

City of Detroit Office of the Chief Financial Officer Office of the Treasury Coleman A. Young Municipal Center 2 Woodward Avenue, Suite 1200 Detroit, MI 48226 Phone: (313) 224-3662

Date: June 27, 2025

To: Detroit City Council

From: Luke Polcyn, Senior Executive, Development & Economic Transformation, City of Detroit Mayor's Office
Bruce Goldman, Chief Assistant Corporation Counsel, City of Detroit Law Department
Nikhil Patel, Deputy CFO - Treasurer, City of Detroit

Subject: Annual Revenue Report

Agreement for the Development of Mack Assembly Plant dated effective June 3, 2019, by and among FCA US LLC, the City of Detroit Brownfield Redevelopment Authority, and the City of Detroit

Background

In June 2019, FCA US LLC ("<u>FCA</u>" or "<u>Stellantis</u>"), the City of Detroit Brownfield Redevelopment Authority ("<u>DBRA</u>"), and the City of Detroit (the "<u>City</u>") entered into an Agreement for the Development of Mack Assembly Plant ("<u>Development Agreement</u>"). All capitalized terms used, but not defined, in this letter shall have the same meaning as set forth in the Development Agreement.

As outlined in Section 10.04 of the Development Agreement, on or before June 1 of each year following the first full calendar year after Stellantis's delivery of the Operations Notice, Stellantis shall deliver to the City and DBRA a Project Data Report. The purpose of this exercise, culminating with submittal of the enclosed Annual City Revenue Report, is to monitor the City's revenue receipts generated by the Project. The terms and conditions of the Development Agreement contemplate Stellantis generating or paying cumulative revenue to the City in the minimum amount of the Monitoring Investment Value, or \$57,400,000.

The first Project Data Report is to cover the period beginning on the Effective Date and running through the end of the first full calendar year after Stellantis's delivery of the Operations Notice. On or before September 1 of each year in which the City receives a Project Data Report from Stellantis, the City is to calculate the Annual City Revenue, based on the Project Data set forth in the Project Data Report provided by Stellantis, and to produce the Annual City Revenue Report and submit same to the Detroit City Council by no later than October 1 of each year. The Annual City Revenue Report shall also include the cumulative Annual City Revenue for all years following the Effective Date.

This reporting is to continue annually until the Monitoring Termination Date, being the earlier of (i) the date on which the cumulative Annual City Revenue stated in all Annual City Revenue Reports equals or exceeds the Monitoring Investment Value; or (ii) twenty nine (29) years from the date of submission by the City of the first Annual City Revenue Report to the Detroit City Council.

Stellantis submitted its Operations Notice on November 29, 2023. The Certificate of Completion was issued by DBRA on December 12, 2023, evidencing DBRA's acknowledgement of satisfaction by FCA of its obligations under the Development Agreement and upon such issuance of the Certificate of Completion, the Development Agreement terminated, except with respect to expressly surviving obligations, which includes, without limitation, submission of the Project Data Report.

On February 13, 2025, Stellantis submitted its Project Data Report for the time period covering June 3, 2019 (the Effective Date) to December 31, 2024.

2025 Annual City Revenue Report

The following table provides the 2025 Annual City Revenue Report generated, verified, and audited by the City of Detroit Office of the Treasury using best effort due diligence. This report encompasses tax revenue generated from tax year 2019 through 2024.

Property tax revenue data was verified and audited using payment data available through the City's property tax administration database and software (BS&A). Income tax revenue data was verified and audited using aggregate withholding and corporate income receipt data from the City Income Tax Administration at the State of Michigan Treasury department, and tax filings provided directly by Stellantis.

Over \$63,900,000 in annual city revenue has been generated by Stellantis from tax year 2019 through 2024, exceeding the Monitoring Investment Value. When the annual city revenue generated by Stellantis exceeds the Monitoring Investment Value, the Monitoring Termination Date occurs.

ANNUAL CITY REVENUE REPORT – FISCAL YEAR 2025

Delivered to the Detroit City Council pursuant to

Section 10.04 of the Agreement for the Development of the Mack Assembly Plant (the "Agreement")

Estimated tax receipts

| Item | Tax year | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|------|---|------------|--------------|--------------|---------------|---------------|---------------|
| А | City income tax received from new employees | \$ 81,177 | \$ 649,285 | \$ 3,638,536 | \$ 5,493,853 | \$ 6,435,720 | \$ 6,856,034 |
| В | Total City income tax received from project construction workers | | | | | | |
| С | Total City income tax received from new employees – suppliers | \$ 170,021 | \$ 204,895 | \$ 799,885 | \$ 544,997 | \$ 0 | N/A |
| D | Net New City Property Taxes received on Mack Assembly Plant | \$ 39,973 | \$ 53,659 | \$ 178,415 | \$ 196,133 | \$ 203,632 | \$ 207,732 |
| Е | Net New City Property Taxes received on JNAP plant property | \$ 8,734 | \$ (106,447) | \$ (189,449) | \$ (190,452) | \$ (202,229) | \$ (196,458) |
| F | Net New City property taxes received on other FCA-owned or leased property | \$ 15,072 | \$ 8,297 | \$17,070 | \$ 45,737 | \$ 372,673 | \$ 435,961 |
| G | FCA Corporate Income tax liability in excess of 2018 liability | \$ 364,864 | N/A | \$ 3,204,713 | \$ 15,557,223 | \$ 19,091,639 | N/A |
| Н | Shared Net Cash Proceeds received by FCA to City under the Agreement | | | | | | |
| Ι | Total current year Annual City Revenue | \$ 679,841 | \$ 809,689 | \$ 7,649,170 | \$ 21,647,491 | \$ 25,901,435 | \$ 7,303,268 |
| J | Cumulative Annual City Revenue | \$ 679,841 | \$ 1,489,531 | \$9,138,701 | \$ 30,786,192 | \$ 56,687,627 | \$ 63,990,895 |
| K | Credits under Section 10.04 of the Agreement | | | | | | |

Submitted on this 27th day of June 2025

City of Detroit

By: Nikhil Patel Its: Deputy CFO – Treasurer