



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

December 13, 2022

To All Bond Counsel:

RE: Review Status of Citigroup Standing Letter

During the pendency of our review of Citigroup's standing letter with this office regarding Senate Bill 19, we have required issuers to confirm with Citigroup shortly before closing that we can continue to rely on Citigroup's standing letter. This review requires us to determine whether Citigroup is a company that has a practice, policy, guidance, or directive that discriminates against a firearm entity or firearm trade association or that otherwise discriminates against a firearm entity or firearm trade association under chapter 2274 of the Government Code (hereinafter referenced as a "discriminating company").¹ To minimize disruption to the municipal public securities market, we are informing you that we will determine whether or not Citigroup is a discriminating company under Senate Bill 19 by January 13, 2023, and promptly announce such determination pursuant to another "All Bond Counsel" letter.

If Citigroup purchases or underwrites public securities from an issuer with a closing that occurs before January 13, 2023, we will continue to require a confirmation email shortly before closing and will not refuse to approve the public securities based on the pending review before a final determination is made so long as we receive such email confirmation.

If you wish to submit any information for our consideration prior to the determination date of January 13, 2023, please send to SB19@oag.texas.gov. If we determine that Citigroup is not a discriminating company and that we can continue to rely on their standing letter, we will no longer require the additional confirmation email shortly before closing. If we determine that Citigroup is a discriminating company under Senate Bill 19, we will not approve any public security issued on or after that date in which Citigroup purchases or underwrites the public security, or in which Citigroup is otherwise a party to a covered contract relating to the public security, regardless of whether the contract was entered into before such public announcement so long as Citigroup is determined to be a discriminating company under Senate Bill 19. Moreover, our approval of public securities purchased or underwritten by Citigroup before our determination may in no way be construed as waiver or cure of breaches by Citigroup with respect to verifications, representations, or covenants it may have made in any contract, including with respect to verifications, representations, and covenants made with respect to Senate Bill 19.

¹ See Tex. Gov't Code §§ 2274.001(3), .002(b) (defining "discriminate against a firearm entity or firearm trade association" and setting forth the written verification required in the contract) (as enacted by Senate Bill 19).

We have provided this letter pursuant to our authority under section 402.044 of the Government Code, which requires that we advise the proper legal authorities about the issuance of public securities that by law require the attorney general's approval. However, please note that this letter does not dictate how a court may rule in a legal proceeding.

Sincerely,

A handwritten signature in cursive script that reads "Leslie Brock".

Leslie Brock
Assistant Attorney General Chief,
Public Finance Division