



JETSON G. HOLLINGSWORTH

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Jet has served as investor counsel, counsel to community development entities, leverage lender counsel, and QALICB or Developer counsel in over \$800 million in Historic Tax Credits, New Markets Tax Credits and Renewable Energy Tax Credit transactions, including numerous twinned tax credit transactions combining a variety of leverage sources. In addition, Jet has recently focused a large amount of his practice on advising developer and investor clients on Opportunity Zone transactions both establishing Opportunity Zone Funds and Qualified Opportunity Zone Businesses.

PRACTICE AREAS AND INDUSTRY TEAMS

- Public Finance
- Tax Credits
- Opportunity Zone Team
- Economic Development
- Governmental Finance
- Energy Industry Team

EXPERIENCE

- Served as Investor Counsel, Counsel to Community Development Entity, Leverage Lender Counsel or QALICB Counsel in over \$800 Million in New Markets Tax Credit transactions. Example transactions include:
 - Bond Counsel and Counsel to Community Development Entity in new markets tax credits/Mississippi Business Finance Corporation Gulf Opportunity Zone Bond financing for medical office building project located in Pascagoula, MS.
 - Counsel to tax credit investor in new markets tax credits financing for Habitat for Humanity Project located on Mississippi Gulf Coast.
 - Community Development Entity (CDE) counsel in connection with the development of a pipe manufacturing facility in Tunica, Mississippi, which is utilizing federal and state New Markets Tax Credits, CDBG grant funds, Mississippi Major Economic Impact Authority funds, Rural Impact Fund Program funds, Capital Improvements Revolving Loan Fund funds, as well as other state and local economic incentives.
 - CDE counsel in connection with a \$20,000,000 NMTC financing of an acquisition of certain manufacturing equipment to be installed, assembled and operated within a copper tube and line sets manufacturing facility located in rural Mississippi.

- CDE counsel in connection with a \$16,000,000 acquisition, construction, installation and equipping of a sawmill located in rural Mississippi.
- QALICB counsel in connection with the development of a photovoltaic solar facility in Greenfield, Massachusetts, which is utilizing federal New Markets Tax Credits leveraged by Section 1603 Energy Grants and first mortgage financing guaranteed by the United States Department of Agriculture.
- QALICB counsel in New Markets Tax Credit financing for \$18,000,000 expansion/rehab for a rural healthcare facility.
- QALICB/Developer counsel in NMTC financing for \$60,000,000 new replacement rural healthcare facility combining senior and subordinate debt, federal and state NMTCs from multiple CDEs, and leveraging multiple sources including FEMA and insurance proceeds.
- Served as Developer counsel in connection with various Investment Tax Credit and Historic Tax Credit transactions, including multiple twinned credit transactions:
 - QALICB/HTC Counsel to the developer of the approximately \$200,000,000 redevelopment of the historic Sears Crosstown distribution center in Memphis, Tennessee, into a one million square foot mixed-use facility, utilizing 22 different financing sources, including federal NMTC, federal HTC, Qualified Energy Conservation Bonds, HUD BEDI/108 funds and public infrastructure funding from City of Memphis and Shelby County, Tennessee.
 - Counsel to Solar Developer in connection with \$17,000,000 ITC financing for an approximately 1.3 MW (DC) ground mounted solar photovoltaic project.
 - Counsel to Solar Developer in connection with the \$9,200,000 ITC/NMTC twinned financing of the construction, installation, owning and leasing of a solar electric generating system in rural Mississippi.
- Served as Developer/Investor Counsel in numerous Opportunity Zone Fund transactions, including establishing Qualified Opportunity Zone Businesses.
- Served as Bond Counsel and Underwriter Counsel for numerous municipal bond and other public finance transactions. Example transactions include:
 - \$12,240,000 Mississippi Business Finance Corporation Tax-Exempt/Taxable Revenue Bonds (Statesman Housing, LLC Project) Series 2009A and 2009B.
 - \$103,545,000 Mississippi Development Bank Special Obligation Bonds (Municipal Energy Agency of Mississippi Power Supply Project) Series 2006A.
 - \$424,988,000 Mississippi Development Bank Variable Rate Special Obligation Bonds (Municipal Gas Authority of Mississippi Natural Gas Supply Project) 2005 Series.
 - \$870,000,000 Mississippi Business Finance Corporation Taxable Industrial Revenue Bonds (Gulf LNG Energy Project) Series 2008.

BAR ADMISSIONS

- Mississippi, 2001
- U.S. District Courts
 - Mississippi: Northern and Southern Districts

DISTINCTIONS

- *Super Lawyers*®
 - Mid-South Super Lawyers, Securities & Corporate Finance, 2013-2016
- *Best Lawyers in America*®
 - Public Finance Law, 2021-2022

ASSOCIATIONS

- American Bar Association
- National Association of Bond Lawyers
- Novogradac Working Group
- Mississippi Bar

EDUCATION & HONORS

- Southern Methodist University, J.D., *cum laude*, 2001
 - Associate Articles Editor, *The International Lawyer*
- University of Mississippi, B.A., Philosophy and English, 1998

PAPERS, PRESENTATIONS AND PUBLICATIONS

- Panelist, “The Mississippi Story,” Southeastern Regional Opportunity Zone Summit, Jackson, Miss., October 1, 2019.
- Speaker, “QALICB Boot Camp,” Novogradac New Markets Tax Credit Conference, Scottsdale, Ariz., January 2016.
- Author, “Introduction to Community Development Entities,” Annual Development Finance Summit, Council of Development Finance Agencies (CDFA), February 18, 2011.
- Author, “Creative Finance Opportunities for Healthcare Facilities: New Markets Tax Credits Section 45D of the Internal Revenue Code,” Healthcare Financial Management Association Annual Summit, June 9, 2010.
- Co-Author, “Recovery Act Update: New Markets and Other Financing Options Available to Companies,” Pointe Innovation Magazine, Summer 2009.

- Speaker, “Economic Stimulus 101: The American Recovery and Reinvestment Act of 2009,” Annual Development Finance Summit, Council of Development Finance Agencies (CDFA), May 2009.
- Speaker, “NMTC Legal Issues Panel,” New Markets Tax Credit Workshop, Mississippi Development Authority (MDA), May 2008.