Offering Circular Dated November 20, 2020

THIS IS NEITHER AN OFFER TO SELL, NOR A SOLICITATION OF AN OFFER TO BUY, ANY OF THESE SECURITIES

REFUNDING ISSUE BANK QUALIFIED

$435,000
PLAINVIEW RURAL FIRE PROTECTION DISTRICT, NEBRASKA
REFUNDING BONDS, SERIES 2020 (Limited Obligation)

Dated: December 22, 2020 Due as shown below

Interest payable semiannually February 15 and August 15
of each year starting February 15, 2021

Book Entry Form $5,000 Denomination or Multiples Thereof

AMOUNTS, MATURITIES AND PRICES

Type	Amount	Maturity February 15	Interest Rate	Yield	Price	CUSIP
Term	$ 130,000	2022	0.45%	0.45%	100.0%	72669P BG9
Term	150,000	2024	0.55	0.55	100.0	72669P BH7
Term	155,000	2026	0.70	0.70	100.0	72669P BJ3

AUTHORITY: The above-captioned bonds (the **"Bonds"**) are being issued pursuant to a Resolution (the **"Resolution"**) adopted by the President and Board of Directors of Plainview Rural Fire Protection District in the State of Nebraska (the **"District"**) on November 9, 2020 in accordance with Section 10-142, R.R.S. Nebraska 2012 and 35-508(13), R.R.S. Nebraska 2012 (the **"Authorizing Legislation"**).

LEGALITY: To be approved by Rembolt Ludtke LLP, Lincoln, Nebraska.

PURPOSE & SECURITY: The Bonds are being issued for the purpose of refunding the District's outstanding Refunding Bonds (Limited Obligation), dated June 22, 2011, in the outstanding principal amount of $425,000. In the opinion of Counsel, the Bonds are valid and legally binding obligations of the District, both principal and interest, payable from a special, limited tax of not more than the levy authorized by Section 35-508(13), R.R.S. Nebraska, 2016, on the taxable value of all the taxable property within the District. The maximum allowable levy is 10.5 cents per $100 valuation. At the District's valuation of $472,276,724 (Fiscal year 2020-21), this maximum levy would produce $495,891. The maximum annual debt service for this bond issue is $80,560. The District's valuation is subject to change annually. **In the opinion of Counsel, interest on these bonds is not includable in gross income for purposes of Federal and Nebraska state income taxes.**

THIS OFFERING CIRCULAR IS NOT AN OFFICIAL STATEMENT - SEE 'RISK FACTORS' HEREIN.

First National Capital Markets

THE ISSUER

Plainview Rural Fire Protection District is located in northeast Nebraska in Pierce and Antelope Counties, approximately 40 miles northwest of Norfolk. The District contains approximately 87,360 acres. The economy of the area is agricultural with the raising of corn and livestock of primary importance.

The City of Plainview has a population of 1,246 (2010 Census) and offers a variety of amenities including a hospital, clinic, nursing home and pharmacy. It has both a public and private elementary schools and public high school and is just 35 minutes in proximity to a community college. Banking services are provided by Midwest Bank and Madison County Bank.

District Leadership

Member	Term Expires
Brian Doerr - *President*	Every 4 Years
Scott Clark – *Vice President*	Every 4 Years
Kyle Tarr – *Secretary/Treasurer*	Every 4 Years
Merle Weber – *Member*	Every 4 Years
Mark Gubbles – *Member*	Every 4 Years

DIRECT, UNDERLYING & OVERLAPPING INDEBTEDNESS

The following table summarizes certain financial information concerning the District.

General Information and Direct Debt

Plainview Rural Fire District Taxable Valuation (2020-21)	$472,276,724
Direct General Obligation Debt (*this issue only*)	$435,000
Direct Debt to Taxable Valuation	0.09%
Overlapping and Underlying G.O. Debt	$2,235,251
Total Direct, Overlapping and Underlying G.O. Debt	$2,670,251
Acres in District (approx.)	87,360
Ratio of Direct, Overlapping and Underlying Debt to Taxable Valuation	0.57%
Direct Debt per Acre	$4.98

Overlapping and Underlying Debt

Overlapping Debt	
Pierce County	
Taxable Valuation (2019-20)	$1,932,407,476
General Obligation Debt	$1,250,000
Applicable to District (21.93%)	$273,875
Antelope County	
Taxable Valuation (2019-20)	$2,483,485,076
General Obligation Debt	6,415,000
Applicable to District (2.05%)	$126,376
*Pierce County School District 0005**	
Taxable Valuation (2019-20)	$715,003,192
General Obligation Debt	$0
Applicable to District (NA)	$0

Underlying Debt

City of Plainview

Taxable Valuation (2019-20)	$46,785,590
General Obligation Debt	$1,835,000
Applicable to District (100.00%)	$1,835,000

**Plainview Public Schools has a Series 2018 Certificates of Participation outstanding in the amount of $430,000.*

.

PROPERTY TAX INFORMATION

Historical Property Valuations

Listed below are the total assessed valuations of all taxable tangible property situated in the District for the years indicated:

Year	Valuation	% Change
2020-21	$472,276,724	-0.50%
2019-20	474,644,869	-3.52%
2018-19	491,980,642	1.40%
2017-18	485,170,020	-1.39%
2016-17	492,024,517	3.04%

Tax Rates

Listed below are the tax rates for the District for the years indicated:

Year	Levy
2020-21	$0.03505
2019-20	0.03386
2018-19	0.03209
2017-18	0.03250
2016-17	0.03068

THE BONDS

General - The District is issuing the Bonds as fully registered bonds which, when initially issued, will be registered in the name of Cede & Co., as nominee of The Depository Trust Company, New York, New York (**"DTC"**). DTC is acting as securities depository for the Bonds. Purchases of Bonds are being made in book-entry-only form, in the principal amount of $5,000 or integral multiples thereof, through brokers and dealers who are, or who act through, DTC's Direct Participants. Beneficial owners of the Bonds will not receive physical delivery of bond certificates so long as DTC or a successor securities depository acts as the securities depository with respect to the Bonds.

Payment of Bonds – The District Treasurer, as Registrar and Paying Agent with respect to the Bonds (the **"Registrar"**), will pay interest due on the Bonds by check or draft mailed to the registered owners at their registered addresses, both as shown on the registration books of the Registrar at the close of business on the fifteenth day (whether or not a business day) immediately preceding each Interest Payment Date (the **"Record Date"**). Interest is computed on the basis of a 360-day year consisting of twelve 30-day months. The Registrar will pay the principal of the Bonds at maturity or earlier date of redemption upon presentation and surrender of the Bonds at the office of the Registrar.

The foregoing procedures and methods for payment will apply if the provisions for global book-entry bonds as described below cease to be in effect and will apply to the holding and transfer of Bonds by DTC subject to certain modifications provided for in a Letter of Representations between the District and DTC. **SO LONG AS DTC OR ITS NOMINEE IS THE REGISTERED OWNER OF THE BONDS, PAYMENT OF THE PRINCIPAL OR THE REDEMPTION PRICE THEREOF AND THE INTEREST THEREON WILL BE MADE DIRECTLY TO DTC**.

If payments of interest due on the Bonds on any Interest Payment Date are not timely made, such interest shall cease to be payable to the registered owners as of the Record Date for such Interest Payment Date and shall be payable to the registered owners as of a special date of record for payment of such defaulted interest as shall be designated by the Registrar whenever moneys for the purpose of paying such defaulted interest become available.

Redemption Provisions

Optional Redemption. The Bonds shall be subject to redemption, in whole or in part, prior to maturity at any time on or after the fifth anniversary of the date of original issue thereof, at par plus the interest accrued on the principal amount being redeemed to the date fixed for redemption. If less than all of the Bonds of any maturity are to be called for redemption, the Registrar shall select the particular Bonds of such maturity to be redeemed by lot in multiples of $5,000, or any integral multiple thereof, within a maturity.

Mandatory Redemption. The Bonds maturing as term bonds on February 15 in the years 2022, 2024, and 2026 are subject to mandatory redemption prior to maturity by lot in such manner as the Paying Agent may determine through the operation of mandatory sinking fund payments, at the principal amount to be redeemed plus accrued interest to the redemption date, as follows:

$130,000 Term Bond Maturing February 15, 2022

Date	Amount Required to be Redeemed
February 15, 2021	$60,000
February 15, 2022	70,000

$150,000 Term Bond Maturing February 15, 2024

Date	Amount Required to be Redeemed
February 15, 2023	$75,000
February 15, 2024	75,000

$155,000 Term Bond Maturing February 15, 2026

Date	Amount Required to be Redeemed
February 15, 2025	$75,000
February 15, 2026	80,000

Notice of Redemption. Notice of the call for redemption, identifying the Bonds or portions thereof to be redeemed, shall be given by the Registrar to the registered owners of the Bonds to be redeemed at their registered addresses as shown on the registration books maintained by the Registrar, by first class mail, postage prepaid, not less than 30 days prior to the date fixed for redemption (or such shorter period as may be acceptable to the then registered owner of the Bonds). Failure to give notice to any particular registered owner or any defect in the notice given to such owner shall not affect the validity of the proceedings calling the Bonds for redemption or the redemption of any Bonds for which proper notice has been given.

Effect of Redemption. If notice of redemption has been properly given or waived and moneys for payment are available on the redemption date, the Bonds so called for redemption shall, on the redemption date, become due and payable and shall cease to bear interest and shall cease to be entitled to any lien, benefit or security under the Resolution and the owners of the Bonds so called for redemption shall have no rights under the Resolution except to receive payment of the redemption price plus accrued interest to the date fixed for redemption from funds deposited with the Registrar by the District. If less than all of the Bonds of any maturity are to be called for redemption, the particular Bonds of such maturity to be redeemed shall be selected by lot in multiples of $5,000, or any integral multiple thereof, within a maturity.

Registration and Transfer – The Registrar may treat the registered owner of any Bond as the absolute owner of such Bond for the purpose of making payment thereof and for all other purposes and neither the District nor the Paying Agent and Registrar shall be bound by any notice or knowledge to the contrary, whether such Bond shall be overdue or not. All payments of or on account of interest to any registered owner of any Bond and all payments of or on account of principal to the registered owner of any Bond shall be valid and effectual and shall be a discharge of the District and the Paying Agent and Registrar, in respect of the liability upon the Bonds or claim for interest, as the case may be, to the extent of the sum or sums paid.

The District will cause the books for the registration and transfer of the Bonds to be kept at the office of the Paying Agent and Registrar at all times while any of such Bonds shall be outstanding. To the extent of denominations authorized for Bonds by the terms of the Resolution, one Bond may be transferred for several other Bonds of the same series, interest rate and maturity, and for a like aggregate principal amount and several such Bonds, of the same series may be transferred for one of several such Bonds, respectively, the same series, interest rate and maturity and for a like aggregate principal amount.

As a condition of any registration or transfer, the Registrar may at its option require the payment of a sum sufficient to reimburse it or the District for any tax or other governmental charge that may be imposed thereon, but no fee shall be charged for the registration of transfer or issuance.

The Registrar shall not be required to issue, transfer or exchange Bonds from any Record Date until the next Interest Payment Date.

SOURCES AND USES OF FUNDS

Sources:	
Principal Amount of Bonds	$435,000.00
Transfer from Prior Debt Service Funds	5,274.14
TOTAL	$440,274.14
Uses:	
Deposit to Current Refunding	$430,581.83
Costs of Issuance (including any underwriting discount, paying agent fees and rounding amount)	$9,692.34
TOTAL	$440,274.14

DEBT SERVICE REQUIREMENTS - PRINCIPAL AND INTEREST

Period Ending December 31	Total Principal	Total Interest	Total Principal & Interest
2021	$60,000	$367.32	$60,367.32
2022	70,000	2,225.00	72,225.00
2023	75,000	1,910.00	76,910.00
2024	75,000	1,497.50	76,497.50
2025	75,000	1,085.00	76,085.00
2026	80,000	560.00	80,560.00
Totals	$435,000	$7,644.82	$442,644.82

The underwriters are purchasing the bonds at a price of 98.35% plus accrued interest.

NEBRASKA DEVELOPMENTS RELATED TO BUDGETS AND TAXATION

General

The District's principal source of revenue for its general fund is local property taxes. Local property taxes constitute the District's largest revenue source but are subject to certain limitations as discussed below. The system of assessing and taxing personal property by the State of Nebraska (the "State") for purposes of local ad valorem taxation for support of local political subdivisions, including the District, has from time to time been the object of controversy, legal challenges, constitutional initiative petitions and legislative action.

Budget and Levy Limitations

The Nebraska Legislature (the "Legislature") has enacted legislation intended to reduce the level of expenditures and property taxes by political subdivision in the State. Sections 13-518 to 13-522, inclusive, Reissue Revised Statutes of Nebraska, as amended, and related sections (collectively, the "Budget Limitations"), limit the increase of certain restricted funds that may be budgeted by governmental units such as the District. Such restricted funds include property taxes, but exclude restricted funds pledged to retire bonded indebtedness. The Budget Limitations currently provide for a base limitation of 2.5% upon increases plus the percentage increase in the property tax provided by new construction, improvements to existing property, annexations and new personal property added to the property tax base. The base limitation is subject to review by the Legislature from year to year and may be exceeded by an additional 1% upon an affirmative vote of at least 75% of the governing body. The Budget Limitations are enforced through the office of the Auditor of Public Accounts of the State and State aid may be withheld from governmental units that fail to comply. Such budgetary limitations do not apply to, among other things, revenue pledged to retire bonded indebtedness, such as the Bonds.

The Legislature has also enacted Section 77-3442, Reissue Revised Statutes of Nebraska, as amended, and related sections (collectively, the "Levy Limitations"), to provide overall limitations on the property tax levies of political subdivisions, including the District. Under the Levy Limitations the rates for levying property taxes have been capped for each type of governmental unit in the State. The Act authorizes rural fire protection districts such as the District to levy not more than 10.5 cents per $100 of taxable valuation within such district to pay the principal of and the interest on its authority to all other political subdivisions not specifically covered in the Levy Limitations to levy taxes as authorized by law which do not collectively exceed 15 cents per $100 of taxable valuation of any parcel or item of taxable property. Because rural fire protection districts are not granted a specific limitation under the Levy Limitations, any levy certified by a rural fire protection district (except for levies (a) to pay judgment against an authority not covered by insurance, (b) for preexisting lease-purchase contracts approved prior to July 1, 1998, and (c) for bonded indebtedness approved according to law) would be subject to the approval by the county board of the county in which such district is located. However, because the Bonds have been approved according to law, any tax levied to pay the principal of and interest on the Bonds will not be subject to the Levy Limitations.

Additional Considerations

The future methods for providing for financing cities, fire protection districts and other local units may be altered depending upon future actions to be taken by voters of the State under initiative and referendum provisions of the Nebraska constitution, future actions of the Legislature and future decisions of the Nebraska state and federal courts.

TAX MATTERS

Federal Tax Matters

Tax Opinions. In the opinion of Rembolt Ludtke LLP, Bond Counsel, under existing laws, regulations, rulings and judicial decisions, interest on the Bonds is excludable from gross income for federal income tax purposes and is not a specific preference item for purposes of the federal alternative minimum tax. The opinion described in the preceding sentence assumes the accuracy of certain representations and compliance by the District with covenants designed to satisfy the requirements of the Code that must be met subsequent to the issuance of the Bonds. Failure to comply with such requirements could cause interest on the Bonds to be included in gross income for federal income tax purposes retroactive to the date of issuance of the Bonds. The District has covenanted to comply with such requirements. The accrual or receipt of interest on the Bonds may otherwise affect the federal income tax liability of the owners of the Bonds. The extent of these other tax consequences will depend upon such owner's particular tax status and other items of income or deduction. Bond Counsel has expressed no opinion regarding any such consequences. Purchasers of the Bonds, particularly purchasers that are corporations (including S corporations and foreign corporations operating branches in the United States), property or casualty insurance companies, banks, thrifts or other financial institutions, certain recipients of social security or railroad retirement benefits, taxpayers otherwise entitled to claim the earned income credit, or taxpayers who may be deemed to have incurred or continued indebtedness to purchase or carry tax-exempt obligations, should consult their tax advisors as to the tax consequences of purchasing or owning the Bonds.

Bank Qualified. The District has represented that it does not expect to issue greater than $10,000,000 of tax-exempt obligations during the calendar year in which the bonds are issued (excluding certain private activity and refunding bonds), and in the Resolution it has designated the Bonds as "qualified tax-exempt obligations" within the meaning of Section 265(b)(3) of the Code, as and to the extent the Bonds are not "deemed designated". Accordingly, Bond Counsel is of the opinion that in the case of certain banks, thrift institutions or other financial institutions owning the Bonds, a deduction is allowed for 80% of that portion of such institutions' interest expense allocable to interest on the Bonds. Bond Counsel has expressed no opinion with respect to any deduction for federal tax law purposes of interest on indebtedness incurred or continued by a holder of the Bonds or a related person to purchase or carry the Bonds.

Backup Withholding. As a result of the enactment of the Tax Increase Prevention and Reconciliation Act of 2005, interest on tax-exempt obligations such as the Bonds is subject to information reporting in a manner similar to interest paid on taxable obligations. Backup withholding may be imposed on payments made after March 31, 2007 to any bondholder who fails to provide certain required information including an accurate taxpayer identification number to any person required to collect such information pursuant to Section 6049 of the Code. The reporting requirement does not in and of itself affect or alter the excludability of interest on the Bonds from gross income for federal income tax purposes or any other federal tax consequence of purchasing, holding or selling tax-exempt obligations.

No Other Opinion. Bond Counsel has expressed no opinion regarding other federal tax consequences arising with respect to the Bonds.

State Tax Matters

In the opinion of Bond Counsel, under the existing laws of the State of Nebraska, the interest on the Bonds is exempt from Nebraska state income taxation so long as it is exempt for purposes of the federal income tax. Bond Counsel has expressed no opinion regarding other State tax consequences arising with respect to the Bonds.

Changes in Federal and State Tax Law

From time to time, there are legislative proposals in the Congress and in the states that, if enacted, could alter or amend the federal and state tax matters referred to above or adversely affect the market value of the Bonds. It cannot be predicted whether or in what form any such proposal might be enacted or whether if enacted it would apply to bonds issued prior to enactment. In addition, regulatory actions are from time to time announced or proposed and litigation is threatened or commenced which, if implemented or concluded in a particular manner, could adversely affect the market value of the Bonds. It cannot be predicted whether any such regulatory action will be implemented, how any particular litigation or judicial action will be resolved, or whether the Bonds or the market value thereof would be impacted thereby. Purchasers of the Bonds should consult their tax advisors regarding any pending or proposed legislation, regulatory initiatives or litigation. The opinions expressed by Bond Counsel are based upon existing legislation and regulations as interpreted by relevant judicial and regulatory authorities as of the date of issuance and delivery of the Bonds and Bond Counsel has expressed no opinion as of any date subsequent thereto or with respect to any pending legislation, regulatory initiatives or litigation.

BONDHOLDERS' RISKS

Prospective investors should carefully consider the risk factors set forth below and the other information included in this Offering Circular. The risks described below are not the only risks that the District faces and the following discussion of risk factors is not, and is not intended to be, exhaustive. Additional risks and uncertainties not currently known to the District or that it currently believes are immaterial may also impair its operations. Any of these risks may have a material adverse effect on the District's financial condition. Bondholders may lose all or part of their investment in the Bonds.

Absence of Credit Enhancement

No credit enhancement (such as bond insurance or a letter of credit) has been or will be obtained by the District in connection with the issuance of the Bonds. Prospective purchasers must look solely to the District and its levy of ad valorem taxes as described herein for repayment of the principal of the Bonds, any premium, and the interest thereon.

No Rating

The Bonds have not been rated or reviewed by any rating agency and it is not expected that any rating will be applied for. The absence of a rating may limit the market for reselling the Bonds because certain institutional and other investors limit their purchases to securities which have received a rating.

Lack of Market for the Bonds

The Bonds will not be listed on a securities exchange or inter-dealer quotation system. Although the Underwriter, as defined herein, presently intends to make a market for the Bonds, the Underwriter is not obligated to purchase any of the Bonds in the future, and such market making may be discontinued at any time. There can be no assurance that there will be a secondary market for the Bonds, and the absence of such a market for the Bonds could result in investors not being able to resell their Bonds should they need or wish to do so.

No Mortgage or Collateral

The Bonds are not secured by a mortgage, deed of trust or security interest in any real or personal property of the District, including the project originally financed with the proceeds of the Bonds. Accordingly, the Bondholders will not have any right to exercise any remedies against the project or other real or personal property of the District upon any event of a default with respect to the Bonds.

Limitation of Rights upon Insolvency

The United States Bankruptcy Code enables debtors, including municipalities, counties and school districts, which are insolvent to obtain relief through petition and plan which may result in the modification or delay of payments to creditors, including bondholders. Relief under Chapter 9 of the federal Bankruptcy Code is available only to those municipalities which are specifically authorized to be a debtor under such Chapter by state law or by a governmental officer or organization empowered by state law to authorize such entity to be a debtor under Chapter 9. The State of Nebraska has authorized its political subdivisions, including municipalities such as the District, to seek relief under the United States Bankruptcy Code by statute. Upon any insolvency upon the part of the District, the holders of the Bonds would represent general unsecured obligations of the District. The extent to which the exception from limitations upon overall tax rates provided for in existing legislation, including the provisions of "Budget Limitations" and "Levy Limitations" (as such terms are defined and described above under the heading "NEBRASKA DEVELOPMENTS RELATED TO BUDGETS AND TAXATION"), might entitle bondholders to be treated as a separate class or otherwise given priority over other unsecured claimants is a matter that would be subject to future determinations of Nebraska state and federal courts interpreting and applying both State law and the United States Bankruptcy Code. Procedures under the United States Bankruptcy Code or other insolvency laws could result in delays in payment and modifications of payment rights.

Redemption Prior to Maturity

In considering whether to make an investment in the Bonds, potential investors should consider the information included under the heading "THE BONDS—Redemption Provisions" herein. Upon any redemption of the Bonds, such called Bonds shall be redeemed at par and not with any premium. Investors purchasing Bonds at a discount or a premium should consult with their tax advisors regarding the effects of any such redemption at par.

Tax Treatment of the Bonds; Changes in Federal and State Law

The Internal Revenue Code of 1986, as amended (the "**Code**") establishes certain requirements that must be met subsequent to the issuance of the Bonds in order that interest thereon be and remain excludable from gross income for federal income tax purposes. Failure to comply with such requirements could cause the interest on the Bonds to be includable in gross income retroactive to the date of original issuance of the Bonds. In addition, from time to time, there are legislative proposals in the Congress and in the states that, if enacted, could alter or amend the federal and state tax status of the Bonds or adversely affect their market value. The District cannot predict whether or in what form any such proposal might be enacted or whether if enacted it would apply to bonds issued prior to enactment.

Nebraska Developments Related to Budgets and Taxation

From time to time the Nebraska Legislature has taken actions designed to reduce the reliance of local governmental units on property taxation. For a discussion of such changes, see "NEBRASKA DEVELOPMENTS RELATED TO BUDGETS AND TAXATION" herein.

Reduced State Revenues

The State, like many other states, has experienced decreased collections of revenues relating to general economic conditions as they impact enterprises throughout the State. Such decreased collections resulted in lower forecasts of revenues for the budgeting purposes of the State. In response to this change in revenue receipts and forecasts, the State Legislature increased certain taxes and has also enacted certain changes reducing State expenditures, including State appropriations and allocations to cities, counties, fire protection districts and other local units. Further consideration of decreased aid to local governments, including fire protection

districts, may occur in regular legislative sessions and, possibly, in one or more special sessions. Although revenue receipts and forecasts, as publicly reported, have recently improved, there can be no assurance concerning levels of expenditure by the State affecting fire protection districts.

No Official Statement

Because the par amount of the Bonds is less than $1,000,000, the Underwriter is not required to obtain and review an official statement and this Offering Circular is not a complete or final official statement of the District, as that term is defined by Securities Exchange Commission Rule 15c2-12 (the "Rule"). The information contained in this Offering Circular has been compiled or prepared from information obtained from the District and other sources deemed by the District to be reliable. The Underwriter has reviewed the information in this Offering Circular in accordance with, and as a part of, its responsibilities to investors under the federal securities laws as applied to the facts and circumstances of this transaction, but the Underwriter does not guarantee the accuracy or completeness of such information. Such information should not be construed as representing all of the conditions affecting the District or the Bonds. Any statements involving matters of opinion, whether or not expressly so stated, are intended as such and not as representations of fact

No Continuing Disclosure

The Bonds are not subject to the provisions of Rule 15c2-12 promulgated by the Securities and Exchange Commission regarding secondary market disclosure, and consequently, the District undertakes no obligation to provide secondary market information pursuant to such continuing disclosure standards with respect to the Bonds. The State Auditor of Public Accounts receives annual audited financial statements from all Nebraska subdivisions required to prepare and file such under current law. The State Auditor of Public Accounts makes such financial statements available to the public at its website http://www.auditors.state.ne.us.

Impact of the COVID-19 Virus

The District may experience disruptions related to the COVID-19 Virus pandemic and the national, state and local response. These disruptions include changes in the time and manner in which key services are offered by the District and the ability of District employees and volunteers to work on District matters and projects. To the extent the District relies upon aid and/or grants received from the state and federal government, such aid may be increased or decreased as a result of the response to the pandemic. The District does not currently anticipate any significant change in property tax receipts. The ultimate financial impact of the pandemic is uncertain and cannot be reasonably estimated at this point in time.

LEGAL OPINION

The approving opinion of Rembolt Ludtke LLP, Lincoln, Nebraska ("**Bond Counsel**") will affirm, among other things, that the Bonds have been authorized and issued in accordance with the Constitution and statutes of the State, that the Bonds constitute valid and legally binding obligations of the District, and that the District has power and is obligated to levy ad valorem taxes for the payment of the Bonds and the interest thereon upon all taxable property located in the District without limitation as to rate or amount. The rights of the holders of the Bonds and the enforceability thereof may be subject to valid bankruptcy, insolvency, reorganization, moratorium and other laws for the relief of debtors.

By rendering its legal opinion, Bond Counsel does not become an insurer or guarantor of that expression of professional judgment, of the transaction opined upon, or for the future performance of parties to the transaction, nor does the rendering of an opinion guarantee the outcome of any legal dispute that may arise out of the transaction. Bond Counsel has participated in the preparation of this Offering Circular but expresses no opinion as to the accuracy, completeness or sufficiency of the factual, operating and financial information appearing herein, which has been supplied and/or reviewed by certain officials of the District, excepting only matters relating to its opinion, including the matters appearing in the sections of this Offering Circular captioned "LEGAL OPINION" and "TAX MATTERS" herein. A draft of the legal opinion is available upon request from the Underwriter.

LITIGATION

As of the date of this Offering Circular there is, and as of the date of delivery of the Bonds there will be, no litigation, suit or other proceeding of any kind pending, or to the knowledge of the District threatened, (a) seeking to restrain or enjoin the issuance or delivery of the Bonds, or (b) contesting, disputing or affecting in any way (i) the legal organization of the District or its boundaries, (ii) the right or title of any of its officers to their respective offices, (iii) the legality of any of its official acts shown to have been done in the transcript relating to the Bonds, (iv) the constitutionality or validity of the Bonds or the indebtedness represented by the Bonds, or any of the proceedings had in relation to the authorization, issuance or sale thereof, (v) the legality, validity or enforceability of the Resolution or any related documents, (vi) the power or authority of the District to levy and collect ad valorem taxes as set forth in the Resolution to pay the principal of and interest on the Bonds, or (vii) the federal or State tax-exempt status of the interest on the Bonds, or (c) that

could have a material adverse effect on the financial condition or operations of the District or its ability to make payments on the Bonds or to perform its agreements and obligations under the Resolution or any related documents.

UNDERWRITING

First National Capital Markets, Inc., Omaha, Nebraska (the **"Underwriter"**), has agreed, subject to certain conditions, to purchase the Bonds from the District at a price equal to $427,822.50 (par, less an underwriting discount of $7,177.50), plus accrued interest, if any. The Underwriter will purchase all such Bonds if any such Bonds are purchased.

While the Underwriter expects, insofar as possible, to maintain a secondary market for the Bonds, no assurance can be given concerning the future maintenance of such a market by the Underwriter or others, and prospective purchasers of the Bonds should therefore be prepared to hold their Bonds to their maturity.

MISCELLANEOUS

All estimates and assumptions herein have been made on the basis of the best information available and are believed to be reliable, but no representations whatsoever are made that such estimates or assumptions are current or will be realized. So far as any statements herein involve matters of opinion, whether or not expressly stated, they are intended merely as such and not as representations of fact.

The Bonds are owned and offered for sale exclusively by

First National Capital Markets, Inc.

For additional information
Please contact your representative

First National
Capital Markets

4853-1834-7707, v. 1