

EXHIBIT A

STJ HOTEL GROUP

CHAPTER 100 TAX ABATEMENT INCENTIVES

Pursuant to the provisions of Article VI, Section 27(b) of the Missouri Constitution and Sections 100.010 through 100.200, inclusive, of the Revised Statutes of Missouri, as amended (collectively, the “**Act**”), in connection with the City’s expected issuance of industrial development revenue bonds under the Act in a principal amount of approximately \$60,000,000 (the “**Bonds**”) to finance the costs of development project for the benefit of STJ Hotel Group, LLC (together with its related affiliates, the “**Company**”) consisting of (1) constructing two new boutique hotels and one conference center, which is expected to include 249 hotel rooms, fitness centers, lobby bars and restaurants, pools, approximately 12,640 square feet of conference center/ballroom space and 315 surface parking spaces (collectively, the “**Project Improvements**”), that will be situated on an approximately 7.7 acre real property site located at the southeast corner of Woodbine Road and Frederick Avenue in the City (the “**Project Site**”), and (2) acquiring and installing certain equipment and personal property within the Project Improvements (the “**Project Equipment**”), the City Council preliminarily approves the following incentives to be offered to the Company, subject to the conditions to the issuance of the Bonds set forth in **Section 5** of the Resolution approved by the City Council on the April 14, 2025.

Real and Personal Property Tax Abatement:

- (a) *Real Property Tax Abatement:* The City proposes the following real property tax abatement incentives:
- (i) Beginning in the year in which the Bonds are issued (expected to be in 2025) (the “**Closing**”) to and including the year in which the Project Improvements are completed (expected to be completed in 2026) (the “**Completion Date**”), the Company will be required to pay a real property payment-in-lieu of taxes (the “**Real Property PILOT**”) equal to 100% of the ad valorem real property taxes owed on the Project Site, and the existing facilities, buildings and improvements located thereon in their state of existence as of the date of Closing (the “**Existing Property**”), based upon the most recent assessed valuation for such Existing Property as of the date of Closing.
 - (ii) Beginning in the year following the year in which the Completion Date occurs to and including the fifteenth (15th) year following the year in which the Completion Date occurs (estimated to be years 2027 through 2041), the Company will be required to pay a Real Property PILOT Payment amount equal to 100% of the amount of ad valorem real property taxes that would have otherwise been due on the Existing Property based upon the assessed valuation of such Existing Property established as of the date of Closing as described in subparagraph (i) above; and
 - (iii) For each year thereafter to and including the twenty-fifth (25th) year following the year in which the Completion Date occurs (estimated to be years 2042 through 2051), the Company will be required to pay a Real Property PILOT Payment amount equal to 50% multiplied by the amount of ad valorem real property taxes which would otherwise be due with respect to the Project Site and the Project Improvements located thereon.

- (b) *Personal Property Tax Abatement:* The City proposes the following personal property tax abatement incentives:

The Company will receive personal property tax abatement for a period of 25 years on the Project Equipment, as follows: (i) 100% personal property tax abatement in years 1 through 15, and (ii) 50% personal property tax abatement in years 16 through 25. The 25-year period of personal property tax abatement will begin on January 1 of the year in which the applicable portion of the Project Equipment would have first been subject to personal property taxation under Missouri law absent the City's ownership of such Project Equipment.

Sales Tax Exemption on Construction Materials for Project Improvements: As permitted by Section 144.062 of the Revised Statutes of Missouri, as amended, in order to obtain an exemption from State and local sales taxes for construction materials utilized to construct the Project Improvements, the City will provide a project exemption certificate to the Company to be used in connection with the acquisition of construction materials for the Project Improvements. Such project exemption certificate for construction materials shall not be used by the Company in connection with the acquisition of the Project Equipment.

If for some reason the Bonds are never issued or it is determined that such exemption was improperly used or that the City did not have the legal authority to issue such certificate for such purposes, the Company must agree to reimburse the City and/or other recipients of sales tax in an amount equal to the amount of sales tax that was not paid as a result of the use of the City's sales tax exemption certificate.