## STATE OF FLORIDA FLORIDA HOUSING FINANCE CORPORATION

ROBERT KING HIGH PRESERVATION
PHASE ON, LLC,

TACOLCY TUSCANY COVE I, LLC,

Intervenor.

, ,	
Petitioner,	
VS.	FHFC No. 2014-062BP Application No. 2014-309S
FLORIDA HOUSING FINANCE CORPORATION,	-rr
Respondent,	
and	

## **MOTION TO INTERVENE**

Pursuant to Rule 28-106.205, Florida Administrative Code, Intervenor, Tacolcy Tuscany Cove I, LLC ("Tuscany Cove"), files this Motion to Intervene in this proceeding.

1. For purposes of this proceeding, counsel for Tuscany Cove and Intervenor's address is:

> Douglas Manson, Esq. Craig Varn, Esq. Manson & Bolves, P.A. 1101 West Swan Avenue Tampa, Florida 33606 Telephone: 813-514-4700 Facsimile: 813-514-4701

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2. On March 28, 2014, Petitioner, Robert King High Preservation Phase One, LLC ("Robert King"), filed a Formal Written Protest and Petition for Administrative Hearing challenging Florida Housing Finance Corporation's ("Florida Housing") determination that it

was ineligible for funding due to its alleged failure to demonstrate Site Control. By its Petition, Robert King is seeking to change this determination, and, if successful would potentially be eligible for funding. If Robert King and other applicants are or determined to be eligible for funding, Tuscany Cove could be ranked outside of the funding range. Therefore, this proceeding may affect Tuscany Cove's substantial interests and Tuscany Cove is entitled to intervene.

3. The undersigned has conferred with counsel for Florida Housing and Robert King who have no objection to Tuscany Cove's intervention in this matter.

WHEREFORE, Tuscany Cove requests entry of an Order granting it intervention in this matter.

RESPECTFULLY SUBMITTED this 21st day of May, 2014.

Michael G. Maida Florida Bar # 0435945

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## **CERTIFICATE OF SERVICE**

I certify that true and correct copy of the foregoing has been served by electronic mail on the Agency Clerk, Florida Housing Finance Corporation, 227 N. Bronough Street, Suite 5000, Tallahassee, Florida 32301 (<a href="mailto:Ashley.Black@floridahousing.org">Ashley.Black@floridahousing.org</a>), Wellington Meffert (<a href="Wellington.Meffert@floridahousing.org">Wellington Meffert</a> (<a href="https://www.wellington.Meffert@floridahousing.org">Wellington Meffert</a> (<a href="mailto:Wellington.Meffert@floridahousing.org">Wellington Meffert</a> (<a href="mailto:Meffert@floridahousing.org">Wellington Meffert</a> (<a href="mailto:Meffert@floridahousing.org">Wellington Meffert</a> (<a href="mailto:Meffert@floridahousing.org">Mellington Meffert@floridahousing.org</a>), and Michael P. Donaldson, (<a href="mailto:mdonaldson@cfjblaw.com">mdonaldson@cfjblaw.com</a>) this 21st day of May, 2014.

Craig Varn