2009 Annual Report

North Pullman
Redevelopment Project Area

Pursuant to 65 ILCS 5/11-74.4-5(d)

June 30, 2010
Ms. Christine Raguso  
Acting Commissioner  
Department of Community Development  
121 North LaSalle Street  
Chicago, Illinois 60602

Dear Commissioner:

Enclosed is the annual report for the North Pullman Redevelopment Project Area, which we compiled at the direction of the Department of Community Development pursuant to Section 5(d) of the Illinois Tax Increment Allocation Redevelopment Act (65 ILCS 5/11-74.6-1 et seq.), as amended. The contents are based on information provided to us by Chicago Departments of Community Development, Finance, and Law. We have not audited, verified, or applied agreed upon accounting and testing procedures to the data contained in this report. Therefore, we express no opinion on its accuracy or completeness.

It has been a pleasure to work with representatives from the Department of Community Development and other City Departments.

Very truly yours,

Ernst & Young LLP

Ernst & Young LLP
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June 30, 2010

The Honorable Daniel Hynes
Comptroller
State of Illinois
Office of the Comptroller
201 Capitol
Springfield, IL 62706

Dear Comptroller Hynes:

We have compiled the attached information for the North Pullman Redevelopment Project Area (Report) pursuant to 65 ILCS 5/11-74.4-5(d).

Sincerely,

Christine Raguso
Acting Commissioner
(1) DATE OF DESIGNATION AND TERMINATION - 65 ILCS 5/11-74.4-5(d)(1.5)

The Project Area was designated on June 30, 2009. The Project Area may be terminated no later than December 31, 2033.
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(2) AUDITED FINANCIALS - 65 ILCS 5/11-74.4-5(d)(2)

During 2009, no financial activity or cumulative deposits over $100,000 occurred in the Project Area. Therefore, no audited statements were prepared pertaining to the Special Tax Allocation Fund for the Project Area.
(3) MAYOR'S CERTIFICATION - 65 ILCS 5/11-74.4-5(d)(3)

Please see attached.
STATE OF ILLINOIS )
COUNTY OF COOK ) SS

CERTIFICATION

TO:

Daniel W. Hynes
Comptroller of the State of Illinois
James R. Thompson Center
100 West Randolph Street, Suite 15-500
Chicago, Illinois 60601
Attention: June Canello, Director of Local Government

Dolores Javier, Treasurer
City Colleges of Chicago
226 West Jackson Boulevard, Room 1125
Chicago, Illinois 60606

Maurice S. Jones
Director
Cook County Dept. Planning & Dev.
69 West Washington Street, Suite 2900
Chicago, Illinois 60602

Dan Donovan, Comptroller
Forest Preserve District of Cook County
69 W. Washington Street, Suite 2060
Chicago, IL 60602

Martin Koldyke, Chairman
Chicago School Finance Authority
135 South LaSalle Street, Suite 3800
Chicago, Illinois 60603

Timothy Mitchell, General Superintendent & CEO
Chicago Park District
541 North Fairbanks
Chicago, Illinois 60611

Ron Huberman
Chief Executive Officer
Chicago Board of Education
125 South Clark Street, 5th Floor
Chicago, Illinois 60603

Jacqueline Torres, Director of Finance
Metropolitan Water Reclamation District of Greater Chicago
100 East Erie Street, Room 2429
Chicago, Illinois 60611

Douglas Wright
South Cook County Mosquito Abatement District
155th & Dixie Highway
P.O. Box 1030
Harvey, Illinois 60426

I, RICHARD M. DALEY, in connection with the annual report (the “Report”) of information required by Section 11-74.4-5(d) of the Tax Increment Allocation Redevelopment Act, 65 ILCS5/11-74.4-1 et seq, (the “Act”) with regard to the North Pullman Redevelopment Project Area (the “Redevelopment Project Area”), do hereby certify as follows:
1. I am the duly qualified and acting Mayor of the City of Chicago, Illinois (the “City”) and, as such, I am the City’s Chief Executive Officer. This Certification is being given by me in such capacity.

2. During the preceding fiscal year of the City, being January 1 through December 31, 2009, the City complied, in all material respects, with the requirements of the Act, as applicable from time to time, regarding the Redevelopment Project Area.

3. In giving this Certification, I have relied on the opinion of the Corporation Counsel of the City furnished in connection with the Report.

4. This Certification may be relied upon only by the addressees hereof.

IN WITNESS WHEREOF, I have hereunto affixed my official signature as of this 30th day of June, 2010.

Richard M. Daley, Mayor
City of Chicago, Illinois
(4) **OPINION OF LEGAL COUNSEL - 65 ILCS 5/11-74.4-5(d)(4)**

Please see attached.
June 30, 2010

Daniel W. Hynes  
Comptroller of the State of Illinois  
James R. Thompson Center  
100 West Randolph Street, Suite 15-500  
Chicago, Illinois 60601  
Attention: June Canello, Director of Local Government

Dolores Javier, Treasurer  
City Colleges of Chicago  
226 West Jackson Boulevard, Room 1125  
Chicago, Illinois 60606

Maurice S. Jones  
Director  
Cook County Dept. Planning & Dev.  
69 West Washington Street, Suite 2900  
Chicago, Illinois 60602

Dan Donovan, Comptroller  
Forest Preserve District of Cook County  
69 W. Washington Street, Suite 2060  
Chicago, IL 60602

Martin Koldyke, Chairman  
Chicago School Finance Authority  
135 South LaSalle Street, Suite 3800  
Chicago, Illinois 60603

Re: North Pullman  
Redevelopment Project Area (the “Redevelopment Project Area”)

Dear Addressees:

I am Corporation Counsel of the City of Chicago, Illinois (the “City”). In such capacity, I am providing the opinion required by Section 11-74.4-5(d)(4) of the Tax Increment Allocation Redevelopment Act, 65 ILCS 5/11-74.4-1 et seq. (the “Act”), in connection with the submission of the report (the “Report”) in accordance with, and containing the information required by, Section 11-74.4-5(d) of the Act for the Redevelopment Project Area.
Attorneys, past and present, in the Law Department of the City familiar with the requirements of the Act have had general involvement in the proceedings affecting the Redevelopment Project Area, including the preparation of ordinances adopted by the City Council of the City with respect to the following matters: approval of the redevelopment plan and project for the Redevelopment Project Area, designation of the Redevelopment Project Area as a redevelopment project area and adoption of tax increment allocation financing for the Redevelopment Project Area, all in accordance with the then applicable provisions of the Act. Various departments of the City, including, if applicable, the Law Department, Department of Planning and Development, Department of Housing, Department of Finance and Office of Budget and Management, have personnel responsible for and familiar with the activities in the Redevelopment Project Area affecting such Department(s) and with the requirements of the Act in connection therewith. Such personnel are encouraged to seek and obtain, and do seek and obtain, the legal guidance of the Law Department with respect to issues that may arise from time to time regarding the requirements of, and compliance with, the Act.

In my capacity as Corporation Counsel, I have relied on the general knowledge and actions of the appropriately designated and trained staff of the Law Department and other applicable City Departments involved with the activities affecting the Redevelopment Project Area. In addition, I have caused to be examined or reviewed by members of the Law Department of the City the certified audit report, to the extent required to be obtained by Section 11-74.4-5(d)(9) of the Act and submitted as part of the Report, which is required to review compliance with the Act in certain respects, to determine if such audit report contains information that might affect my opinion. I have also caused to be examined or reviewed such other documents and records as were deemed necessary to enable me to render this opinion. Nothing has come to my attention that would result in my need to qualify the opinion hereinafter expressed, subject to the limitations hereinafter set forth, unless and except to the extent set forth in an Exception Schedule attached hereto as Schedule 1.

Based on the foregoing, I am of the opinion that, in all material respects, the City is in compliance with the provisions and requirements of the Act in effect and then applicable at the time actions were taken from time to time with respect to the Redevelopment Project Area.

This opinion is given in an official capacity and not personally and no personal liability shall derive herefrom. Furthermore, the only opinion that is expressed is the opinion specifically set forth herein, and no opinion is implied or should be inferred as to any other matter. Further, this opinion may be relied upon only by the addressees hereof and the Mayor of the City in providing his required certification in connection with the Report, and not by any other party.

Very truly yours,

Mara S. Georges
Corporation Counsel
(X) No Exceptions

( ) Note the following Exceptions:
Note

Reference is made in the first paragraph of Page 2 of the Opinion of Counsel for 2009 Annual Report to the Department of Planning and Development and the Department of Housing. The functions of both of these departments have been consolidated into the Department of Community Development.
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(5) ANALYSIS OF SPECIAL TAX ALLOCATION FUND - 65 ILCS 5/11-74.4-5(d)(5)

During 2009, there was no financial activity in the Special Tax Allocation Fund.
(6) DESCRIPTION OF PROPERTY - 65 ILCS 5/11-74.4-5(d)(6)

During 2009, the City did not purchase any property in the Project Area.
(7) STATEMENT OF ACTIVITIES - 65 ILCS 5/11-74.4-5(d)(7)

(A) Projects implemented in the preceding fiscal year.
(B) A description of the redevelopment activities undertaken.
(C) Agreements entered into by the City with regard to disposition or redevelopment of any property within the Project Area.
(D) Additional information on the use of all Funds received by the Project Area and steps taken by the City to achieve the objectives of the Redevelopment Plan.
(E) Information on contracts that the City's consultants have entered into with parties that have received, or are receiving, payments financed by tax increment revenues produced by the Project Area.
(F) Joint Review Board reports submitted to the City.
(G) Project-by-project review of public and private investment undertaken from 11/1/99 to 12/31/09, and of such investments expected to be undertaken in year 2010; also, a project-by-project ratio of private investment to public investment from 11/1/99 to 12/31/09, and an estimated ratio of such investments as of the completion of each project and as estimated to the completion of the redevelopment project.

SEE TABLES AND/OR DISCUSSIONS ON FOLLOWING PAGES.
(7)(A) - 65 ILCS 5/11-74.4-5(d)(7)(A)

During 2009, no projects were implemented.

(7)(B) - 65 ILCS 5/11-74.4-5(d)(7)(B)

Redevelopment activities undertaken within this Project Area during the year 2009, if any, have been made pursuant to i) the Redevelopment Plan for the Project Area, and ii) any Redevelopment Agreements affecting the Project Area, and are set forth on Table 5 herein by TIF-eligible expenditure category.

(7)(C) - 65 ILCS 5/11-74.4-5(d)(7)(C)

During 2009, no agreements were entered into with regard to the disposition or redevelopment of any property within the Project Area.
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(7)(D) - 65 ILCS 5/11-74.4-5(d)(7)(D)

The Project Area has not yet received any increment.

(7)(E) - 65 ILCS 5/11-74.4-5(d)(7)(E)

During 2009, no contracts were entered into by the City's tax increment advisors or consultants with entities or persons that have received, or are receiving, payments financed by tax increment revenues produced by the Project Area.
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(7)(F) - 65 ILCS 5/11-74.4-5(d)(7)(F)

Joint Review Board Reports were submitted to the City. See attached.

(7)(G) - 65 ILCS 5/11-74.4-5(d)(7)(G)

Since November 1, 1999, no public investment was undertaken in the Project Area. As of December 31, 2009, no public investment is estimated to be undertaken for 2010.
CITY OF CHICAGO
JOINT REVIEW BOARD

ORIGINAL

Report of proceedings of a hearing
before the City of Chicago, Joint Review
Board held on April 3, 2009, at 10:16 a.m.
City Hall, Room 1003, Conference Room,
Chicago, Illinois, and presided over by
Ms. Tanya Anthony.

PRESENT:

MS. TANYA ANTHONY, CHAIRMAN
MS. GLORIA PERALTA
MS. SUSAN MAREK
MR. JOHN SCHNEIDER
MS. ANTHONY: Okay, we're going to begin the North Pullman Joint Review Board Meeting. Again, I'll ask everyone to just briefly, quickly introduce yourselves.

MS. PERALTA: Gloria Peralta, with the City Finance Department.

MS. MAREK: Susan Marek, Board of
MR. SCHNEIDER: John Schneider, Department of Planning and Development, Cook County.

MS. ANTHONY: Sir, can you state your name, please?

MR. STEVENS: Oh, Ernest Stevens.

MS. ANTHONY: Ernest Stevens, thank you. And, for the record, my name is Tanya Anthony, I'm the representative of the Chicago Park District, which under Section 1174.45 of the Tax Increment Allocation Redevelopment Act, is one of the statutorily designated members of the Joint Review Board. Until election of a chairperson, I will moderate the Joint Review Board meeting.

For the record, this meeting of the Joint Review Board is to review the proposed North Pullman Tax Increment Financing District. The date of this meeting was announced at and set by the Community Development Commission of the City of Chicago, at its meeting of March 10th, 2009.
Notice of this meeting of the Joint Review Board was also provided by certified mail to each taxing district represented on the Board, which includes the Chicago Board of Education, the Chicago Community Colleges, District 508, the Chicago Park District, Cook County, and the City of Chicago. Public Notice of this meeting was also posted on Wednesday, April 1st, 2009 in various locations throughout City Hall.

When a proposed redevelopment plan would result in displacement of residents from ten or more inhabited residential units, or would include 75 or more inhabited residential units, the TIF Act requires that the public member of the Joint Review Board must reside in the proposed redevelopment project area.

In addition, if a municipality's housing impact study determines that the majority of residential units in the proposed redevelopment project area are occupied by very low, low, or moderate income...
households, as defined in Section 3 of the Illinois Affordable Housing Act, the public member must be a person who resides in a very low, low, or moderate income housing within the proposed redevelopment project area.

With us today is Ernest Stevens. Mr. Stevens, are you familiar with the boundaries of the proposed North Pullman Tax Increment Financing Redevelopment Project Area?

MR. STEVENS: Yes.

MS. ANTHONY: What is the address of your primary residence?

MR. STEVENS: 657 East 105th Street.

MS. ANTHONY: Is such address within the boundaries of the proposed North Pullman Tax Increment Financing Redevelopment Project Area?

MR. STEVENS: Yes.

MS. ANTHONY: Have you provided representatives of the City of Chicago's Department of Community Development with accurate information concerning your income and the income of any other members of the
1 household residing at such address?
2 MR. GROSZEK: Yes.
3 MS. ANTHONY: Mr. Stevens, are you
4 willing to serve as the public member for the
5 Joint Review Board for the proposed North
6 Pullman Tax Increment Finance Redevelopment
7 Project Area.
8 MR. GROSZEK: Yes.
9 MS. ANTHONY: I will entertain a
10 motion that Ernest Stevens be selected as the
11 public member. Is there a motion?
12 MS. MAREK: So moved.
13 MS. ANTHONY: Is there a second?
14 MS. PERALTA: Second.
15 MS. ANTHONY: All in favor please
16 vote by saying aye.
17 (Chorus of ayes.)
18 MS. ANTHONY: All opposed please vote
19 by saying no.
20 Let the record reflect that
21 Ernest Stevens has been selected as the
22 public member for the proposed North Pullman
23 Tax Increment Financing Redevelopment
24 Project Area.
Our next order of business is to select a chairperson for this Joint Review Board. Are there any nominations?

MS. MAREK: I'll nominate Tanya Anthony.

MS. ANTHONY: Is there a second for the nomination?

MR. SCHNEIDER: I'll second.

MS. ANTHONY: Are there any other nominations?

Let the record reflect there were no other nominations.

All in favor of the nomination please vote by saying aye.

(Chorus of ayes.)

MS. ANTHONY: All opposed please vote by saying no.

Let the record reflect that Tanya Anthony has been elected as chairperson and will now serve as the chairperson for the remainder of this meeting.

As I mentioned, at this meeting we will be reviewing a plan for the proposed North Pullman Tax Increment Financing.
District proposed by the City of Chicago.

Staff of the City’s Departments of Community Development and Law, and other departments, have reviewed this plan which was introduced to the City’s Community Development Commission on March 10th, 2009.

We will listen to a presentation by the consultant on this plan. Following the presentation we can address any questions that the members might have for the consultant or City Staff.

An amendment to the TIF Act requires us to base recommendation to approve or disapprove the proposed North Pullman Tax Increment Financing District on the basis of the area and the plan satisfying the plan requirements, the eligibility criteria defined in the TIF Act, and objectives of the TIF Act.

If the Board approves the plan, the Board will then issue an advisory, non-binding recommendation by the vote of the majority of those members present and voting. Such recommendation shall be
submitted to the City within 30 days after
the Board meeting. Failure to submit such
recommendation shall be deemed to constitute
approval by the Board.

If the Board disapproves the
plan, the Board must issue a written report
describing why the plan and area failed to
meet one or more of the objectives of the TIF
Act, and both the plan requirements and the
eligibility criteria of the TIF Act. The
City will also then have 30 days to resubmit
a revised plan. The Board and the City must
also confer during this time to try to
resolve the issues that led to the Board's
disapproval. If such issues cannot be
resolved, or of the revised plan is
disapproved, the City may proceed with the
plan but the plan can be approved only with
three-fifths vote of the City counsel,
excluding positions of members that are
vacant and those members that are ineligible
to vote because of conflict of interest.

At this time we'll have a
presentation on the proposed North Pullman
TIF area.

MR. BARBARO: Good morning everyone, my name is Carmelo Barbaro, I'm with S.B. Friedman and Company. S.B. Friedman and Company is a consulting firm that was contracted to determine whether or not the proposed North Pullman RPA is eligible for TIF designation under state law.

The area proposed to be included in the North Pullman RPA is roughly bounded by an alley running north of 103rd Street on the north, 111th Street on the south, Indiana Avenue on the west and Interstate 94 on the east. This area includes a North Pullman residential neighborhood, it includes several vacant formerly industrial sites, including the Ryerson Steel campus, and includes the 103rd Street commercial corridor. Existing land use within the area is mixed with residential, industrial, commercial and public uses. It contains 292 buildings and 807 tax parcels.

To determine whether or not the North Pullman study area qualified for TIF
designation, S.B. Friedman and Company went into the field and surveyed every building and property, and assessed the conditions of those properties and public infrastructure, in addition we collected data from the city and county on the condition of underground utilities, and on the histories of assessed values.

Based on this research, we found that the area qualifies as a conservation, as an improved conservation area under the law, because more than 50 percent of buildings within the area are 35 years of age or older, and five of a possible 13 factors are present to a major extent, and reasonably distributed throughout the RPA.

These five factors include a lack of growth in equalized assessed value, the BAV of the RPA grew less quickly than the balance of the city during three of the previous five years, deterioration of both buildings and infrastructure which affected nearly all properties within the TIF, inadequate utilities due to the age and
antiquated nature of the water and sewer lines in the study area, environmental contamination which affected two of the larger formerly industrial sites within the study area, and excessive vacancies which affected not only a number of residential blocks, but also the Ryerson Steel campus. In addition, three factors were found to be present to a minor degree within the RPA.

The overall goal of the redevelopment plan for the North Pullman RPA is to reduce or eliminate the conditions that qualified the RPA as a conservation area. The city has outlined 15 broad objectives to support the overall goal of revitalization of the North Pullman RPA, these include providing resources for the rehabilitation and modernization of existing structures, particularly those included within the North Pullman historic district, facilitating residential development and redevelopment that will accommodate current and future residents, facilitating redevelopment of vacant and underutilized industrial
properties such as the Ryerson Steel Campus, providing resources for environmental remediation, and providing resources for the creation and improvement of community facilities that offer help, wellness, education, social support and job training for RPA residents.

The City is required in the act to evaluate whether or not the RPA has been subject to growth and private investment, and will substantiate a finding of lack of such investment prior to establishing a TIF district. As discussed, the equalized assessed value of the North Pullman RPA has not kept pace with the balance of the city for three of the previous five years.

In addition, S.B. Friedman and Company examined building permit records in the RPA. The value of building permits issued within the North Pullman RPA between January, 2002 and January, 2009, a seven year period, totaled approximately $8.3 million. This rate of investment is very low when compared to the overall value of property
within the TIF district. It is insufficient to achieve redevelopment goals and objectives described above. In addition, a large proportion of construction activity within the RPA has been driven by the public and non-profit sectors, further demonstrating a lack of growth through private investment.

The proposed future land use within the RPA is substantially similar to the existing land uses within the RPA. The primary difference actually relates to the now vacant industrial properties in the eastern portion of the RPA, where a mix of residential, commercial, public and institutional uses is contemplated.

The total budget for the redevelopment plan is currently estimated to be $98 million over 23 years.

In addition, a housing impact study was undertaken for the North Pullman RPA as the district included more than 75 residential units. We completed a survey of all residential properties within the
district on December 18th, 2008, and
identified 229 residential buildings and 903
residential units, 798 of which were
occupied. It’s estimated that 82 percent of
residents within the district are low, very
low or very, very low income, and that’s
based on projections from the 2000 census.
S.B. Friedman and Company also
examined the likely displacement which might
occur over the 23 year life of the TIF
district. We examined any acquisition maps
which were contemplated, which in fact there
are none, dilapidated but occupied
residential units, any units located in
areas where a change in land use was
contemplated. Overall 14 units, occupied
residential units total could be displaced
over the 23 year life of the TIF, by the
findings of the housing impact study.

Does anyone have any questions?

MS. MAREK: When you said there were
excessive vacancies, was that as part of the
residential area as well as the other uses?

MR. BARBARO: It affected both, some
of the residential blocks, I mean, obviously there's some very large vacant industrials out here which comprises a significant proportion of the area, but there are also several blocks, particularly along 90 and Maryland, within the historic district, which have substantial vacancies, a number of boarded up buildings --

MR. SCHNEIDER: Is this a developer, do you have a developer for any of this? Basically is there a plan for what's taking place here?

MR. BARBARO: There is redevelopment contemplated for, for the Ryerson Steel campus and a developer has been identified.

MR. SCHNEIDER: Okay.

MR. BARBARO: And that obviously is driving that, part of that $98 million number.

MR. SCHNEIDER: Which is a very positive thing. I also want to compliment you on the maps.
MR. BARBARO: Thank you.

MR. SCHNEIDER: I think the maps are, in the six months that I’ve been coming here probably the best I’ve seen, which makes it very easy to understand.

MR. BARBARO: Thank you, sir.

MS. ANTHONY: Can you explain the environmental contamination issue?

MR. BARBARO: Yeah, there were, there were, I think there were three sites total where some form of environmental contamination was identified. There was one site in the 103rd Street corridor where there was a leaking underground storage tank incident. The other sites are actually formerly industrial sites, the Union Foundry Site, which is currently totally overgrown with trees, it does have some environmental contamination, and also the Ryerson Steel site. And so, remedying this contamination before this property’s ever developed is part of what would be contemplated under the TIF.

MS. ANTHONY: Okay. Any other
questions? Okay, so based on the presentation, if there are no other questions, I will entertain a motion that this Joint Review Board finds that the proposed North Pullman Project Area satisfies the redevelopment plan requirements under the TIF Act, the eligibility criteria defined in the TIF Act, and the objectives of the TIF Act, and that based on such findings, approve such proposed plan under the TIF Act. Is there a motion?

MS. MAREK: So moved.

MS. ANTHONY: Is there a second for the motion?

MR. SCHNEIDER: Second.

MS. ANTHONY: Is there any further discussion? If not, all in favor vote by saying aye.

(Chorus of ayes.)

All opposed please vote by saying no. Let the record reflect that the Joint Review Board's approval of the proposed North Pullman under the TIF Act. This
meeting is adjourned.

(Whereupon the meeting adjourned at 11:00 a.m.)
STATE OF ILLINOIS )
COUNTY OF COOK )

I, CAROL ROBERTSON, depose and say that I am a direct record court reporter doing business in the State of Illinois; that I reported verbatim the foregoing proceedings and that the foregoing is a true and correct transcript to the best of my knowledge and ability.

Carol Robertson

CAROL ROBERTSON

SUBSCRIBED AND SWORN TO BEFORE ME THIS 15th DAY OF

April, A.D. 2009.

NOTARY PUBLIC
(8) DOCUMENTS RELATING TO OBLIGATIONS ISSUED BY THE MUNICIPALITY - 65 ILCS 5/11-74.4-5(d)(8)(A)

During 2009, there were no obligations issued for the Project Area.
(9) ANALYSIS OF DEBT SERVICE - 65 ILCS 5/11-74.4-5(d)(8)(B)

During 2009, there were no obligations issued for the Project Area.
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(10)  CERTIFIED AUDIT REPORTS - 65 ILCS 5/11-74.4-5(d)(9)

During 2009, there were no tax increment expenditures or cumulative deposits over $100,000 within the Project Area. Therefore, no compliance statement was prepared.
(11) **GENERAL DESCRIPTION AND MAP**

The North Pullman Redevelopment Project Area is generally bounded by S. Doty and S. Stony Island Avenues on the east; E. 106th, E. 108th and E. 111th Streets on the south; S. Cottage Grove and S. Indiana Avenues to the west; and E. 101st and E. 103rd Streets on the north. The map below illustrates the location and general boundaries of the Project Area. For precise boundaries, please consult the legal description in the Redevelopment Plan.