

**BATAVIA DEVELOPMENT CORPORATION  
ONE CITY CENTRE  
BATAVIA, NEW YORK 14020**

June 25, 2020

Freed Maxick CPAs, P.C.  
One Evans Street  
Batavia, New York 14020

In connection with your examination of the Batavia Development Corporation's (the Corporation), compliance with the New York State Comptroller's Investment Guidelines for Public Authorities and Section 2925 of the New York State Public Authorities Law (collectively, the "Investment Guidelines") during the period of April 1, 2019 through March 31, 2020 in accordance with standards established by the American Institute of Certified Public Accountants, we confirm to the best of our knowledge and belief, the following representations made to you during the course of your engagement:

1. We are responsible for the Corporation's compliance with the Investment Guidelines.
2. We are responsible for establishing and maintaining effective internal control over the Corporation's compliance with the Investment Guidelines.
3. We have performed an evaluation of the Corporation's compliance with the Investment Guidelines. Based on our evaluation, the Corporation has complied with the Investment Guidelines during the period April 1, 2019 through March 31, 2020 based on the criteria referred to under New York State Comptroller's Investment Guidelines for Public Authorities and Section 2925 of the New York State Public Authorities Law.
4. There has been no known noncompliance with the Investment Guidelines during the period April 1, 2019 through March 31, 2020 or through the date of this letter.
5. There are no known communications from regulatory agencies, internal auditors, or other practitioners concerning the Corporation's possible noncompliance with the Investment Guidelines received by us during the period April 1, 2019 through March 31, 2020 or through the date of this letter.
6. We have made available to you all documentation related to the Corporation's compliance with the Investment Guidelines.
7. There has been no knowledge of fraud or suspected fraud affecting the entity involving:
  - a. Management.
  - b. Employees who have significant roles in the internal control.
  - c. Others where fraud could have a material effect on the Corporation's compliance with the Investment Guidelines.
8. We acknowledge our responsibility for the design and implementation of programs and controls to provide reasonable assurance that fraud is prevented and detected.
9. We have no knowledge of any allegations of fraud or suspected fraud affecting the Corporation received in communications from employees, former employees, analysts, regulators, short sellers, or others.
10. We have responded fully to all inquiries made to us by you during your engagement.

11. During the course of your engagement you may have accumulated records containing data which should be reflected in our books and records. All such data have been so reflected. Accordingly, copies of such records in your possession are no longer needed by us.

**Batavia Development Corporation**

  
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Signature

DIRECTOR OF ECONOMIC DEVELOPMENT  
Title

**INDEPENDENT ACCOUNTANT'S REPORT**

To the Board of Directors of the  
Batavia Development Corporation  
Batavia, New York

We have examined Batavia Development Corporation's (the Corporation) compliance with the New York State Comptroller's Investment Guidelines for Public Authorities and Section 2925 of the New York State Public Authorities Law (collectively, the "Investment Guidelines") during the period April 1, 2019, to March 31, 2020. Management of the Corporation is responsible for the Corporation's compliance with the specified requirements. Our responsibility is to express an opinion on the Corporation's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Corporation complied, in all material respects, with the specified requirements referenced above. An examination involves performing procedures to obtain evidence about whether the Corporation complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including as assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination does not provide a legal determination on the Corporation's compliance with specified requirements.

In our opinion, the Corporation complied, in all material respects, with the Investment Guidelines during the period April 1, 2019 to March 31, 2020.

This report is intended solely for the information and use of the Board of Directors, management and others within the Corporation and the New York State Authorities Budget Office, and is not intended to be and should not be used by anyone other than these specified parties.

*Freed Maxick CPAs, P.C.*

Batavia, New York  
June 25, 2020