*** § 1134. Exemption from taxes, assessments and certain fees.** 1. It is hereby determined that the creation of the authority and the carrying out of its corporate purposes is in all respects for the benefit of the people of the county and the state and is a public purpose and the authority shall be regarded as performing a governmental function in the exercise of the powers conferred upon it by this title and shall not be required to pay any taxes, special ad valorem levies or special assessments upon any properties owned by it or under its jurisdiction, control or supervision or upon its activities, or any filing, recording or transfer fees or taxes in relation to instruments filed, recorded or transferred by it or on its behalf; provided, however, that any real property acquired by the authority outside of the county shall be exempt from real property taxes, ad valorem levies and special assessments only pursuant to and to the extent provided by an agreement with the governing body of the municipality in which such real property is located. Notwithstanding the foregoing, the authority may enter into an agreement with any municipality in which real property of the authority is located or is to be located, to pay a sum or sums, annually or otherwise, or to provide other consideration to such municipality with respect to such real property.

2. Any bonds issued pursuant to this title, together with the income therefrom, shall be exempt from taxation. The revenues, moneys and other properties and activities of the authority, shall be exempt from all taxes and governmental fees or charges, whether imposed by the state or any municipality, including real estate taxes, franchise taxes, sales taxes or other excise taxes. Any real property owned by the authority outside the county shall be subject to the provisions of subdivision one of this section. The state hereby covenants with the purchasers and with all subsequent holders and transferees of bonds issued by the authority pursuant to this title that the interest thereon shall be exempt from taxation. The state further covenants with the holder of such bonds that all revenues, moneys and other property pledged to secure the payment of such bonds shall at all times be free from taxation, except for real property taxes on real property owned by the authority outside the county. For purposes of this subdivision, the phrase "exempt from taxation" means exempt from direct taxation in conformity with

established judicial interpretation of the tax exempt status of the obligations of the state and its agencies, entities, authorities and political subdivisions and thus, the meaning of such phrase is in conformity with the legislative intent expressed by section twenty-two of chapter one hundred sixty-six of the laws of nineteen hundred ninety-one regarding the tax exempt status of obligations of the state and its agencies.

* NB There are 2 § 1134's