

**City of South Bend, Indiana**  
**Bond Continuing Disclosure Procedure**  
**Adopted – January 1, 2015, Revised March 9, 2015**

The City of South Bend (City) will comply fully with Rule 15c2-12 of the Securities and Exchange Act of 1934 and will make sure that required financial/operating information and event filings are published on the Electronic Municipal Market Access (EMMA) in a timely manner. The EMMA website is located at [emma.msrb.org](http://emma.msrb.org). The City Controller and Deputy City Controller will be responsible for implementing this procedure.

**Financial/Operating Information Filings**

- **Annual Financial Report (formerly known as the City and Town Annual Report)** – is prepared annually by the City by March 1<sup>st</sup>. This report will be published within 180 days of December 31<sup>st</sup>.
- **Operating Data** – is prepared annually by the City and financial advisor and will be published by the City within 180 days of December 31<sup>st</sup>. Operating data will also be included in the statistical section of the City's Comprehensive Annual Financial Report (CAFR) and will include the following:
  1. Description of the City of South Bend and the South Bend Redevelopment District
  2. Population
  3. Employment
  4. Average Annual Employment Rate
  5. Employment by Industry
  6. Major Employers
  7. Taxes
  8. Community Data
  9. Transportation
  10. Utilities
  11. Education
  12. Building Permits
  13. Financial Institutions
  14. Direct and Overlapping Debt for the City of South Bend
  15. Direct and Overlapping Debt for the South Bend Redevelopment District
  16. CEDIT Revenue Bonds
  17. COIT Revenue Bonds
  18. Direct Debt Issuance Limitation for the City of South Bend
  19. Direct Debt Issuance Limitation for the South Bend Redevelopment District
  20. Per Capita and Debt Ratio Analysis for the South Bend Redevelopment District
  21. Hotel-Motel Tax Revenue Debt
  22. Tax Increment (TIF) Revenue Debt
  23. Statement of City-Owned Utility Debt

24. Comparative Schedule of Tax Rates
25. Schedule of Historical Net Assessed Valuation – City of South Bend
26. Schedule of Historical Net Assessed Valuation – Saint Joseph County
27. Detail of Net Assessed Valuation
28. Property Taxes Levied and Collected
29. Principal Taxpayers
30. Summary of Revenues and Expenditures by Fund
31. Historical Tax Increment Property Tax Collections
32. Estimated Tax Increment Revenue Erskine Village Project
33. Annual Waterworks Flow Data
34. Number of Waterworks Customers
35. Ten Largest Waterworks Customers
36. Waterworks Balance Sheet
37. Waterworks Income Statement
38. Estimated Debt Service Coverage Calculation – Water Utility
39. Schedule of Current Utility Rates and Charges
40. Annual Wastewater Flow Data – Sewage Works
41. Ten Largest Sewage Works Customers
42. Number of Customers – Sewage Works
43. Sewage Works Balance Sheet
44. Sewage Works Income Statement
45. Estimated Debt Service Coverage Calculation – Sewage Works
46. Schedule of Revenue Bond Coverage – Water Utility Bonds
47. Schedule of Revenue Bond Coverage – Wastewater Utility Bonds
48. Projected County Option Income Tax (COIT) Revenue
49. Statement of Estimated COIT Cash Flow and Debt Service Coverage – South Bend Building Corporation
50. Estimated Tax Increment Revenue – Erskine Village Project
51. City of South Bend Balance Sheet
52. City of South Bend Income Statement

- **Comprehensive Annual Financial Report (CAFR)** – is prepared by the City, State Board of Accounts, and/or external auditors on an annual basis. The CAFR will be published within sixty (60) days of receipt from the State Board of Accounts or external auditor.
- **Voluntary Financial Report Filings**
  1. **Board of Finance Investment Report** – is prepared annually by the City during January and will be published within thirty (30) days of completion.
  2. **Adopted Budget** – is prepared by the City annually in October and will be published within thirty (30) days of approval by the Common Council and Mayor.

3. **Departmental Financial Report** – is prepared monthly by the City and will be published within thirty (30) days after the end of each month.
4. **Financial Report** – is prepared monthly by the City and will be published within thirty (30) days after the end of each month.
5. **Controller's Cash Report** – is prepared monthly by the City and will be published within thirty (30) days after the end of each month.
6. **Property Tax Revenue Report** – is prepared annually by the City and will be published within thirty (30) days of year end.
7. **Local Option Income Tax Revenue Report** – is prepared annually by the City and will be published within thirty (30) days of year end.
8. **Mayor's Annual Financial Report to the Common Council** – is prepared annually by the City and will be published within sixty (60) days of year end.
9. **Other Financial Reports** – other internal and external financial reports will be published during the year as appropriate.

#### **Event Filings**

- Material event filings will be published by the City, financial advisor, paying agent or other interested party within ten (10) business days of their occurrence. Some examples of event filings that may be published:
  1. Principal and interest payment delinquencies;
  2. Non-payment related defaults, if material;
  3. Unscheduled draws on debt service reserves;
  4. Unscheduled draws on credit enhancements;
  5. Substitution of credit or liquidity providers, or their failure to perform;
  6. Adverse tax opinions and notices from the IRS;
  7. Modifications to rights of security holders, if material;
  8. Bond calls, if material, and tender offers;
  9. Defeasances;
  10. Release, substitution, or sale of property securing repayment of the securities, if material;
  11. Rating changes;
  12. Bankruptcy, insolvency, receivership or similar event of the obligated person or issuer;
  13. Merger, consolidation, or acquisition of an obligated person or issuer;
  14. Appointment of a successor or additional trustee;
  15. Failure of an issuer or obligated person to provide annual financial information as required.

### Failure to Disclose

- The City will publish a Failure to Disclose notice within five (5) business days if it is unable to provide the annual financial information as described above.

### CUSIP Numbers

- The City will link the financial/operating and event filings to specific CUSIP numbers being utilized by the City of South Bend and related entities. The financial advisor will review annually that the proper CUSIP numbers are being used and the current CUSIP numbers are as follows:
  1. #836480 – South Bend Building Corporation
  2. #836482 – South Bend Building Corporation County Option Income Tax Lease Rental Revenue
  3. #836518 – South Bend County Economic Development Income Tax Revenue
  4. #836520 – South Bend Economic Development Revenue
  5. #836562 – South Bend Redevelopment Authority Lease Revenue
  6. #836615 – South Bend Sewage Works Revenue
  7. #836632 – South Bend Water Works Revenue
  8. #836565 – South Bend Redevelopment District
  9. #836568 – South Bend Redevelopment District
  10. #836570 – South Bend Redevelopment District Tax Increment Financing (refunded)
  11. #836481 – South Bend Building Corporation First Mortgage Bond (refunded)

### MyEmma Saved Searches

- The City has established the following groups in the “MyEmma Saved Searches” section of the EMMA website to monitor if financial/operating and event disclosures are being made in a timely manner and linked properly to necessary bond issuances. The City Controller, Deputy City Controller and financial advisor will review the disclosures contained in these searches on a quarterly basis to make sure that they are timely and proper. Any discrepancies will be reported to the City Controller. The names for the saved searches are as follows:

1. SB Bldg Corp - 836480
2. SB Bldg Corp - 836482
3. SB EDIT- 836518
4. SB Econ Dev Rev - 836520
5. SB Red Authority - 836562
6. SB Sewage Works - 836615
7. SB Water Works - 836632
8. SB Redev District - 836565
9. SB Redev District - 836568
10. SB Redev District – 836570 (refunded)
11. SB Bldg Corp Mortgage – 836481 (refunded)

### South Bend CUSIP Reporting Group

- A new CUSIP group has been established for financial/operating disclosures entitled “**South Bend EMMA Group**” using the CUSIP numbers listed above. To insure consistency in submitting new financial/operating disclosures, all new documents and reports will be published in EMMA using the South Bend EMMA Group. The financial advisor will advise the City Controller and Deputy Controller of any new six-digit CUSIP numbers listed above so that the reporting group may be updated. The City Controller will review any documents before they are posted to EMMA.

### Records/Other

- Continuing disclosure documents (i.e. Annual Report, CAFR) are available on the EMMA website. In addition, the financial/operating information is also being posted timely to the City website at <http://docs.southbendin.gov/weblink8/Browse.aspx?startid=1214>. The City will maintain a log of all financial/operating and event filings by the City and financial advisor (Exhibit B) which will include the document name, fiscal period covered, date published on EMMA, date updated on EMMA, name of person who published the document and the submission identification number. The City will retain a hard copy of each EMMA Published Submission Confirmation report that is generated by the system. The financial advisor will provide the City with a copy of the confirmation reports for submissions that they have made within five (5) days of publication or update.
- The City of South Bend registered with EMMA on September 9, 2009 and authorized the City Controller and Deputy City Controller to make continuing disclosure submissions. In addition, the City’s financial advisor has been granted access to make continuing disclosure submissions. The City Controller may update this procedure as needed to comply with continuing disclosure requirements.
- Training - City of South Bend personnel and others involved in continuing disclosure will receive annual training including access to the videos, podcasts, fact sheets and other materials available at the MSRB Education Center website at [www.msrb.org](http://www.msrb.org).
- Pre-filing review - all proposed EMMA filings will be reviewed and approved by the City Controller prior to being published.
- Document retention – a copy of all bond documents including bond transcript and official statement will be retained by the City Controller and Deputy City Controller. In addition, bond counsel will maintain a copy of any bond transcript that they have been contracted to work on.
- Investor Inquiry – all vendor inquiries will be directed to the City Controller for follow-up action. If the City Controller is not available, the Deputy City Controller is authorized to respond to investor inquiries.

- Regulator Inquiry – the City Controller and Corporation Counsel will be notified immediately of any inquiry from the Securities and Exchange Commission, Internal Revenue Service or other governmental agency related to continuing disclosure matters.
- The attached document from the Municipal Securities Rulemaking Board entitled *FAQ's on MSRB's Continuing Disclosure Submission Process* (Exhibit A) is included in this procedure by reference and will be utilized by the City, financial advisor and others in implementing this procedure.



**MSRB**

Municipal Securities  
Rulemaking Board

**EMMA – Electronic Municipal Market Access**

The Official Source for Municipal Disclosures and Market Data

## **FAQs on MSRB's Continuing Disclosure Submission Process**

Version 1.2, July 2013

## **FAQs on MSRB's Continuing Disclosure Submission Process**

Following are commonly asked questions about the Municipal Securities Rulemaking Board's submission process for continuing disclosures on EMMA.

### **General Questions**

#### **1. What is continuing disclosure information?**

Continuing disclosure information is certain information about a municipal bond that arises after the initial issuance of the bonds. This information generally reflects the financial or operating condition of the issuer (or other party responsible for the repayment of some or all of the bonds, an "obligated person" or "obligor") as it changes over time, as well as specific events occurring after issuance that can have an impact on the ability of issuer or obligated person to pay amounts owing on the bonds, the value of the bonds if it is bought or sold prior to its maturity, the timing of repayment of principal, and other key features of the bonds.

#### **2. What rule requires continuing disclosure of information?**

Rule 15c2-12 of the Securities Exchange Act of 1934 requires dealers, when underwriting certain types of municipal securities, to obtain certain information about the securities as well as make sure that the issuer or obligated person has agreed (in a written agreement usually referred to as a "continuing disclosure agreement") to make certain information about the securities available on an on-going basis.

#### **3. When did the requirement to submit continuing disclosure documents to EMMA become effective?**

The provisions of revised Rule 15c2-12 became effective for continuing disclosure agreements entered into on or after July 1, 2009.

#### **4. What information must be disclosed?**

The information that must be disclosed is generally divided between updated financial or operating information about the issuer or obligated person, and notices that disclose the occurrence of specific events that may have an impact on the bonds. These events are described below.

- (1) principal and interest payment delinquencies;
- (2) non-payment related defaults, if material;
- (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, certain notices from the IRS or determinations with respect to the tax status of the security, or other material events affecting the tax status of the security;
- (7) modifications to rights of security holders, if material;
- (8) bond calls, if material, and tender offers;
- (9) defeasances;
- (10) release, substitution, or sale of property securing repayment of the securities, if material;
- (11) rating changes;
- (12) bankruptcy, insolvency, receivership or similar event of the obligated person or issuer;
- (13) consummation of a merger, consolidation or acquisition of, or the sale of all or substantially all of the assets of, an obligated person or issuer, other than in the ordinary course of business, or the entry into or termination of an agreement relating to such actions if other than pursuant to its terms, if material;
- (14) appointment of a successor or additional trustee or the change in the name of a trustee, if material; and

(15) failure of an issuer or obligated person to provide annual financial information as required.

**5. Are there some municipal securities issues for which no continuing disclosure information is required?**

Yes. Some issues of municipal securities are exempt from either the financial information disclosure or the event disclosure, or both. These exemptions are generally based on the size of the transaction, the term to maturity, the persons to whom the securities are sold, the ability of investors to "put" the bonds to the issuer under prescribed circumstances; or when the securities were issued.

**Submission Procedures**

**1. What types of continuing disclosure can be made to EMMA?**

EMMA accepts two broad categories of continuing disclosure: annual/periodic filings such as comprehensive annual financial reports, and event filings that report material events.

**2. How do submitters establish accounts to submit documents to EMMA?**

In order to submit documents to EMMA, all submitters must create an account in MSRB Gateway, the secure access point for EMMA and other MSRB applications.

**3. How do submitters input documents and other information into EMMA?**

EMMA supports two methods for accepting input: a set of web-based input screens accessible by web browser for accommodating individual submissions, and a secure, authenticated computer-to-computer connection for batch submissions. The submitter may elect to use either or both interfaces. For more information, please see MSRB Notice 2009-10.

**4. Can multiple submissions be made to EMMA at one time?**

Yes. The computer-to-computer interface supports submission of one or many documents (and associated indexing information) continuously.

**5. Does the EMMA website require a particular format for submitted continuing disclosure documents?**

Continuing disclosure documents must be submitted to the EMMA website as word-searchable portable document format (PDF) files that permit the document to be saved, viewed, printed and retransmitted by electronic means. If the submitted file is a reproduction of the original document, the submitted file must

maintain the graphical and textual integrity of the original document.

**6. What version of Adobe Acrobat must be used to submit disclosure documents?**

Any version of Adobe Acrobat or other software that creates files adhering to the PDF file specification is acceptable for EMMA submissions as long as the resulting document is word-searchable and can be saved, viewed, printed and retransmitted by electronic means.

**7. What are the submission size limits on EMMA?**

EMMA has been designed to accept submissions without practical size limits. Documents that are hundreds of pages long can be uploaded into EMMA. For continuing disclosures, a document can be associated with hundreds of CUSIP numbers. Please note that Internet speeds may be a factor.

**8. In the course of making a submission to EMMA, can work be saved and are there any limitations on saving work?**

Submitters can temporarily save information entered into EMMA if they are interrupted before completing the submission. This prevents the loss of information if a submitter is "timed out" due to inactivity on a computer. The "save" feature is available for any type of submission. Currently, the "save" capability is limited in the following ways:

- Only one continuing disclosure submission can be saved at a time. A second "save" of the same type of submission would overwrite the first.
- All entered information is saved except for uploaded documents. These will have to be uploaded again when resuming work.
- If submitted information has been "published," subsequent updates to the submission do not need to be saved.

**9. Does EMMA provide a receipt confirming submissions?**

Yes. EMMA sends the submitter of a continuing disclosure a receipt every time the submitter publishes information. Information in the receipt includes type and category of submission; time and date of submission; submission ID; CUSIP numbers, issuer names and issue descriptions associated with the disclosure; and name of file(s) submitted.

**10. Can a submitter delete or replace a continuing disclosure submission after it is published on EMMA?**

Yes. Submitters can modify a submission after it has been published. Recent submissions will be shown and can be accessed by clicking on the submission ID. Older submissions must be accessed by typing in the submission ID that was sent to the submitter at the time of the original submission.

**11. Does a submission need to list every CUSIP that is associated with the bond issue?**

Not necessarily. At the submitter's request, EMMA will display all issues of an issuer. The submitter may designate those CUSIP numbers within an issue that are associated with a particular continuing disclosure. For example, a submitter may specify a six-digit CUSIP number ("issuer CUSIP") and state that all nine-digit CUSIPs of that issuer CUSIP are related to a filing. A submitter may also group several issuer CUSIPs together, if they are all associated with a municipality or obligor. The user-defined group of CUSIP numbers can be reused for later submissions.

**12. Can I submit a continuing disclosure document that relates to multiple CUSIP numbers (maturities)? Can I submit multiple documents at one time?**

Typical continuing disclosures in EMMA relate to multiple CUSIP numbers. When you make a continuing disclosure submission, entering an issuer's six-digit CUSIP number base causes all of its issues to be displayed. Check the box next to any (or all) issues to associate all the maturities in the issue with the disclosure. Multiple documents can be submitted also, provided that all of them are in the same category (such as "event of default") and that all relate to the same set of CUSIP numbers.

**13. How long does it take for continuing disclosure information to appear on EMMA after submission?**

EMMA will generally make all submitted documents available to the public within an hour of submission.

**14. How can issuers alert investors about bond calls and other event information submitted to EMMA?**

EMMA has an "alert" feature by which individuals can be notified whenever a submission is made against specified securities. Issuers may suggest that investors sign up for these alerts.

**15. Does the EMMA website provide notification to submitters when a document such as annual financial report is due to be posted?**

Yes. EMMA provides an "email reminder" feature by which submitters can schedule reminders for recurring financial disclosures. Using this feature, issuers may send email reminders for upcoming filing deadlines to anyone with a role in preparing and filing financial disclosures. [Read more](#)

**16. Can individual users within an organization collaborate on continuing disclosures – for example, can one user in an organization update the submission made by another?**

The answer depends on how the users have established their Gateway accounts. Users sharing the same organization account can view and amend each other's submissions. However continuing disclosure accounts are one-user accounts and the management of a given continuing disclosure submission cannot be shared between continuing disclosure accounts.

**17. What is the difference between an organization account and a continuing disclosure account?**

An organization account allows an organization to submit all available types of continuing disclosure and primary market filings to EMMA. Shared access by multiple users allows the organization to better manage the disclosure process. Continuing disclosure accounts are individual user accounts that allow staff to immediately submit SEC Rule 15c2-12 disclosures to EMMA. No other EMMA filings can be made with a continuing disclosure account, but the account can later be upgraded to an organization account.

**18. Can issuers receive notification from EMMA when continuing disclosure information pertaining to their bonds is submitted?**

Yes. EMMA allows an issuer or obligated person to indicate the CUSIP numbers for which they wish to receive notification of submission. EMMA will send such a notice when any continuing disclosure is submitted that is associated with the CUSIPs.

**19. Does EMMA display information showing the contact person for more information about a continuing disclosure submission?**

Yes. The submitter of a continuing disclosure can indicate a contact of the issuer or obligated person, including the contact's name, telephone number and address. In the absence of such contact information, EMMA will display the contact information of the submitter.

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**20. Is continuing disclosure required for 529 college savings plans? Will EMMA accept such disclosures since 529 plans don't have CUSIP numbers?**

The issuer or obligated person of a 529 college savings plan must undertake to provide continuing disclosure, as for any municipal security. EMMA will accept such disclosures, as described in the EMMA user's manual for continuing disclosure submissions.

**21. What does it cost to submit documents to EMMA?**

There is no charge to submit continuing disclosure documents to EMMA. Indexing Information for Continuing Disclosures

**Indexing Information for Continuing Disclosures**

**1. In the process of making a continuing disclosure, how does a submitter identify the issues or securities associated with a continuing disclosure?**

The EMMA submission screens provide the opportunity for the submitter to provide indexing information for submissions. This information will also allow the public to search and retrieve continuing disclosures for a specific municipal securities issue.

**Agents and Issuer Controls**

**1. Can an agent or obligated person submit continuing disclosure documents on behalf of an issuer?**

Yes.

**2. Can one party submit continuing disclosures for several issuers?**

Yes. Issuers can designate a single party as their agent for the submission of continuing disclosures to EMMA, and agents can act on behalf of multiple issuers.

**3. Does an agent of an obligated person require permission of the issuer to submit continuing disclosures on the conduit securities?**

The issuer of a municipal security has the option to assert control of its securities. If the issuer has asserted control, only agents designated by that issuer can submit continuing disclosures that involve the security. If, however, the issuer does not assert control of its securities, the agent may submit continuing disclosures without being a designated agent.

**. Must the issuer assert control over its securities for continuing disclosures to be made?**

No. The issuer may choose to refrain from asserting control over securities. In such a case, any agent's submission associated with the securities will be published on the EMMA public portal.

**5. Can an issuer prevent an agent from making submissions on its behalf?**

Yes, issuers can revoke the authority of a party to act as a designated agent.

**6. My company serves as dissemination agent for issuers. Sometimes an issuer gives me its disclosure document the day it is due to be disseminated. Will I be able to submit the document to EMMA without delay?**

If the issuer has not asserted control of its securities, or if the issuer has designated you in advance as its agent, you can submit a disclosure immediately.

**7. May a dissemination agent scan and submit audited financials which currently exist only as hard copies, even though the resulting files will not be word-searchable?**

Effective January 1, 2010, all submissions on EMMA must be word searchable.

**8. Can I get assistance with any EMMA topic from the MSRB user support phone line?**

Yes. Call MSRB's support line at (703) 797-6668, for support on all EMMA topics. The MSRB does not, however, provide investment or legal advice.

City of South Bend, Indiana  
 Electronic Municipal Market Access (EMMA) Continuing Disclosure Summary  
 Enma.msrb.org - South Bend Account Set up September, 2009 - MSRB ID: D003M6  
 March 9, 2015

| Document Type                           | Period    | EMMA Type           | Published By      | Date Published | Date Updated | Date Updated | Submission ID | Notes  |
|---|-----------|---------------------|-------------------|----------------|--------------|--------------|---------------|--|
| Financial/Operating Filings             | 2005-2009 | Financial/Operating | Financial Advisor | 12/14/10       | --           | --           |               |  |
| CAFR                                    | 2004      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33397      | Five years CAFR's filed by financial advisor                           |
| CAFR                                    | 2005      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33388      | Previous Deputy City Controller in 2005 and prior years                |
| CAFR                                    | 2006      | Financial/Operating | Financial Advisor | 12/14/10       | --           | --           |               | Previous Deputy City Controller in 2006 and prior years                |
| CAFR                                    | 2006      | Financial/Operating | Financial Advisor | 10/11/11       | --           | --           |               |  |
| CAFR                                    | 2006      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33045      | City Mailed to Bloomberg, S&P, NRMISIR repositories on July 3, 2007    |
| CAFR                                    | 2007      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33044      | City Mailed to Bloomberg, S&P, NRMISIR repositories on August 11, 2008 |
| CAFR                                    | 2007      | Financial/Operating | Financial Advisor | 12/14/10       | --           | --           |               |  |
| Failure to file                         | 2008      | Financial/Operating | US Bank           | 7/30/14        | --           | --           |               | US Bank Memo Filed   |
| CAFR                                    | 2008      | Financial/Operating | John Murphy       | 9/02/09        | 11/27/14     | 12/03/14     | EP314653      | Email confirmation received 9/22/09                                    |
| CAFR                                    | 2008      | Financial/Operating | Financial Advisor | 12/14/10       | --           | --           |               |  |
| CAFR                                    | 2008      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33043      | City Mailed to Bloomberg, S&P, NRMISIR repositories                    |
| CAFR                                    | 2009      | Financial/Operating | Gregg Zientara    | 6/28/10        | --           | --           | Confirmed     | Email confirmation received 6/28/10                                    |
| CAFR                                    | 2009      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33041      |  |
| CAFR                                    | 2010      | Financial/Operating | Financial Advisor | 6/29/11        | --           | --           |               |  |
| CAFR                                    | 2010      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33039      | Filed as an Event, should be a Financial/Operating filing              |
| CAFR                                    | 2011      | Event               | Financial Advisor | 7/18/12        | --           | --           |               |  |
| CAFR                                    | 2011      | Event               | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33037      | Filed as an Event, should be a Financial/Operating filing              |
| CAFR                                    | 2012      | Event               | Financial Advisor | 7/17/13        | --           | --           |               |  |
| CAFR                                    | 2012      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33036      | Filed as an Event, should be a Financial/Operating filing              |
| CAFR                                    | 2013      | Event               | Financial Advisor | 8/07/14        | --           | --           |               |  |
| CAFR                                    | 2013      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33033      | Filed as an Event, should be a Financial/Operating filing              |
| Annual Financial Report/CTAR            | 2004      | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34205      | CTAR hard copies retrieved from City archives and posted               |
| Annual Financial Report/CTAR            | 2005      | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34204      | CTAR hard copies retrieved from City archives and posted               |
| Annual Financial Report/CTAR            | 2006      | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34202      | CTAR hard copies retrieved from City archives and posted               |
| Annual Financial Report/CTAR            | 2007      | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34200      | CTAR hard copies retrieved from City archives and posted               |
| Annual Financial Report/CTAR            | 2008      | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34197      | CTAR hard copies retrieved from City archives and posted               |
| Annual Financial Report/CTAR Adv.       | 2008      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33053      | CTAR advertisement found on-site                                       |
| Annual Financial Report/CTAR            | 2009      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33052      | plan to file annually within 180 days of year end                      |
| Annual Financial Report/CTAR            | 2010      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33049      | plan to file annually within 180 days of year end                      |
| Annual Financial Report/CTAR            | 2011      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33047      | plan to file annually within 180 days of year end                      |
| Annual Financial Report/CTAR            | 2012      | Financial/Operating | John Murphy       | 9/02/14        | 11/27/14     | 12/03/14     | EAS33046      | plan to file annually within 180 days of year end                      |
| Annual Financial Report/CTAR/Stats      | 2013      | Financial/Operating | Financial Advisor | 6/30/14        | 11/27/14     | 12/03/14     |               | Annual Financial Report plus certain stats pages - per US Bank         |
| Annual Financial Report/CTAR            | 2013      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33344      | plan to file annually within 180 days of year end                      |
| Annual Financial Report/CTAR Adv.       | 2014      | Financial/Operating | John Murphy       | 2/13/15        | --           | --           | ER67590       | CTAR advertisement posted  |
| Annual Financial Report/CTAR            | 2014      | Financial/Operating | John Murphy       | 3/03/15        | --           | --           | EAS62030      | plan to file annually within 180 days of year end                      |
| Employment by Industry and Type         | 2004-2013 | Financial/Operating | John Murphy       | 3/05/15        | --           | --           | ER67975       | plan to file annually within 180 days of year end - include with CAFR  |
| Financial Institution Statistics        | 2004-2013 | Financial/Operating | John Murphy       | 3/05/15        | --           | --           | ER67975       | plan to file annually within 180 days of year end - include with CAFR  |
| Saint Joseph County Net Assessed Values | 2005-2014 | Financial/Operating | John Murphy       | 3/06/15        | --           | --           | ER67973       | plan to file annually within 180 days of year end - county report      |
| Hotel/Vote Tax Debt Service Coverage    | 2014-2026 | Financial/Operating | John Murphy       | 3/07/15        | --           | --           | ER680371      | plan to file annually within 180 days of year end - include with CAFR  |
| Board of Finance Investment Report      | 2011      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33362      | voluntary filing - plan to file annually                               |
| Board of Finance Investment Report      | 2012      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33054      | voluntary filing - plan to file annually                               |
| Board of Finance Investment Report      | 2013      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33357      | voluntary filing - plan to file annually                               |
| Board of Finance Investment Report      | 2014      | Financial/Operating | John Murphy       | 1/26/15        | --           | --           | EAS68108      | voluntary filing - plan to file annually                               |
| Budget Consolidated Yellow Sheets       | 2014      | Financial/Operating | John Murphy       | 9/05/14        | 11/22/14     | 12/03/14     | EAS34649      | voluntary filing - plan to file annually                               |
| Budget Book                             | 2015      | Financial/Operating | John Murphy       | 11/06/14       | 11/22/14     | 12/03/14     | EAS53612      | voluntary filing - plan to file annually                               |
| GFOA Adopted Budget                     | 2015      | Financial/Operating | John Murphy       | 1/23/15        | --           | --           | EAS67541      | voluntary filing - plan to file annually                               |
| Fitch Investors Ratings Report          | 2015      | Financial/Operating | John Murphy       | 3/08/15        | --           | --           | ER680376      | voluntary filing - plan to file as reports are issued                  |
| Standard and Pools Ratings Report       | 2015      | Financial/Operating | John Murphy       | 3/12/15        | --           | --           | ER682337      | voluntary filing - plan to file as reports are issued                  |

City of South Bend, Indiana  
 Electronic Municipal Market Access (EMMA) Continuing Disclosure Summary  
 Emma.msrb.org - South Bend Account Set up September, 2009 - MSRB ID-D003M6  
 March 9, 2015

| Document Type                           | Period          | EMMA Type           | Published By      | Date Published | Date Updated | Date Updated | Submission ID | Notes  |
|---|-----------------|---------------------|-------------------|----------------|--------------|--------------|---------------|--|
| Departmental Financial Report           | June 2013       | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33410      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | September 2013  | Financial/Operating | John Murphy       | 9/04/14        | 11/27/14     | 12/03/14     | EAS34192      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | December 2013   | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33504      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | March 2014      | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33520      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | June 2014       | Financial/Operating | John Murphy       | 9/03/14        | 11/27/14     | 12/03/14     | EAS33530      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | September 2014  | Financial/Operating | John Murphy       | 11/06/14       | 11/27/14     | 12/03/14     | ER653609      | voluntary filing - filed quarterly                                   |
| Departmental Financial Report           | October 2014    | Financial/Operating | John Murphy       | 11/23/14       | 11/27/14     | 12/03/14     | ER655115      | voluntary filing - plan to file monthly in the future                |
| Departmental Financial Report           | November 2014   | Financial/Operating | John Murphy       | 12/19/14       | --           | --           | ER660805      | voluntary filing - plan to file monthly in the future                |
| Departmental Financial Report           | December 2014   | Financial/Operating | John Murphy       | 2/09/15        | --           | --           | EAS73471      | voluntary filing - plan to file monthly in the future                |
| Departmental Financial Report           | January 2015    | Financial/Operating | John Murphy       | 2/20/15        | --           | --           | EAS74800      | voluntary filing - plan to file monthly in the future                |
| Financial Report                        | June 2013       | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34828      | voluntary filing - filed quarterly                                   |
| Financial Report                        | October 2013    | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34825      | voluntary filing - filed quarterly                                   |
| Financial Report                        | December 2013   | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34827      | voluntary filing - filed quarterly                                   |
| Financial Report                        | March 2014      | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34826      | voluntary filing - filed quarterly                                   |
| Financial Report                        | June 2014       | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34824      | voluntary filing - filed quarterly                                   |
| Financial Report                        | September 2014  | Financial/Operating | John Murphy       | 11/06/14       | 11/28/14     | 12/03/14     | ER653610      | voluntary filing - filed quarterly                                   |
| Financial Report                        | October 2014    | Financial/Operating | John Murphy       | 11/23/14       | 11/28/14     | 12/03/14     | ER658114      | voluntary filing - plan to file monthly in the future                |
| Financial Report                        | November 2014   | Financial/Operating | John Murphy       | 12/19/14       | --           | --           | ER660801      | voluntary filing - plan to file monthly in the future                |
| Financial Report                        | December 2014   | Financial/Operating | John Murphy       | 2/09/15        | --           | --           | EAS73468      | voluntary filing - plan to file monthly in the future                |
| Financial Report                        | January 2015    | Financial/Operating | John Murphy       | 2/20/15        | --           | --           | EAS74804      | voluntary filing - plan to file monthly in the future                |
| Controller's Cash Report                | June 2013       | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34835      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | September 2013  | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34837      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | December 2013   | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34834      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | March 2014      | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34832      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | June 2014       | Financial/Operating | John Murphy       | 9/05/14        | 11/28/14     | 12/03/14     | EAS34831      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | September 2014  | Financial/Operating | John Murphy       | 11/06/14       | 11/28/14     | 12/03/14     | ER653611      | voluntary filing - filed quarterly                                   |
| Controller's Cash Report                | October 2014    | Financial/Operating | John Murphy       | 11/23/14       | 11/28/14     | 12/03/14     | ER658116      | voluntary filing - plan to file monthly in the future                |
| Controller's Cash Report                | November 2014   | Financial/Operating | John Murphy       | 11/23/14       | 11/28/14     | 12/03/14     | ER656003      | voluntary filing - plan to file monthly in the future                |
| Controller's Cash Report                | December 2014   | Financial/Operating | John Murphy       | 1/26/15        | --           | --           | EA568112      | voluntary filing - plan to file monthly in the future                |
| Controller's Cash Report                | January 2015    | Financial/Operating | John Murphy       | 2/11/15        | --           | --           | ER674734      | voluntary filing - plan to file monthly in the future                |
| Controller's Cash Report                | February 2015   | Financial/Operating | John Murphy       | 3/10/15        | --           | --           | ER681198      | voluntary filing - plan to file monthly in the future                |
| Local Option Income Tax Revenue Summary | 2004-2015       | Financial/Operating | John Murphy       | 11/23/14       | --           | 12/03/14     | EAS49867      | voluntary filing - plan to update annually                           |
| Property Tax Revenue Summary            | 2006-June, 2014 | Financial/Operating | John Murphy       | 11/23/14       | --           | 12/03/14     | EAS49869      | voluntary filing - plan to update annually                           |
| Property Tax Revenue Summary            | 2006-Dec, 2014  | Financial/Operating | John Murphy       | 1/03/15        | --           | --           | ER687219      | voluntary filing - plan to update annually                           |
| CAFR Executive Summary                  | 2012            | Financial/Operating | John Murphy       | 11/23/14       | --           | 12/03/14     | EAS49877      | voluntary filing - plan to update annually                           |
| CAFR Executive Summary                  | 2013            | Financial/Operating | John Murphy       | 11/23/14       | --           | 12/03/14     | EAS49878      | voluntary filing - plan to update annually                           |
| 2014 Mayor's Address to Council         | 2014            | Financial/Operating | John Murphy       | 2/09/14        | --           | --           | EAS73650      | voluntary filing - plan to update annually                           |
| Event Filings                           | --              | Event               | Financial Advisor | 1/12/11        | --           | --           | EAS55534      | SB Building Corporation - email from Gregg Zientara                  |
| Fiduciary Communications Company        | --              | Event               | Company           | 12/02/14       | --           | --           | ER662692      | Submitted by EZ, One State Street Plaza, New York                    |
| Fiduciary Communications Company        | --              | Event               | Company           | 12/23/14       | --           | --           | ER665694      | Bond Call as of 12/23/14   |
| MDC South Bend, LLC                     | --              | Event               | John Murphy       | 12/29/14       | --           | --           | ER667207      | GE Capital Default Notice dated 12/16/14, Borrower - MDC South Bend. |
| Fiduciary Communications Company        | --              | Event               | Company           | 12/31/14       | --           | --           | EAS65434      | Bond Call as of 12/31/14   |
| Fiduciary Communications Company        | --              | Event               | Company           | 1/21/15        | --           | --           | EAS65500      | Bond Call as of 1/21/15  |
| Fiduciary Communications Company        | --              | Event               | Company           | 12/31/14       | --           | --           |               | Bond Call as of 1/21/15  |