

DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE WASHINGTON, DC 20224

TE/GE

Date: APR 1 8 2013

Contact Person:

Tom Chen

Employee ID Number:

0235788

Contact Telephone Number:

(562) 491-7726

Contact Address:

501 W. Ocean Blvd. Long Beach, CA 90802

Re: Notification of No-Change Determination

Certificates of Participation (Tucson Convention Center Project)

Series 2002

Timothy A. Stratton

Phoenix, AZ 85004-2553

1 E. Washington Street, Suite 1600

Dear Mr. Stratton:

We are sending you the enclosed material under the provisions of your power of attorney or other authorization on file with us. For your convenience, we have listed the name of the taxpayer to whom this material relates.

If you have any questions, please call the contact person at the telephone number shown in the heading of this letter.

Thank you for your cooperation.

Sincerely,

Tom Chen

Revenue Agent

Enclosure:

✓ Letter✓ Report✓ Other

Taxpayer's name: Rio Nuevo Multipurpose Facilities District



DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE WASHINGTON, DC 20224

Rio Nuevo Multipurpose Facilities District Attn: William A. Allen, CFO 400 West Congress, Suite 1600 Phoenix, AZ 85004-2553

Date: APR 1 8 2013

Contact Person: Tom Chen **Employee ID Number:** 0235788

Contact Telephone Number:

562-491-7726 **Contact Address:**

Internal Revenue Service 501 W. Ocean Blvd., 2nd Floor Long Beach, CA 90802 **Employer Identification Number** 86-1019362

Re: Notification of No-Change Determination Certificates of Participation (Tucson Convention Center Project), Series 2002.

Dear Mr. Allen,

We have recently completed our examination of the bond issue named above (the "Bonds"). As a result, we have made a determination to close the examination with nochange to the position that interest received by the beneficial owners of the Bonds is excludable from gross income under section 103 of the Internal Revenue Code.

Please note, if the need arises to open another examination of the Bonds, any change resulting from the future examination may affect all open years of the beneficial owners of the Bonds.

If you have any questions concerning this matter, please contact the person whose name and telephone number are shown in this letter.

Thank you for your cooperation in this matter.

Sincerely,

Allyson D. Belsome

Manager, Tax-Exempt Bonds

Field Operations