manager's name / ID number:**  
Carmen B. Zucker  
Manager ID number: 1000901583  
**Manager's telephone number:**  
212-436-1441  
**Form:**  
8038-G  
**Issue date:**  
May 10, 2007

Re: \$240,779,222.55 Judson Ind. School Dist. Unlimited Tax School Bldg. & Refunding Bonds, Series 2007  
Dear Sir or Madam:

**Why you're receiving this letter**

We selected your debt issuance named above (Bonds) for audit.

**Why we selected this debt issuance**

We routinely examine municipal debt issuances to determine compliance with federal tax requirements. There are several ways we select a municipal debt issuance for examination. We may select it as part of an initiative, project or referral, due to a questionable or unusual item on the return, or as a random selection. We use a centralized case selection and review process to enhance consistency of enforcement activities, and to focus resources on areas having the most positive impact on municipal debt issuances. Our tasks include identifying areas of noncompliance, developing corrective strategies, and assisting with those strategies.

**Information document request**

We are enclosing Form 4564, *Information Document Request*, listing the items I need to conduct the audit. If you have questions about this request, need more time to provide certain items, or want to suggest alternatives to certain documents or information, you can call me.

**Your rights as a taxpayer**

Publication 1, *Your Rights as a Taxpayer*, includes information about your rights as a taxpayer, the audit process, and procedures required for third-party contacts. Take a few minutes to read it. Some aspects of audits of tax-advantaged Bonds are different from those described in Publication 1. You can find this publication at [www.irs.gov/Forms-&-Pubs](http://www.irs.gov/Forms-&-Pubs).

**Audit process**

I'll review the information you provide and contact you with any questions I have or if I need additional information. I may need to interview someone familiar with the Bonds. If I need to tour the bond-financed facilities, I'll schedule a visit with you.

After completing my review, I'll discuss my findings with you and explain if the tax-advantaged status of your Bonds is affected. Many cases involve no proposed changes to the Bonds' status. If I find potential problems with the Bonds' qualification, I'll explain your options to resolve the problems without affecting the holders of the Bonds.

If you don't agree with my determination, I'll prepare written findings and explain the appeal procedures. You can request a conference with my manager or an IRS Appeals official because a final adverse determination may impact the holders of the Bonds.

### **Representation**

The IRS handles your tax return information, including this audit, confidentially. You can have someone represent you during any part of the audit, or you can authorize me to disclose information to another party who is not your representative. If you want someone to represent you, provide a completed Form 2848, *Power of Attorney and Declaration of Representative*, to me. If you want to authorize someone else to receive confidential information during this audit, provide a completed Form 8821, *Tax Information Authorization*, to me. Both Forms 2848 and 8821 are available at [www.irs.gov/forms-&-pubs](http://www.irs.gov/forms-&-pubs). I enclosed special instructions to assist you in completing the **Taxpayer Information** and **Tax Matters** sections of Forms 2848 and 8821 for municipal debt issuances.

### **Communication**

You can call me to discuss any potential issues and keep me informed of unavoidable delays, and I'll do likewise. The audit will proceed faster if we address questions and concerns, and provide information to each other in a timely manner. You can also speak to my manager at any time. My manager's name and telephone number are listed at the top of this letter.

Thank you for your cooperation in this matter.

Sincerely,



Carol Duff

Internal Revenue Agent, Tax Exempt Bonds

Enclosures:

Form 4564

Publication 1

Supplemental instructions for completing Form 2848 or 8821

<b>Form 4564</b>	<b>Department of the Treasury Internal Revenue Service Information Document Request</b>	<b>Request Number 01</b>
<b>To: (Name of Taxpayer and Company, Division or Branch) Judson Independent School District</b>	<b>Subject: Examination of the tax-advantaged status of the Bonds described below</b>	
	<b>Submitted to:</b> Montoya Carl, Superintendent of Schools	
	<b>Dates of Previous Requests:</b> N/A	

**Description of Documents Requested:**

**Re: \$240,779,222.55 Judson Independent School District (A political subdivision of the State of Texas located in Bexar County, Texas) Unlimited Tax School Building and Refunding Bonds, Series 2007 (the "Bonds")**

**Please provide the following requested information by the date indicated below. If you have questions about the information requested or you will not be able to provide the information by the date specified, please contact the requestor identified below. Providing as many of the documents as possible on a rewritable CD or other electronic media will facilitate the examination process.**

**General**

- (1) Please provide a description of the current status of the Bonds (i.e., outstanding, retired, refunded, defeased, etc.).
- (2) If any of the Bonds have been partially or totally refunded, please identify the CUSIP numbers for the refundings, and provide copies of the Official Statements if not available on the MSRB-EMMA website and any verification report created if the refunding transaction was an advance refunding.
- (3) Please provide a schedule of the total interest expense paid on the Bonds from the issue date to the most recent interest payment date.
- (4) Please provide a complete copy of the bond transcript.
- (5) Please provide copies of any and all amendments to the documents contained in the bond transcript (e.g., trust indenture, management contracts, etc.).

**Proceeds**

- (6) Please identify the proceeds (as defined in 1.148-1(b)) of the Bonds, including:
  - (a) Sale proceeds,
  - (b) Investment proceeds,

<b>Information Due By</b>	November 17, 2016	<b>At Next Appointment</b>		<b>Mail In</b>	<input checked="" type="checkbox"/>
<b>FROM</b>	<b>Name and Title of Requestor</b> Carol Duff, Internal Revenue Agent      Employee Number 1000229902			<b>Date:</b> Oct. 27, 2016	
	<b>Office Location:</b> 12900 N. Meridian St., Suite 360 Hamilton Crossing IV Carmel, IN 46032			<b>Phone: Voice</b> 317-581-5732 <b>FAX</b> 855-243-0745 <b>Email:</b> carol.duff@irs.gov	
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	<b>Dates of Previous Requests:</b> N/A	

**Description of Documents Requested:**

- (c) Transferred proceeds, and
- (d) Replacement proceeds.
- (7) Please identify the amount of proceeds of the Bonds used for a reasonably required reserve and replacement fund.
- (8) Please describe the accounting method used to account for gross proceeds, investments, and expenditures of the Bonds and how this accounting method is reflected in the issuer's books and records. (Note: If an issuer fails to maintain books and records sufficient to establish the accounting method used for an issue and the allocation of the proceeds of that issue, specific tracing method must be used.)
- (9) Have there been any bona fide deviations from the accounting method used? If so, please describe.

**Arbitrage and Yield Restriction**

- (10) Please provide a copy of the any rebate report prepared for the Bonds.
- (11) Please provide a copy of any spending exception report or small issuer report prepared for the Bonds which is not a part of the rebate report.
- (12) Please provide a copy of any yield restriction analysis prepared for the Bonds.
- (13) Please provide a computation of the yield on the Bonds.
- (14) Please provide a description of any qualified guarantee whose costs are treated as additional interest costs in determining the yield on the Bonds, including a copy of all agreements and associated certificates.
- (15) If any portion of the proceeds of the Bonds were used to advance refund the debt service of another issue, please provide a copy of the verification report for any escrow fund established.
- (16) Please describe any funds other than those identified in the tax certificate which have been pledged as security or otherwise made available to pay debt service on the Bonds. Such funds may include amounts received from grants, dedicated tax revenues (such as ad valorem taxes), endowment funds, deposits, or other funds

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	<b>Office Location:</b> 12900 N. Meridian St., Suite 360 Hamilton Crossing IV Carmel, IN 46032				<b>Page 2</b>
	<b>Phone: Voice</b> 317-581-5732 <b>FAX</b> 855-243-0745 <b>Email:</b> carol.duff@irs.gov				



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	<b>Submitted to:</b> Montoya Carl, Superintendent of Schools	
	<b>Dates of Previous Requests:</b> N/A	

**Description of Documents Requested:**

- required to be maintained at a certain level.
- (17) Please provide copies of trust statements for all accounts established under the trust indenture or otherwise pledged to the Bonds. Include all statements for the bond year leading up to the most recent computation date.
- (18) Please provide a statement of assets, or other documentation, showing the value of each nonpurpose investment held in each account purchased with gross proceeds of the Bonds for any date the investments must be valued (e.g., a computation date).
- (19) If a rebate report has not been prepared in connection with the Bonds, please provide the following:
- (a) a description of how the issuer ensures the yield restriction and the arbitrage rebate requirements have been met;
  - (b) a description of any financial derivative products, such as swaps, options, floats, caps, collars, etc., that were integrated in the computation of the yield on the Bonds;
  - (c) a description of any financial derivative products related to the Bonds which were not integrated;
  - (d) a description of any investments of proceeds of the Bonds whose yield exceeded the yield on the Bonds, whether during any temporary period or not; and
  - (e) a description of any exception from rebate the Bonds have qualified for.
- (20) Please provide a copy of the latest Form 8038-T, if filed.

**Record Retention / Post Issuance**

- (21) Internal Revenue Code section 6001 requires that every person liable for any tax imposed by title 26 of the U.S. Code shall keep such records, render such statements, make such returns, and comply with such rules and regulations as the Secretary may from time to time prescribe. Have adequate records necessary to substantiate compliance and support the continued exclusion from gross income of

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	<b>Dates of Previous Requests:</b> N/A	

**Description of Documents Requested:**

the interest paid on the Bonds been retained? If "No", please describe any deficiencies in the records retained.

- (22) Are there written procedures, other than bond documents provided at closing, which contain the following key characteristics to ensure that violations are timely identified and corrected so that the Bonds remain in compliance with federal tax requirements from the time they are issued until they are no longer outstanding?
- (a) Due diligence review at regular intervals?
  - (b) Identification and training of the officer or employee responsible for review?
  - (c) Retention of adequate records to substantiate compliance (e.g., records relating to the allocation of proceeds, etc.)?
  - (d) Procedures reasonably expected to timely identify noncompliance?
  - (e) Procedures to ensure that steps will be taken to timely correct noncompliance?

**Power of Attorney**

- (23) Please complete and email or fax Form 2848 if you intend to have a representative handle this examination. (See enclosure on proper completion of Form 2848 for tax exempt bond examinations.)

**The information requested above is to assist us in determining compliance of your bond issue with the relevant tax exempt bond provisions of IRC sections 103, and 141 through 150 of the Internal Revenue Code.**

**Additional information may be requested at a later date if needed.**

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