

**BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

MARLYN BEHAVIORAL HEALTH
SYSTEMS, INC. DBA QUALITY
RESOURCE CENTER

Petitioner,
vs.

FHFC Case No. 2017-025BP
RFA No. 2016-115
Application No. 2017-173S

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FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

**FORMAL WRITTEN PROTEST AND
PETITION FOR ADMINISTRATIVE HEARING**

Petitioner, MARLYN BEHAVIORAL HEALTH SYSTEMS, INC. DBA QUALITY RESOURCE CENTER (“MBHS”), pursuant to sections 120.57(3), Florida Statutes (“F.S.”), and Rules 28-110 and 67-60, Florida Administrative Code (“FAC”) hereby files this Formal Written Protest and Petition for Administrative Hearing regarding the review, ranking and scoring decision of Respondent, FLORIDA HOUSING FINANCE CORPORATION (“Florida Housing”) to award funding to responsive bidders pursuant to Request for Application 2016-115 SAIL Financing for Smaller Permanent Supportive Housing Developments for Persons with Special Needs (“the RFA 2016-115”). In support MBHS provides as follows:

1. MBHS is a Florida Not-for-Profit Corporation in the business of providing affordable housing. MBHS is located at 1265 Alumni Way, Jacksonville, Florida 32246.
2. Florida Housing is the allocating agency for the State of Florida that was granted the authority to issue RFA 2016-115 for the purpose of providing much needed permanent

supportive housing. Florida Housing's address is 227 North Bronough Street, Suite 500, Tallahassee, Florida 32301.

3. On November 28, 2016, Florida Housing issued the RFA to offer an estimated \$16,100,000 in State Apartment Incentive Loan (“SAIL”) funding as follows:

This Request for Applications (RFA) is open to Non-Profit Applicants proposing new construction or acquisition and Substantial Rehabilitation to create new Permanent Supportive Housing for Persons with Special Needs as defined in Section 420.0004(13), F.S. Section 420.004(13), F.S., defines “Persons with special needs” as an adult person requiring independent living services in order to maintain housing or develop independent living skills and who has a Disabling Condition; a young adult formerly in foster care who is eligible for services under Section 409.1451(5), F.S.; a survivor of domestic violence as defined in Section 741.28, F.S.; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans’ disability benefits. Applicants may choose at their own discretion to serve “Person with special needs” households that also meet the “Homeless: definition as defined in Section 420.621(5), F.S., although the Corporation is not prioritizing Homeless households with special needs for funding in this RFA.

Florida Housing Finance Corporation (the Corporation) expects to offer an estimated \$16,100,000, comprised of the Persons with Special Needs Demographic portion of the State Apartment Incentive Loan (SAIL) funding appropriated by the 2016 Florida Legislature. This includes funding for ELI gap loans associated with the units that must be set aside for Extremely Low-Income (ELI) Households.

This RFA limits Developments in small counties to between 4 and 15 units, and Developments in medium and large counties to between 10 and 30 units. Group homes, Assisted Living Facilities, and other specialized licensed residential facilities, as well as units within a condominium complex or any single room occupancy developments, are not eligible for funding under this RFA.

The Corporation is soliciting applications from qualified Non-Profit Applicants that commit to provide housing in accordance with the terms and conditions of this RFA, inclusive of all Exhibits of this RFA, applicable laws, rules and regulations, and the Corporation’s generally applicable construction and financial standards.

4. Through the issuance of the RFA, Florida Housing sought to solicit proposals from qualified Applicants that would provide housing consistent with the terms and conditions of the RFA, applicable laws, rules, and regulations.

5. On December 28, 2016, Florida Housing issued a modification to the RFA (See Attachment A)

6. On January 19, 2017, MBHS submitted an Application in Response to the RFA that included information concerning a 23 unit apartment complex in Duval County, Florida, named Veterans Landing. Through the Application, MBHS was requesting \$3,807,000.00 in SAIL funding and \$314,500.00 in ELI funding. MBHS believed that it had satisfied all requirements of the RFA. Florida Housing received seven (7) applications in response to the RFA. (See Attachment B)

7. As the owner of a project seeking funding through the RFA, MBHS is substantially affected by the review, scoring, and ranking of the responses to the RFA. The results of this and related proceedings may affect MBHS's ability to obtain funding through the RFA.

8. Consistent with the primary mission and goal of the RFA, Veterans Landing will provide much needed permanent supportive housing in Duval County. Without the funds provided by the RFA, MBHS will be unable to provide this much needed permanent supportive housing. Accordingly, MBHS's substantial interests are affected by the decisions made by Florida Housing.

9. At Section Four, the RFA lists those items that must be included in an application responding to the RFA. Included in these items at Section Four (A) is information concerning the Applicant, the Developer, and the Development.

10. Of interest in this proceeding, the RFA at Section Four (A)(3)(d) provides as follows:

(d) Principals for the Applicant and for each Developer.

The Application must include the properly completed Principals of the Applicant and Developer(s) Disclosure Form (Form Rev. 08-16) (“Principals Disclosure Form”) that was uploaded as outlined in Section Three above.

The Principals Disclosure Form must identify the Principals of the Applicant and Developer(s) as of the Application Deadline and must include, for each applicable organization structure, ONLY the types of Principals required by subsection 67-48.002(93), F.A.C. A Principals Disclosure form that includes, for any organizational structure, any type of entity that is not specifically included in the Rule definition of Principals, will not be accepted by the Corporation to meet the Mandatory requirement to provide the Principals of the Applicant and Developer(s) Disclosure Form.

To assist Applicants in meeting the Mandatory requirement to provide the Principals Disclosure Form, the Corporation offers a Continuous Advance Review Process which is outlined at <http://www.floridahousing.org/Developers/MultiFamilyPrograms/Competitive/2016-115> (also available by clicking [here](#)). This website also includes samples which may assist the Applicant in completing the required Principals Disclosure Form. A Principals Disclosure Form that was reviewed and approved by the Corporation during the Principals Advance Review Process can be included in the Applicant’s RFA submission, provided it was approved for the type of funding being requested (i.e., Housing Credits or Non-Housing Credits).

11. The primary purpose of the identification of the Principals is to provide Florida Housing with the Financial Beneficiaries of the Proposed Development. With this knowledge, Florida Housing can then determine if any of these Financial Beneficiaries have any outstanding financial obligations for which “an Applicant or Developer or Principal, Affiliate or Financial Beneficiary of an Applicant or a Developer is in arrears to the Corporation or any agent or assignee.” As the RFA provides, if one of these individuals or entities has any outstanding obligation not resolved by the day the Review Committee meets, the Application will be ineligible for funding.

12. On March 9, 2017, consistent with the RFA instructions, the Florida Housing designated Review Committee met and considered the Applications responding to the RFA. At

the meeting, the Review Committee orally listed and manually input the scores for each section of each RFA Response and ultimately made recommendations to the Board of Directors for their consideration. The Review Committee consisted of Florida Housing staff and awarded MBHS 111 out of a possible 125 total points. MBHS achieved the second highest point total of all applicants.

13. During the meeting, the Review Committee determined the eligibility of each Application. The Review Committee determined that the MBHS Application was ineligible for funding based on a single issue. As announced, the issue was allegedly MBHS's failure to include in its Principal Disclosure Information an Executive Director for its Applicant entity. At the conclusion of the meeting, the Review Committee voted to send a funding recommendation to Florida Housing Board of Directors for approval. (See Attachment C)

14. On March 24, 2017, Florida Housing's Board of Directors accepted the Review Committee's ranking and funding recommendations, which included finding MBHS ineligible. Had the MBHS Application been deemed eligible, it would have been in the funding range based on its assigned lottery number and the RFA selection criteria. (See Attachment D)

15. On March 29, 2017, MBHS timely filed its Notice of Intent to Protest the determination that its Application was ineligible. This Formal Written Protest is being timely filed and Florida Housing has waived the bid protest bond requirement for the RFA. As a provider of permanent supportive housing in need of supplemental funding, MBHS's substantial interests are affected by Florida Housing's decision not to award the necessary funding pursuant to the RFA. Without the funding, MBHS will not be able to develop Veterans Landing. (See Attachment E)

16. In response to the RFA requirements, MBHS submitted with its Application the required Principal Disclosure for its Applicant and its Developer. At the First Level Principal

section of the required template MBHS as the Applicant listed the following officers and directors:

Whitaker, Joseph, Officer
Ulerie, Mark, Officer
Ulerie, Jerolynn, Officer
Costlow, Gene, Director
DeVaughn, Tillis, Director
Harris, Rondey, Director

17. As it relates to the sole reason cited by the Review Committee and adopted by the Board for not finding MBHS's Application eligible, Florida Housing has concluded that MBHS did not provide an Executive Director for its Applicant entity. (See Attachment F)

18. Florida Housing's eligibility determination is erroneous for several reasons. First, neither the RFA, the Guidance for Completing the Principal Disclosures for the Applicant Form provided by Florida Housing, nor Rule 67-48.002(93), F.A.C include a specific requirement to list an "Executive Director". Rather, the requirements mandate that the applicant provide its Principals on the required Principal Disclosure Form. (See Attachment G)

19. Specifically Rule 67-48.002(93) F.A.C. in relevant part provides that the following must be disclosed:

(a) With respect to an Applicant that is:

1. A corporation, at the first principal disclosure level, any officer, director, executive director, **or** shareholder of the Applicant corporation . . .

(emphasis added)

20. Indeed the only definition for "Executive Director" is the Executive Director of the Corporation (See Rule 67-48.002(45))

21. MBHS as the Applicant entity has no person officially designated as an Executive Director. However, Mr. Mark Ulerie, is responsible for the operations of MBHS. Mr. Ulerie is the acting CEO/President of MBHS.

22. As required by the RFA, MBHS did indeed provide Florida Housing with its Principal Disclosure of all officers and directors of the Applicant.

23. The problem here is MBHS by signing the Applicant Acknowledgment and Certification Form was required under penalty of perjury to provide accurate information which MBHS intended to do by listing Mr. Ulerie as an Officer which he is, and not an “Executive Director”, which he is not. Again, MBHS has no Executive Director but to the extent it was required, Mr. Ulerie is the equivalent.

24. While MBHS acknowledges the existence of the Q&A updated on November 10, 2016, and the solution it seems to call for, to follow that guidance - i.e. just call the “comparable” officer or director the Executive Director, would have basically required MBHS to ignore the Applicant Certification requirements and provide knowingly incorrect information. This clearly could not have been Florida Housing’s intent.

25. Additionally, while Florida Housing alleges that MBHS’s Application is ineligible for funding because an Executive Director was not designated, a review of the scoring sheets and other Applications submitted reveals that at least one other Application (Application No. 2017-171S) also failed to identify an Executive Director yet that Applicant was not penalized for this alleged deviation. Accordingly, Florida Housing has, at least in this RFA and perhaps others, not been consistent in its eligibility determination. (See Attachment H)

26. MBHS gained no advantage by not specifically identifying an Executive Director for its Applicant entity and even if this is a considered a deviation it should have been waived as a minor irregularity. This is especially true given that the officer who is considered comparable to an Executive Director is indeed identified.

27. MBHS reserves the right to amend this petition as additional documents and facts are discovered.

28. Material issues to be resolved:

- a. Whether the review of MBHS's Application was inconsistent with the RFA requirements, or Florida Housing policies.
- b. Whether Florida Housing's review and actions taken concerning MBHS's Application were arbitrary or capricious, clearly erroneous and contrary to competition.
- c. Whether any alleged deviation in MBHS's Application should be waived as a minor irregularity.

WHEREFORE, MBHS requests that a settlement meeting be scheduled and if settlement is not reached, a hearing be scheduled and ultimately an order be entered determining that Florida Housing's review and scoring of MBHS's Application was contrary to the RFA specifications and to Florida Housing's governing statutes, rules and policies to such an extent as to be arbitrary, capricious, contrary to competition, and clearly erroneous.

Respectfully submitted,

CARLTON, FIELDS, JORDEN BURT, P.A.

/s/ Michael P. Donaldson

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*Attorneys for Marlyn Behavioral Health
Systems, Inc. dba Quality Resource Center*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and a copy of the foregoing has been filed by E-Mail and Hand Delivery to Kate Flemming, Corporation Clerk, Florida Housing Finance Corporation, 227 N. Bronough Street, Suite 5000, Tallahassee, FL 32301, this 10th day of April 2017.

/s/ Michael P. Donaldson

MICHAEL P. DONALDSON

FLORIDA HOUSING FINANCE CORPORATION

Modification of Request for Applications (RFA) 2016-115
SAIL Financing for Smaller Permanent Supportive Housing Developments for Persons with Special
Needs

Pursuant to Rule 67-60.005, F.A.C., Modification of Terms of Competitive Solicitations, Florida Housing hereby modifies Section Four B.5 to read as follows:

5. Tier 1 and Tier 2 Applications:

Applications that ~~qualify as 100% Non-Profit and~~ commit to provide 100 percent of the Developer fee to the Non-Profit entity will be considered Tier 1 Applications. All Applications for proposed Developments that did not qualify as Tier 1 Applications will be considered Tier 2 Applications. Tier 1 Applications will be listed above Tier 2 Applications.

All Tier 1 Applications will be sorted as outlined in Section Four B.6. below. This same sorting process will be performed for Tier 2 Applications.

Pursuant to Rule 67-60.005, F.A.C., Modification of Terms of Competitive Solicitations, Florida Housing hereby modifies Section Four B.7 to read as follows:

7. Selection Process:

- a. The first Tier 1 Application selected for funding will be the highest ranking eligible Small or Medium County Tier 1 Application. If there are no eligible Small or Medium County Tier 1 Applications, the first Application selected for funding will be the highest ranking eligible Small or Medium County Tier 2 Application.
- b. The ~~second next~~ Application selected for funding will be the highest ranking eligible Large County Tier 1 Application. If there are no eligible Large County Tier 1 Applications, the second Application selected for funding will be the highest ranking eligible Large County Tier 2 Application.
- c. After the highest ranking Application(s) based on County size are selected in a. and b. above, the next Application(s) selected for funding will be the highest ranking unfunded Tier 1 Applications, regardless of location, that (i) can meet the Funding Test, and (ii) has a County Award Tally that is less than or equal to any other eligible unfunded Tier 1 Applications that also meet the Funding Test. If funding remains and none of the eligible unfunded Tier 1 Applications can meet the Funding Test, the selection process will continue with the highest ranking eligible Tier 2 Applications(s) that (i) can meet the Funding Test, and (ii) has a County Award Tally that is less than or equal to any other eligible unfunded Tier 2 Applications that also meet the Funding Test.
- d. If funding remains and none of the eligible unfunded Applications can meet the Funding Test, no further Applications will be considered for funding. Any remaining funding will be distributed as approved by the Board.

Submitted By:

Ken Reecy
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Application Number	Name of Development	County	County Site	Name of Contact Person	Name of Developer	Total Request Amount	Eligible For Funding?	Tier level	Total Points	Qualifying Financial Assistance Preference	Per Unit Construction Funding Preference	SAIL Request Per Unit	SAIL Request as % of TDC Preference	Florida Job Creation Preference	Lottery Number
Eligible Applications															
2017-1695	Ozamaa Village III	Pasco	M	Brian M. Smith	Society of St. Vincent de Paul South Pinellas, Inc.; GHD Construction Services, Inc.	5,000,000.00	Y	1	106	N	Y	\$166,666.67	N	Y	2
2017-1725	The Ranch at Pinellas Park	Pinellas	L	Jack D Humburg	Pinellas Affordable Living, Inc.; Boley Centers, Inc.	4,116,789.00	Y	1	113	Y	Y	\$155,607.56	Y	Y	3
Ineligible Applications															
2017-1705	Pine Breeze Apartments	Flagler	M	Brian M. Smith	Workforce Housing Ventures, Inc.; GHD Construction Services, Inc.	5,000,000.00	N	1	104	N	Y	\$166,666.67	N	Y	6
2017-1715	Ritz Reserve Phase 2	Marion	M	Susan A Tracy	Volunteers of America of Florida, Inc.	3,439,989.00	N	1	93	Y	Y	\$121,099.59	Y	Y	7
2017-1735	VETERANS LANDING	Duval	L	JENNA L EMMONS	ABILITY HOUSING, INC.	4,121,500.00	N	1	111	N	Y	\$165,521.74	N	Y	4
2017-1745	Magnolia Commons	Miami-Dade	L	Stephanie W Baldwin	Opallocka Community Development Corporation, Inc.	4,431,400.00	N	1	75	N	Y	\$205,000.00	Y	Y	1
2017-1755	Magnolia North 2145 Apartments	Miami-Dade	L	Stephanie W Baldwin	Opallocka Community Development Corporation, Inc.	3,317,000.00	N	1	75	N	Y	\$205,000.00	Y	Y	5

On March 24, 2017, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion to adopt the scoring results above.

Any unsuccessful Applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., Rule Chapter 28-110, F.A.C., and Rule 67-60.009, F.A.C. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

Scoring Items	Mandatory, Eligibility Requirement, Point Item, or Tie-Breaker?	Contributor/ Reporter	2017-169S	2017-170S	2017-171S	
			Ozanam Village III	Pine Breeze Apartments	Ritz Reserve Phase 2	
Point Items						
4.b. Operating /Managing Permanent Supportive Housing Experience (maximum of 40 points)	Point Item	Bill A	32	32	27	
10.a. Access to Groceries, Education, Household Shopping and Employment (Maximum of 20 points)	Point Item	John T	18	17	16	
10.b. Access to Specific Healthcare/Supportive Service Needs of Intended Residents (Maximum of 30 points)	Point Item	Elaine	25	25	23	
11. Approach Toward Income and Credit Status of Intended Individuals and Families (Maximum of 15 points)	Point Item	Bill A	13	12	10	
12. Tenant Selection (Maximum of 20 points)	Point Item	Elaine	18	18	17	
Total Points Awarded	maximum of 125		106	104	93	
Mandatory and Eligibility Items						
Submission Requirements Met (Section Three A and Section Five)	Eligibility	Karla	Y	N	Y	
2.a. Selection of at least 1 Persons with Special Needs population	Mandatory	Elaine	Y	Y	Y	
2.b. Description of demographic provided	Mandatory		Y	Y	Y	
3.a. Applicant Name provided	Mandatory	Karla	Y	Y	Y	
3.b. Evidence that Applicant is a legally formed entity qualified to do business in the state of Florida provided	Mandatory		Y	Y	N	
3.c. Applicant qualifies as a Non-Profit Applicant	Eligibility		Y	Y	N	
3.d. Principals of the Applicant and Developer(s) Disclosure form provided	Mandatory		Y	Y	Y	
3.e. Contact information provided	Mandatory		Y	Y	Y	
4.a.(1) Developer names provided	Mandatory		Y	Y	Y	
4.a.(2) Evidence that Developer is a legally formed entity provided	Mandatory		Y	Y	N	
4.a.(3) Developer prior experience chart provided	Mandatory		Y	Y	Y	
5.a. Development name provided	Mandatory		Bill C	Y	Y	Y
5.b.(1) Development county provided	Mandatory			Y	Y	Y
5.b.(2) Development address provided	Mandatory	Y		Y	Y	
5.c. Development Category provided	Mandatory	Y		Y	Y	
5.d. Development Type provided	Mandatory	Y		Y	Y	
5.f. Total Number of units in Development provided	Mandatory	Y		Y	Y	
5.g. Unit Mix provided	Mandatory	Y	Y	Y		
7. Evidence of Site Control provided	Mandatory	Rachael	Y	Y	Y	
8.a. Status of site plan/plat approval demonstrated	Mandatory	Bill C	Y	Y	Y	
8.b. Appropriate zoning demonstrated	Mandatory		Y	Y	Y	
8.c. Availability of electricity demonstrated	Mandatory		Y	Y	Y	
8.d. Availability of water demonstrated	Mandatory		Y	Y	Y	
8.e. Availability of sewer demonstrated	Mandatory		Y	Y	Y	
8.f. Availability of roads demonstrated	Mandatory		Y	Y	Y	
13.a. SAIL Request Amount provided	Mandatory	Kevin T	Y	Y	Y	
13.c. Development Cost Pro Forma free from shortfalls	Mandatory		Y	Y	Y	
TDC less than or equal to TDC Limitation (Item C of Exhibit D)	Eligibility		Y	Y	Y	
Previous funding requirements met (Section Four, B.2.)	Eligibility		Y	Y	Y	
Financial Arrears Met (Section Five)	Eligibility		Kenny	Y	Y	N
Minimum Total Score of 65 is met?	Eligibility	Yes or No	Y	Y	Y	
All Mandatory Elements Met?	Eligibility	Yes or No	Y	Y	N	
All Eligibility Requirements Met?	Eligibility	Yes or No	Y	N	N	
Tie-Breaker Items						
Tier Level (Section Five, D.1.)	Tie-Breaker	Kevin T	1	1	1	
13.b. Qualifying Financial Assistance Funding Preference (Y/N)	Tie-Breaker		N	N	Y	
13.e. Per Unit Construction Funding Preference (Y/N)	Tie-Breaker		Y	Y	Y	
Florida Job Creation Preference (Section Five, D.5.) (Y/N)	Tie-Breaker		Y	Y	Y	
Lottery Number	Tie-Breaker	Inspector General	2	6	7	

Scoring Items	2017-1725	2017-1735	2017-1745	2017-1755	Count of Applications that did not meet requirement
Development Name	The Ranch at Pinellas Park	VETERANS LANDING	Magnolia Commons	Magnolia North 2145 Apartments	
Point Items					
4.b. Operating /Managing Permanent Supportive Housing Experience (maximum of 40 points)	38	38	29	29	
10.a. Access to Groceries, Education, Household Shopping and Employment (Maximum of 20 points)	18	17	14	14	
10.b. Access to Specific Healthcare/Supportive Service Needs of Intended Residents (Maximum of 30 points)	26	24	15	15	
11. Approach Toward Income and Credit Status of Intended Individuals and Families (Maximum of 15 points)	13	14	8	8	
12. Tenant Selection (Maximum of 20 points)	18	18	9	9	
Total Points Awarded	113	111	75	75	
Mandatory and Eligibility Items					
Submission Requirements Met (Section Three A and Section Five)	Y	Y	Y	Y	1
2.a. Selection of at least 1 Persons with Special Needs population	Y	Y	Y	Y	0
2.b. Description of demographic provided	Y	Y	Y	Y	0
3.a. Applicant Name provided	Y	Y	Y	Y	0
3.b. Evidence that Applicant is a legally formed entity qualified to do business in the state of Florida provided	Y	Y	Y	Y	1
3.c. Applicant qualifies as a Non-Profit Applicant	Y	Y	N	N	3
3.d. Principals of the Applicant and Developer(s) Disclosure form provided	Y	N	Y	Y	1
3.e. Contact information provided	Y	Y	Y	Y	0
4.a.(1) Developer names provided	Y	Y	Y	Y	0
4.a.(2) Evidence that Developer is a legally formed entity provided	Y	Y	Y	Y	1
4.a.(3) Developer prior experience chart provided	Y	Y	Y	Y	0
5.a. Development name provided	Y	Y	Y	Y	0
5.b.(1) Development county provided	Y	Y	Y	Y	0
5.b.(2) Development address provided	Y	Y	Y	Y	0
5.c. Development Category provided	Y	Y	Y	Y	0
5.d. Development Type provided	Y	Y	Y	Y	0
5.f. Total Number of units in Development provided	Y	Y	Y	Y	0
5.g. Unit Mix provided	Y	Y	Y	Y	0
7. Evidence of Site Control provided	Y	Y	Y	Y	0
8.a. Status of site plan/plat approval demonstrated	Y	Y	Y	Y	0
8.b. Appropriate zoning demonstrated	Y	Y	Y	Y	0
8.c. Availability of electricity demonstrated	Y	Y	Y	Y	0
8.d. Availability of water demonstrated	Y	Y	Y	Y	0
8.e. Availability of sewer demonstrated	Y	Y	Y	Y	0
8.f. Availability of roads demonstrated	Y	Y	Y	Y	0
13.a. SAIL Request Amount provided	Y	Y	Y	Y	0
13.c. Development Cost Pro Forma free from shortfalls	Y	Y	Y	N	1
TDC less than or equal to TDC Limitation (Item C of Exhibit D)	Y	Y	Y	Y	0
Previous funding requirements met (Section Four, B.2.)	Y	Y	Y	Y	0
Financial Arrears Met (Section Five)	Y	Y	Y	Y	1
Minimum Total Score of 65 is met?	Y	Y	Y	Y	0
All Mandatory Elements Met?	Y	N	Y	N	3
All Eligibility Requirements Met?	Y	N	N	N	5
Tie-Breaker Items					
Tier Level (Section Five, D.1.)	1	1	1	1	
13.b. Qualifying Financial Assistance Funding Preference (Y/N)	Y	N	N	N	5
13.e. Per Unit Construction Funding Preference (Y/N)	Y	Y	Y	Y	0
Florida Job Creation Preference (Section Five, D.5.) (Y/N)	Y	Y	Y	Y	0
Lottery Number	3	4	1	5	

RFA 2016-115 – Recommendations

Total SAIL Funding	16,100,000
Total SAIL Allocated	9,116,789
Total SAIL Remaining	6,983,211

Application Number	Name of Development	County	County Size	Name of Contact Person	Name of Developer	Total Request Amount	Eligible For Funding?	Tier level	Total Points	Qualifying Financial Assistance Preference	SAIL Request Per Unit	SAIL Request as % of TDC Preference	Florida Job Creation Preference	Lottery Number
Small or Medium County Application														
2017-1685	Ozanam Village III	Pasco	M	Brian M. Smith	Society of St. Vincent de Paul South Pinellas, Inc.; GHD Construction Services, Inc.	5,000,000.00	Y	1	106	N	\$166,666.67	N	Y	2
Large County Application														
2017-1725	The Ranch at Pinellas Park	Pinellas	L	Jack D Humburg	Pinellas Affordable Living, Inc.; Beley Centers, Inc.	4,116,789.00	Y	1	113	Y	\$155,607.56	Y	Y	3

RFA 2016-115 – Recommendations

Total SAIL Funding	16,100,000
Total SAIL Allocated	9,116,789
Total SAIL Remaining	6,983,211

Application Number	Name of Development	County	County Size	Name of Contact Person	Name of Developer	Total Request Amount	Eligible For Funding?	Tier level	Total Points	Qualifying Financial Assistance Preference	SAIL Request Per Unit	SAIL Request as % of TDC Preference	Florida Job Creation Preference	Lottery Number
Small or Medium County Application														
2017-1695	Ozmaam Village III	Pasco	M	Brian M. Smith	Society of St. Vincent de Paul South Pinellas, Inc.; GHD Construction Services, Inc.	5,000,000.00	Y	1	106	N	\$156,656.67	N	Y	2
Large County Application														
2017-1725	The Ranch at Pinellas Park	Pinellas	L	Jack D Humburg	Pinellas Affordable Living, Inc.; Boiley Centers, Inc.	4,116,789.00	Y	1	113	Y	\$155,607.56	Y	Y	3

On March 24, 2017, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion and staff recommendation to select the above Applications for funding and invite the Applicant to enter credit underwriting.

Any unsuccessful Applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., Rule Chapter 28-110, F.A.C., and Rule 67-60.009, F.A.C. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

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March 29, 2017

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Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301-1329

VIA HAND DELIVERY AND EMAIL
Kate.flemming@floridahousing.org

NOTICE OF INTENT TO PROTEST

Re: RFA 2016-115

Dear Ms. Flemming:

On behalf of Marlyn Behavioral Health Systems, Inc. dba Quality Resource Center (2017-173S), we hereby give notice of our intent to protest the Award Notice and scoring and ranking of RFA 2016-115 issued by Florida Housing on March 24, 2017 at 9:29 a.m., concerning SAIL Financing for Smaller Permanent Supportive Housing Developments for Persons with Special Needs. (See Attached)

Sincerely,



Michael P. Donaldson

MPD/rb

Enclosure

RFA 2016-115 – All Applications

Application Number	Name of Development	County	Country Size	Name of Contact Person	Name of Developer	Total Request Amount	Eligible For Funding?	Tier level	Total Points	Qualifying Financial Assistance Preference	Per Unit Construction Funding Preference	SAIL Request Per Unit	SAIL Request as % of TDC Preference	Florida Job Creation Preference	Lottery Number
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Eligible Applications

2017-1695	Ozanam Village III	Pasco	M	Brian M. Smith	Society of St. Vincent de Paul South Pinellas, Inc.; GHD Construction Services, Inc.	5,000,000.00	Y	1	106	N	Y	\$166,666.67	N	Y	2
2017-1725	The Ranch at Pinellas Park	Pinellas	L	Jack D Humburg	Pinellas Affordable Living, Inc.; Boley Centers, Inc.	4,116,789.00	Y	1	113	Y	Y	\$155,607.56	Y	Y	3

Ineligible Applications

2017-1705	Fine Breeze Apartments	Flagler	M	Brian M. Smith	Workforce Housing Ventures, Inc.; GHD Construction Services, Inc.	5,000,000.00	N	I	104	N	Y	\$166,666.67	N	Y	6
2017-1715	Rdz Reserve Phase 2	Manion	M	Susan A Tracy	Volunteers of America of Florida, Inc.	3,439,989.00	N	1	93	Y	Y	\$121,099.59	Y	Y	7
2017-1735	VETERANS LANDING	Duval	L	JENINA L EMMONS	ABILITY HOUSING, INC.	4,121,500.00	N	1	111	N	Y	\$185,521.74	N	Y	4
2017-1745	Magnolia Commons	Miami-Dade	L	Stephanie W Baldwin	Opa-locka Community Development Corporation, Inc.	4,431,400.00	N	1	75	N	Y	\$205,000.00	Y	Y	1
2017-1755	Magnolia North 2145 Apartments	Miami-Dade	L	Stephanie W Baldwin	Opa-locka Community Development Corporation, Inc.	3,317,000.00	N	1	75	N	Y	\$205,000.00	Y	Y	5

On March 24, 2017, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion to adopt the scoring results above.

Any unsuccessful Applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., Rule Chapter 28-110, F.A.C., and Rule 67-60.009, F.A.C. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

Scoring Items	Mandatory, Eligibility Requirement, Point Item, or Tie-Breaker?	
Submission Requirements Met (Section Three A and Section Five)	Eligibility	170S - The required Application fee was not paid as of the Application Deadline.
3.a. Applicant Name provided	Mandatory	No exceptions
3.b. Evidence that Applicant is a legally formed entity qualified to do business in the state of Florida provided	Mandatory	171S - The evidence provided was not for the Applicant.
3.c. Applicant qualifies as a Non-Profit Applicant	Eligibility	171S - IRS Form 990 does not include "to foster low-income housing" in the purpose. 174S - The non-profit evidence provided was not for the Applicant entity 175S - The non-profit evidence provided was not for the Applicant entity.
3.d. Principals of the Applicant and Developer(s) Disclosure form provided	Mandatory	173S - The Executive Director was not provided for the Applicant entity.
3.e. Contact information provided	Mandatory	No exceptions
4.a.(1) Developer names provided	Mandatory	No exceptions
4.a.(2) Evidence that Developer is a legally formed entity provided	Mandatory	171S - The evidence provided was not for the Developer entity.
4.a.(3) Developer prior experience chart provided	Mandatory	No exceptions


 Karla Brown

This template utilizes drop-down menus for many of the input cells to present a list of appropriate responses. The default for all of them is “<Select an option>.” The process to enter a response in these cells is to first select the applicable cell, select the down arrow attached to the right side of the cell, choose one of the responses from the list in the drop-down menu box. Sometimes the list of available responses is longer than what is displayed by the drop-down menu box. If that is the case, there will be a scroll bar available on the right side of the box to scroll down the list. You must choose one of the responses in the list when completing a cell with a drop-down menu.

There may be times when you want to use the same option in a list for multiple lines. Instead of making a selection from the list in each of these lines separately, you can copy the one cell with the appropriate selection to all other applicable cells (but only in the same column of that section). For instance, if you need to list five officers of a corporation, you could select the “Officer” option from the drop-down list in the first applicable cell and then copy that cell to the other four cells in that same section that should also be listed as an officer.

There are notes provided below to provide specific guidance related to identifying Principals that are Investors (or their placeholder), managers of LLCs, Trusts, and Natural Persons.

To assist Applicants in meeting the Principals disclosure requirements, the Corporation offers a courtesy Advance Review Process. Under this process, the Corporation will review the Applicant’s completed form and provide feed-back. Applicants are not required to participate in the Advance Review Process in order to submit an Application in response to any RFA. This process is provided solely as a courtesy by the Corporation.

The Advance Review process is outlined on the Corporation’s Website. One location is <http://www.floridahousing.org/Developers/MultiFamilyPrograms/Competitive/2016-109/OtherInformation/> (also accessible by clicking on this cell).

Guidance for completing the Principal Disclosures for Applicant Form

Be sure you have the ‘Applicant_Principals’ worksheet tab open.

1. **Select the organizational structure for the Applicant entity.** Enter the organizational structure for the Applicant by selecting a response from the drop-down menu in cell F4. The menu options are: Limited Partnership, Limited Liability Company, For-Profit Corporation and Non-Profit Corporation.
2. **Provide the name of the Applicant.** Type the name of the Applicant into cell F7. The text in the cell will wrap automatically if the Applicant's name is longer than one line.

First Principal Disclosure Level (Applicant):

[Click Here to Return to Applicant 1st Level](#)

3. **Select Type of Principal of Applicant.** To enter information within the First Principal Disclosure Level section, start by selecting a response from the drop-down menu for the first Principal you want to document. The first one will be in cell F13. This column has a header of “Select Type of Principal of Applicant.” There are 20 lines available to identify the First Level Principals. Each unique Principal must have its own line. The menu options are General Partner, Non-Investor LP and Investor LP for Applicants that are a Limited Partnership; Manager, Non-Investor Member and Investor Member for Applicants that are a Limited Liability Company; Shareholder, Officer, Director and Executive Director for Applicants that are either a For-Profit Corporation or a Non-Profit Corporation.

All Applicants seeking Housing Credits must list one of the **Investor entities**. The menu options that begin with "Investor" are reserved for the entity that is associated with providing the HC equity (i.e., HC syndicator or HC investor), or the entity acting as a placeholder for application purposes. Any entity identified in the First Principal Disclosure Level as an Investor will not be required to complete any lower Principal Level for that Principal.

If the Applicant or the Principal of the Applicant is identified as a Limited Liability Company, a manager-type entity must be identified (unless the Principal is identified as a Sole Member, which is a menu option in the Second and Third Principal Disclosure Levels and will assume to be the managing entity). As in all menu options herein that offer the selection option of "Manager," that term is not specific as to whether or not the manager is a Member or a Non-Member. Some later menus offer more than one manager option, but the simple "Manager" option here remains a non-descript manager option.

If a **Trust** is part of the Applicant Principal Disclosure process, then the Trust must be identified at the second Principal Disclosure Level with the **Trustee** and any **Beneficiary** (who is in the majority) identified in the Third Principal Disclosure Level.

As a reminder, a **natural person** must be identified by the Third Principal Level and a natural person means a human being. If two or more natural persons own an entity together (jointly), possibly through some sort of asset protection structure such as 'tenants by the entireties,' then each natural person in this joint ownership structure must be listed separately and identified with the appropriate structure.

If the Type of Principal selected is inappropriate for the Type of Applicant selected, the font in the Type of Principal cell will turn red, bold and be italicized as an indicator.

4. **Feedback Regarding Data Entries.** There is a Feedback Regarding Data Entries column (column N) available to guide you with your responses. If you have chosen a Type of Principal of Applicant that is appropriate for the organizational structure that you chose for the Applicant, the Feedback Regarding Data Entries column will confirm that selection is valid. If the selection is not appropriate, the Feedback Regarding Data Entries column will confirm that as well (in both comment and font). This column is not to confirm you have fully and/or correctly completed the data entries, but to simply let you know if appropriately related selections have been made.
5. **Enter Name of First Level Principal.** Type the name of the First Level Principal being identified in column H. When entering the name of a Principal, please enter the full legal name of a legal entity or, if it is a natural person, it is requested you first enter the persons last name, followed by a comma, then the full first name (i.e., not a simple initial) and at least the initial of the middle name, and finally any applicable suffix after another comma. For instance, Robert Benjamin Smith, Jr. would be entered Smith, Robert B., Jr.
6. **Select organizational structure of First Level Principal identified.** Lastly, identify the organizational structure of that Principal by selecting a response from the drop-down menu in column J. The menu options are Limited Partnership, Limited Liability Company, For-Profit Corporation, Non-Profit Corporation, Trust and Natural Person. If the Type of Principal being identified is an Officer, Director, or Executive Director, then the organizational structure of that Principal must be identified as a Natural Person.

The Feedback Regarding Data Entries column will inform you whether or not you need to further document that Principal in the next Principal Disclosure Level. If the Organizational Structure of the Principal selected is inappropriate for the Type of Principal selected, the font in the Organizational Structure of the Principal cell will turn red, bold and be italicized as an indicator.

7. **% Ownership of Applicant.** There is a column provided (column L) that can be used to inform Florida Housing of each Principal's percent ownership of Applicant; however, it is hidden and blocked during the Application process. If an Applicant is invited into credit underwriting, the form submitted with the Applicant's Application will be returned to the Applicant with that column made available so it can be completed and returned once again to Florida Housing.

Within the First Principal Disclosure Level, enter the percentage of ownership of the Applicant for each Principal listed. If that column totals to 100%, then a "✓" symbol will appear above the column header (cell L10). If it does not equal 100%, then a "⊕" symbol will appear above the column header. If properly completed, the column will total 100%.

To the right of that column (column K), there will appear additional indicators or symbols relative to the ownership of each Principal listed in the First Principal Disclosure Level. If the percentage(s) of ownership provided on the Second Principal Disclosure Level for each non-natural person or non-investor Principal listed in the First Level equals 100%, then a "✓" symbol will appear (in column K). If it does not equal 100%, then a "⊕" symbol will appear. If the First Level Principal is either a natural person or an investor, then an "x" symbol will appear (indicating no ownership percentages are required in the Second Level).

Second Principal Disclosure Level (Applicant):

[Click Here to Return to Applicant 2nd Level](#)

8. You can begin to enter responses in the Second Principal Disclosure Level once at least one Principal has been identified in the First Principal Disclosure Level. As such, you can enter one Principal at the First Level and then drop down to the Second Level to document that Principal, or you can complete all of the Principals at the First Level before going down to the Second Level.
9. **Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being identified.** To document a Principal in the Second Principal Disclosure Level, first identify the First Level Principal for which you are documenting by selecting its First Level Entity # from the drop-down menu in column B (cell B40 being the first). The lists in the drop-down menus for this column do not populate until you enter a Principal name in the prior Principal Level. These lists will be created by combining the First Level Entity # and the name of the First Level Principal.

As a note, if the First Level Principal is a natural person, the list will provide a special line ("N/A (Natural Person)") for that Principal to indicate that you do not need to document a Principal at a lower Principal Level for that natural person. Remember, you may need to scroll down the drop-down menu list to find all of the First Level Principal Entity # selection options. In addition, Investor Principals entered at the First Principal Disclosure Level will appear with its own special line ("N/A (Investor)") in this drop-down menu, as no further disclosure of the investor is required.

10. **Second Level Entity #.** After identifying the First Level Principal for which you are documenting in the Second Principal Disclosure Level, column D will self-populate, creating a Second Level Entity # for the Principal you are now documenting. This Second Level Entity # will be used to assist with completing the Third Level Principal Disclosure Level.
11. **Select the type of Principal being associated with the corresponding First Level Principal Entity.** This is similar to the process you did for selecting the type of Principal of Applicant as provided in #3 above. Each Second Level Principal of all the Principal entities provided in the First Principal Disclosure Level must be listed separately. If an entity or natural person serves in the capacity of multiple Principals, each instance must be listed separately.

The menu options are General Partner and Limited Partner for any Principal identified as a Limited Partnership; Manager, Member, Managing Member and Sole Member for any Principal identified as a Limited Liability Company; Shareholder, Officer, Director and Executive Director for any Principal identified as either a For-Profit Corporation or a Non-Profit Corporation; Trustee and Beneficiary for any Principal identified as a Trust. There are 60 lines available to document all Principals within the Second Principal Disclosure Level. See #3 above for discussion regarding Managers of an LLC.

- 12. **Feedback Regarding Data Entries.** If you have chosen a Type of Principal of a First Level Principal that is appropriate for the organizational structure of that First Level Principal, the Feedback Regarding Data Entries column will confirm that selection is valid. If the selection is not appropriate, the Feedback Regarding Data Entries column will confirm that as well. This column is not to confirm you have fully and/or correctly completed the data entries, but to let you know if appropriately related selections have been made.
- 13. **Enter Name of Second Level Principal.** Type the name of the Second Level Principal being identified, following the same instructions of entering the name of a Principal as provided in #5 above.
- 14. **Select organizational structure of Second Level Principal identified.** Lastly, identify the organizational structure of that Principal by selecting a response from the drop-down menu. The menu options here are the same as those identified in #6 above. The Feedback Regarding Data Entries column will inform you whether or not you need to further document that Principal in the final Principal Disclosure Level.
- 15. Intentionally left blank.

% Ownership of Applicant. There is a column provided that can be used to inform Florida Housing of each Principal's percent ownership of Applicant; however, it is hidden and blocked during the Application process.

Completing the % ownership in this Second Level will demonstrate the ownership by the Principal being identified in this Level for the First Level Principal Entity # provided in column B. If the % ownership of all identical First Level Principal Entity #s identified in this Level (column B) equals 100%, then a "✓" will appear above in the First Level, column K, next to the respective First Level Principal referenced in the Second Level. If the ownership is less than 100%, then a "⊙" will appear instead. These instructions have previously been mentioned in #7 above.

Likewise, for the Principals identified in this Second Level (column H) that are not natural persons, their ownership must be documented in the Third Principal Disclosure Level. The indicators of "✓", "⊙" and "✗" will appear in column K of the Second Principal Disclosure Level in the same manner as prescribed in #7 above.

Third Principal Disclosure Level (Applicant):

[Click Here to Return to Applicant 3rd Level](#)

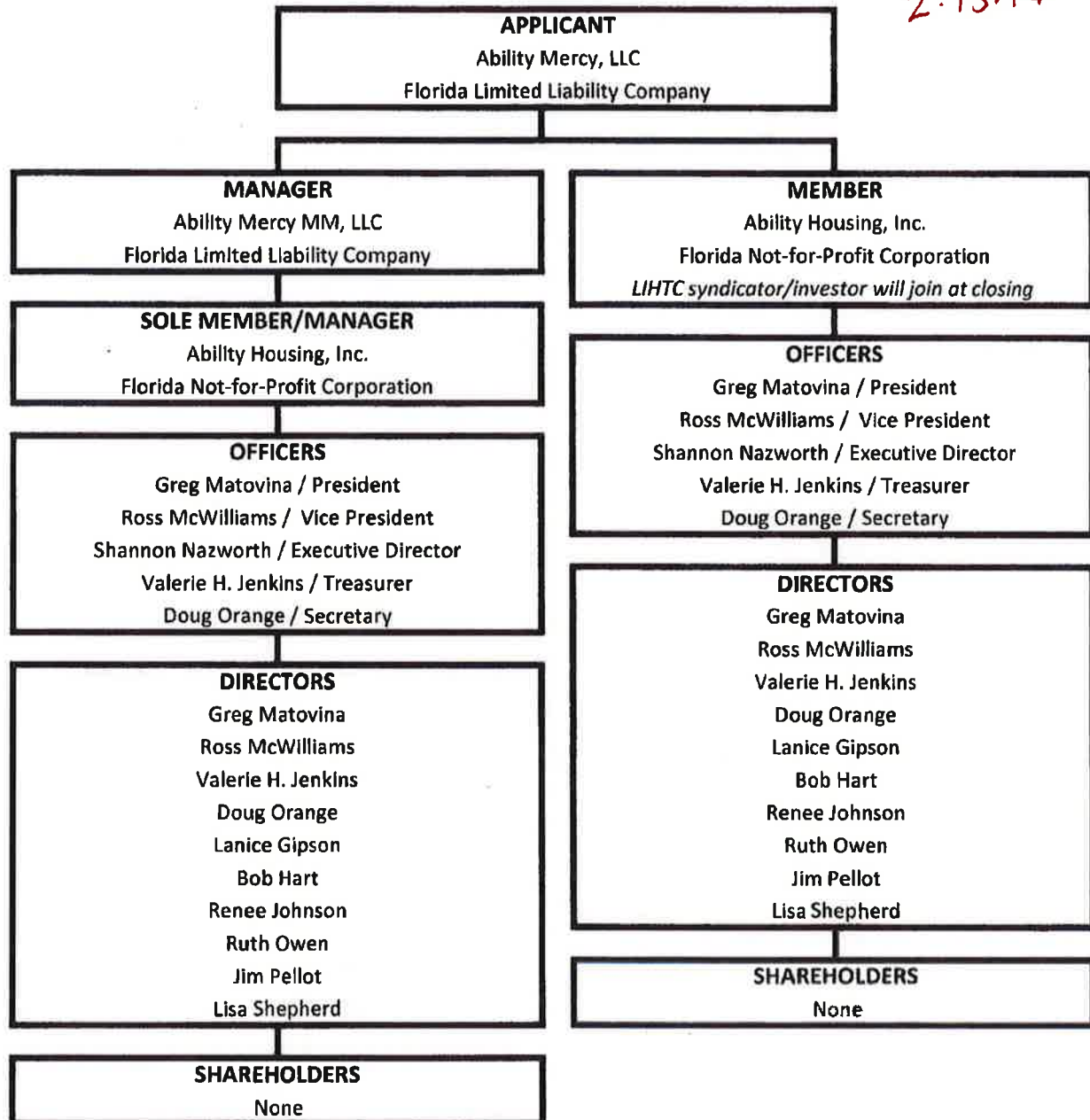
- 16. You can begin to enter responses in the Third Principal Disclosure Level once at least one Principal (that is not a natural person) has been identified in the Second Principal Disclosure Level. As such, you can enter one Principal at the Second Level and then drop down to the Third Level to document that Principal, or you can complete all of the Principals at the Second Level before going down to the Third Level.

17. **Select the corresponding Second Level Principal Entity # from above for which the Third Level Principal is being identified.** To document a Principal in the Third Principal Disclosure Level, first identify the Second Level Principal for which you are documenting by selecting its Second Level Entity # from the drop-down menu in column B. The list in the drop-down menu for this column follow the same process as provided in #9 above.
18. **Select the type of Principal being associated with the corresponding Second Level Principal Entity.** This is the same process you did for selecting the type of Principal for the Second Level as provided in #11 above and has the same menu options. Each Principal of all Principal entities provided in the Second Principal Disclosure Level must be listed separately. If an entity or natural person serves in the capacity of multiple Principals, each instance must be listed separately. There are 60 lines available to document all Principals within the Third Principal Disclosure Level. Each Principal in the Third Principal Level can only be a natural person.
19. **Feedback Regarding Data Entries.** The same type of guidance is provided in this column of this section as mentioned above.
20. **Enter Name of Third Level Principal.** Type the name of the Third Level Principal being identified, following the same instructions of entering the name of a Principal as provided previously.
21. Intentionally left blank.

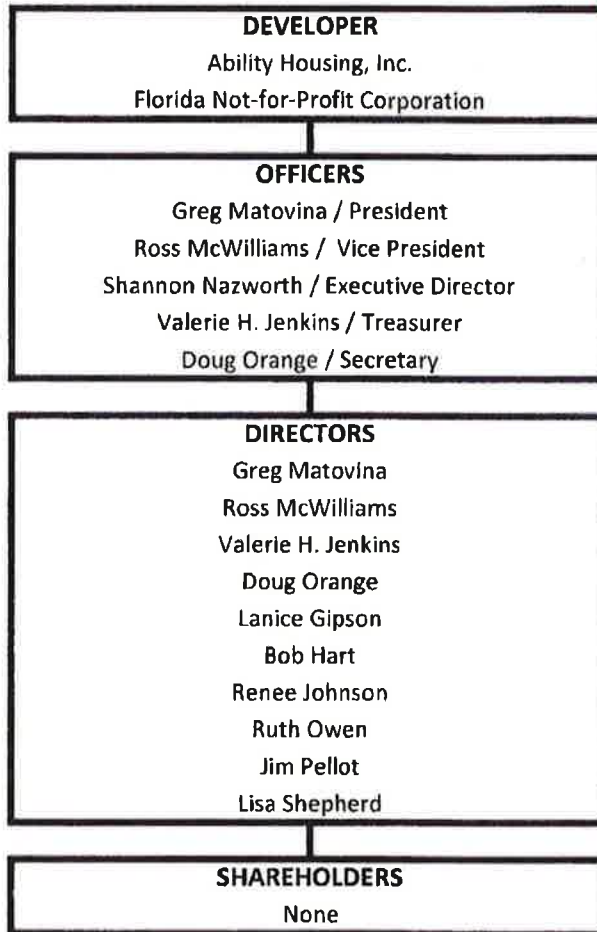
% Ownership of Applicant. There is a column provided that can be used to inform Florida Housing of each Principal's percent ownership of Applicant; however, it is hidden and blocked during the Application process.

The purpose of indicating the % ownership in this Third Level is to document the ownership by the Principal being identified in this Level for the Second Level Principal Entity # provided in column B. Indicators will appear in the Second Principal Disclosure Level in the same manner as described in #7 and #15 above.

Approved
FHFC Advance Review
 2.15.14



Approved
FHFC Advance Review
2.15.14



Principal Disclosures for Applicant

Select the organizational structure for the Applicant entity:

The Applicant is a: Non-Profit Corporation

Provide the name of the Applicant Non-Profit Corporation:

Volunteers of America of Florida, Inc.

First Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for the Applicant](#)

First Level Entity #	Select Type of Principal of Applicant	Enter Name of First Level Principal	Select organizational structure of First Level Principal Identified
1.	Officer	Janet Stringfellow	Natural Person
2.	Officer	David Houslan	Natural Person
3.	Officer	Alex Bueno	Natural Person
4.	Officer	Edwin Shepherdson	Natural Person
5.	Officer	Maurice Harvey	Natural Person
6.	Director	Kristin Andersen	Natural Person
7.	Director	Robert Atkins	Natural Person
8.	Director	Helen Gutierrez	Natural Person
9.	Director	Stephen Tabano	Natural Person
10.	Director	Allison Tutwiler	Natural Person
11.	Director	Wilbert Vaughn	Natural Person
12.	<Select an option>		<Select an option>
13.	<Select an option>		<Select an option>
14.	<Select an option>		<Select an option>
15.	<Select an option>		<Select an option>
16.	<Select an option>		<Select an option>
17.	<Select an option>		<Select an option>
18.	<Select an option>		<Select an option>
19.	<Select an option>		<Select an option>
20.	<Select an option>		<Select an option>

Second Principal Disclosure Level:

Volunteers of America of Florida, Inc.

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for the Applicant](#)

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being Identified

Second Level Entity #

Select the type of Principal being associated with the corresponding First Level Principal Entity

Enter Name of Second Level Principal

Select organizational structure of Second Level Principal Identified

<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>

Principal Disclosures for Applicant

<Select a #>	<Select an option>	Natural Person
<Select a #>	<Select an option>	Natural Person

Principal Disclosures for the Developer

How many Developers are part of this Application structure?

1

Select the organizational structure for the Developer entity:

The Developer is a: Non-Profit Corporation

Provide the name of the Developer Non-Profit Corporation:

Volunteers of America of Florida

First Principal Disclosure Level:

Volunteers of America of Florida

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	Officer	Janet Stringfellow	Natural Person
2.	Officer	David Houssian	Natural Person
3.	Officer	Alex Bueno	Natural Person
4.	Officer	Edwin Shepherdson	Natural Person
5.	Officer	Maurice Harvey	Natural Person
6.	Director	Kristin Andersen	Natural Person
7.	Director	Robert Atkins	Natural Person
8.	Director	Helen Gutierrez	Natural Person
9.	Director	Stephen Tabano	Natural Person
10.	Director	Allison Tutwiler	Natural Person
11.	Director	Wilbert Vaughn	Natural Person
12.	<Select an option>		<Select an option>
13.	<Select an option>		<Select an option>
14.	<Select an option>		<Select an option>
15.	<Select an option>		<Select an option>
16.	<Select an option>		<Select an option>
17.	<Select an option>		<Select an option>
18.	<Select an option>		<Select an option>
19.	<Select an option>		<Select an option>
20.	<Select an option>		<Select an option>

Second Principal Disclosure Level:

Volunteers of America of Florida

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for a Developer](#)

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being identified

Second Level Entity #	Select the type of Principal being associated with the corresponding First Level Principal Entity	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal Identified
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>
<Select a #>	<Select an option>		<Select an option>

Principal Disclosures for the Developer

Select the organizational structure for the Developer entity:

The Developer is a: <Select an option>

Provide the name of the Developer entity after selecting its organizational structure above.

<Insert name of corresponding Developer entity here>

First Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer.](#)

<u>First Level Entity #</u>	<u>Select Type of Principal of Developer</u>	<u>Enter Name of First Level Principal</u>	<u>Select organizational structure of First Level Principal identified</u>
1.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
2.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
3.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
4.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
5.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
6.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
7.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
8.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
9.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
10.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
11.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
12.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
13.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
14.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
15.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
16.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
17.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
18.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
19.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
20.	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>

Second Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for a Developer.](#)

<u>Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being</u>	<u>Second Level Entity #</u>	<u>Select the type of Principal being associated with the corresponding First Level Principal Entity</u>	<u>Enter Name of Second Level Principal</u>	<u>Select organizational structure of Second Level Principal identified</u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>
<u><Select a #></u>	<u>_____</u>	<u><Select an option></u>	<u>_____</u>	<u><Select an option></u>

Principal Disclosures for the Developer

Select the organizational structure for the Developer entity:

The Developer is a: <Select an option>

Provide the name of the Developer entity after selecting its organizational structure above.

<Insert name of corresponding Developer entity here>

First Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal Identified
1.	<Select an option>		<Select an option>
2.	<Select an option>		<Select an option>
3.	<Select an option>		<Select an option>
4.	<Select an option>		<Select an option>
5.	<Select an option>		<Select an option>
6.	<Select an option>		<Select an option>
7.	<Select an option>		<Select an option>
8.	<Select an option>		<Select an option>
9.	<Select an option>		<Select an option>
10.	<Select an option>		<Select an option>
11.	<Select an option>		<Select an option>
12.	<Select an option>		<Select an option>
13.	<Select an option>		<Select an option>
14.	<Select an option>		<Select an option>
15.	<Select an option>		<Select an option>
16.	<Select an option>		<Select an option>
17.	<Select an option>		<Select an option>
18.	<Select an option>		<Select an option>
19.	<Select an option>		<Select an option>
20.	<Select an option>		<Select an option>

Second Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for a Developer](#)

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being	Second Level Entity #	Select the type of Principal being associated with the corresponding First Level Principal Entity	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal Identified
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>
<Select a #>		<Select an option>		<Select an option>

