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December 30, 2020

VIA UPS NEXT DAY AIR

Department of the Treasury
Internal Revenue Service Center
1160 West 12th Street
Ogden, UT 84201


Re: Banyan Cay Community Development District
Special Assessment Bonds Series 2020 (Phase One Assessment Area)

Ladies and Gentlemen:

Enclosed please find the Form 8038-G in connection with the captioned issuance of bonds.

Thank you for your assistance.

Very truly yours,


Clara Sue Stegemann
Legal Assistant

Enclosure

ADMIN 38028074v1

Information Return for Tax-Exempt Governmental Bonds

(Rev. September 2018)

► Under Internal Revenue Code section 149(e)

► See separate instructions.

OMB No. 1545-0720

Department of the Treasury
Internal Revenue Service

Caution: If the issue price is under \$100,000, use Form 8038-GC.
► Go to www.irs.gov/F8038G for instructions and the latest information.

Part I Reporting Authority If Amended Return, check here

1 Issuer's name Banyan Cay Community Development District		2 Issuer's employer identification number (EIN) 83-3353244	
3a Name of person (other than issuer) with whom the IRS may communicate about this return (see instructions) Neil Kalin		3b Telephone number of other person shown on 3a 561.360.4922	
4 Number and street (or P.O. box if mail is not delivered to street address) Room/suite c/o Special District Services, Inc. 2501 A Burns Road		5 Report number (For IRS Use Only) 3	
6 City, town, or post office, state, and ZIP code Palm Beach Gardens, FL 33410		7 Date of issue 12/17/2020	
8 Name of issue Special Assessment Bonds, Series 2020 (Phase One Assessment Area)		9 CUSIP number 06683Y AB2	
10a Name and title of officer or other employee of the issuer whom the IRS may call for more information (see instructions) Alicia Lewis, Chairperson		10b Telephone number of officer or other employee shown on 10a 561.557.5840	

Part II Type of Issue (enter the issue price). See the instructions and attach schedule.

11 Education	11		
12 Health and hospital	12		
13 Transportation	13		
14 Public safety	14		
15 Environment (including sewage bonds)	15		
16 Housing	16		
17 Utilities	17		
18 Other. Describe ► public infrastructure including roadways, stormwater mgmt, and utilities	18	6,895,000	00
19a If bonds are TANs or RANs, check only box 19a			<input type="checkbox"/>
b If bonds are BANs, check only box 19b			<input type="checkbox"/>
20 If bonds are in the form of a lease or installment sale, check box			<input type="checkbox"/>

Part III Description of Bonds. Complete for the entire issue for which this form is being filed.

	(a) Final maturity date	(b) Issue price	(c) Stated redemption price at maturity	(d) Weighted average maturity	(e) Yield
21	11/01/2051	\$ 6,895,000	\$ 6,895,000	19.2065 years	3.9763 %

Part IV Uses of Proceeds of Bond Issue (including underwriters' discount)

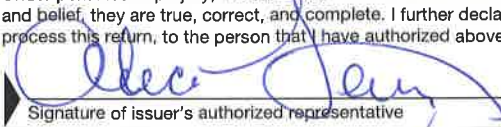
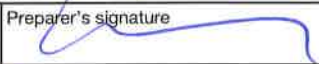
22 Proceeds used for accrued interest	22		
23 Issue price of entire issue (enter amount from line 21, column (b))	23	6,895,000	00
24 Proceeds used for bond issuance costs (including underwriters' discount)	24	401,141	50
25 Proceeds used for credit enhancement	25	0	00
26 Proceeds allocated to reasonably required reserve or replacement fund	26	400,000	00
27 Proceeds used to refund prior tax-exempt bonds. Complete Part V	27	0	00
28 Proceeds used to refund prior taxable bonds. Complete Part V	28	0	00
29 Total (add lines 24 through 28)	29	801,141	50
30 Nonrefunding proceeds of the issue (subtract line 29 from line 23 and enter amount here)	30	6,093,858	50

Part V Description of Refunded Bonds. Complete this part only for refunding bonds.

31 Enter the remaining weighted average maturity of the tax-exempt bonds to be refunded	►	_____ years
32 Enter the remaining weighted average maturity of the taxable bonds to be refunded	►	_____ years
33 Enter the last date on which the refunded tax-exempt bonds will be called (MM/DD/YYYY)	►	_____
34 Enter the date(s) the refunded bonds were issued (MM/DD/YYYY)	►	_____

Part VI Miscellaneous

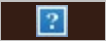
35 Enter the amount of the state volume cap allocated to the issue under section 141(b)(5)	35		
36a Enter the amount of gross proceeds invested or to be invested in a guaranteed investment contract (GIC). See instructions	36a		
b Enter the final maturity date of the GIC ▶ (MM/DD/YYYY) _____			
c Enter the name of the GIC provider ▶ _____			
37 Pooled financings: Enter the amount of the proceeds of this issue that are to be used to make loans to other governmental units	37		
38a If this issue is a loan made from the proceeds of another tax-exempt issue, check box ▶ <input type="checkbox"/> and enter the following information:			
b Enter the date of the master pool bond ▶ (MM/DD/YYYY) _____			
c Enter the EIN of the issuer of the master pool bond ▶ _____			
d Enter the name of the issuer of the master pool bond ▶ _____			
39 If the issuer has designated the issue under section 265(b)(3)(B)(i)(III) (small issuer exception), check box ▶ <input type="checkbox"/>			
40 If the issuer has elected to pay a penalty in lieu of arbitrage rebate, check box ▶ <input type="checkbox"/>			
41a If the issuer has identified a hedge, check here ▶ <input type="checkbox"/> and enter the following information:			
b Name of hedge provider ▶ _____			
c Type of hedge ▶ _____			
d Term of hedge ▶ _____			
42 If the issuer has superintegrated the hedge, check box ▶ <input type="checkbox"/>			
43 If the issuer has established written procedures to ensure that all nonqualified bonds of this issue are remediated according to the requirements under the Code and Regulations (see instructions), check box ▶ <input checked="" type="checkbox"/>			
44 If the issuer has established written procedures to monitor the requirements of section 148, check box ▶ <input checked="" type="checkbox"/>			
45a If some portion of the proceeds was used to reimburse expenditures, check here ▶ <input type="checkbox"/> and enter the amount of reimbursement ▶ _____			
b Enter the date the official intent was adopted ▶ (MM/DD/YYYY) _____			

Signature and Consent	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I consent to the IRS's disclosure of the issuer's return information, as necessary to process this return, to the person that I have authorized above.			
		12/17/2020	Alicia Lewis, Chairperson	
	Signature of issuer's authorized representative	Date	Type or print name and title	
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	Rebecca Harrigal		12/20/2020	PTIN P02041167
	Firm's name ▶ Greenberg Traurig, PA	Firm's EIN ▶ 59-1270754		Phone no. 215.988.7836
Firm's address ▶ 333 S.E. 2nd Avenue, Suite 4400, Miami, FL 33131				

From: [Stegeman, Clara Sue \(Para-Mia-BD\)](#)
To: [Hentrich, Teresa M. \(Secy-Phil-Bky\)](#); [Harrigal, Rebecca L. \(Shld-PHI-Tx\)](#); [Teresi, Sheryl \(BSTf-WPB-BD\)](#); [Sanford, Stephen \(Shld-WPB-Bond\)](#)
Subject: FW: Banyan Cay CDD UPS Delivery Notification, Tracking Number 1Z3796460192671448
Date: Thursday, December 31, 2020 11:50:35 AM

From: UPS Quantum View <pkginfo@ups.com>
Sent: Thursday, December 31, 2020 11:48 AM
To: Stegeman, Clara Sue (Para-Mia-BD) <STEGEMANC@gtlaw.com>
Subject: Banyan Cay CDD UPS Delivery Notification, Tracking Number 1Z3796460192671448

EXTERNAL TO GT



Hello, your package has been delivered.

Delivery Date: Thursday, 12/31/2020
Delivery Time: 09:26 AM
Left At: DOCK
Signed by: ID Verified

GREENBERG TRAUIG

Tracking Number: [1Z3796460192671448](#)

Ship To: INTERNAL REVENUE SERVICE CENTER
DEPARTMENT OF THE TREASURY
1160 WEST 12TH STREET
OGDEN, UT 842010001
US

Number of Packages: 1

UPS Service: UPS Next Day Air®

Package Weight: 1.0 LBS

Reference Number: 185232.010100

Reference Number: CLARA SUE STEGEMANN



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