

**BEFORE THE  
FLORIDA HOUSING FINANCE CORPORATION**

**PARRAMORE OAKS, LLC,**

**Petitioner,**

**vs.**

**FLORIDA HOUSING FINANCE  
CORPORATION,**

**FHFC Case No. 2017-034BP  
FHFC RFA No. **2016-113**  
Petitioner's Application No. **2017-200C****

**Respondent.**

\_\_\_\_\_ /

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

Pursuant to Sections 120.569 and 120.57(1) and (3), Fla. Stat., and Florida Housing Finance Corporation Request for Application ("RFA") No. 2016-113, at Section Six, and Rules 28-106.205 and 67-60.009, Fla. Admin. Code; and Rule Chapter 28-110, Fla. Admin. Code, Petitioner PARRAMORE OAKS, LLC ("Petitioner" or "Parramore Oaks"), an applicant for funding in Florida Housing Finance Corporation RFA No. 2016-113 for Affordable Housing Developments in Broward, Duval, Hillsborough, Orange, Palm Beach, and Pinellas Counties, hereby reserves its right to protest the proposed eligibility, scoring, and ranking determinations of Respondent Florida Housing Finance Corporation in RFA 2016-113. Parramore Oaks' application was deemed eligible and was preliminarily selected for funding and Parramore Oaks does not contest those determinations. Parramore Oaks reserves the right to contest the scoring, ranking, and eligibility determinations made regarding Application No. 2017-239C, Bryce Landing. In support of this Protest and Petition, Petitioner state as follows:

RECEIVED  
17 MAY 22 PM 1:30  
FLORIDA HOUSING  
FINANCE CORPORATION

### Notice

4. On Friday, May 5, 2017, at approximately 9:58 a.m., Parramore Oaks and all other applicants in RFA 2016-113 received notice that FHFC's Board of Directors had approved the selection of certain applicants for awards of tax credits (subject to satisfactory completion of the credit underwriting process, which is required of all applicants selected for funding). Such notice was provided by the posting of two spreadsheets on the Florida Housing website, [www.floridahousing.org](http://www.floridahousing.org). One single page spreadsheet was entitled "RFA 2016-113 Recommendations," and identified those applications which had been selected for funding; a copy of that spreadsheet is attached to this petition as Exhibit "A." A second two-page spreadsheet was entitled "RFA 2016-113 All Applications," and divided all applications received by Florida Housing in this RFA as eligible or ineligible, listing them in order of application number within each group; a copy of this spreadsheet is attached here to as Exhibit "B."

5. Parramore Oaks timely filed a Notice of Protest, with attachments, on Wednesday, May 10, 2015, at approximately 8:38 a.m., copy attached hereto as Exhibit "C." Petitioner's Formal Written Protest and Petition for Formal Administrative Proceedings is being filed within 10 calendar days of that notice, as calculated pursuant to Section 120.57(3), Fla. Stat.

6. In addition to Parramore Oaks, nine other applicants in RFA 2016-113 filed notices of protest in response to the May 5 posting of funding awards and eligibility determinations. One of those other nine notices was filed by an applicant proposing a development in Orange County: HTG Bryce, LLC (for Bryce Landing), Application No. 2017-239C. HTG Bryce was assigned lottery #1 and was preliminarily determined to be eligible for consideration for funding, but was not selected because its application score was 28 points; Parramore Oaks' application score was

33 points. As explained more fully below, application score is the first factor applied in ranking applicants for funding selection.

**Substantial Interest Affected**

7. Parramore Oaks’ substantial interests are being determined in the instant proceeding because Parramore Oaks is an applicant for low income housing tax credit funding whose application was preliminarily awarded funding. Parramore Oaks cannot develop its proposed development to include 80 low income tenant set-aside units without the award of the requested housing credit funding. Administrative proceedings initiated by other applicants in response to the announced funding awards in this RFA could result in the loss of funding to Parramore Oaks.

**RFA 2016-113 Ranking and Selection Process**

8. Through the RFA 2016-113 process, FHFC seeks to award up to an estimated \$14,669,052 in annual housing credits to qualified applicants seeking to construct low income rental housing in the Six Large Counties. Under the terms of the RFA, the highest ranked eligible application from each of the Six Large Counties (Broward, Duval, Hillsborough, Orange, Palm Beach, and Pinellas) would be selected for funding; and if any funding remained, a second eligible application from Broward County would receive funding. If sufficient funding was not available to fully fund the second Broward County application, it would receive a “Binding Commitment” of future tax credit allocation in order to meet its full request amount. After funding these six or seven applicants, the RFA specified that “no additional Applications from any county will be selected for funding.”

9. Applicants request in their applications a specific dollar amount of housing credits to be given to the Applicant each year for a period of 10 years. Applicants typically sell the rights

to that future stream of income tax credits (through the sale of almost all of the ownership interest in the Applicant entity) to an investor to generate the majority of the capital necessary to construct the development. The amount of housing credits an applicant may request is based on several factors, including but not limited to a certain percentage of the projected Total Development Cost; a maximum funding amount per development based on the county in which the development will be located; and whether the development is located within certain designated areas of some counties.

10. Florida Housing received 43 Applications seeking funding in RFA 2016-113. Developments were proposed in all six of the Six Large Counties included in the RFA, including seventeen (17) in Orange County (where Parramore Oaks will be located). Because of the process employed by Florida Housing for this RFA, five of the Six Large Counties would be awarded one and only one funding award; Broward County would receive two awards.

11. The applications were received, processed, deemed eligible or ineligible, scored, and ranked, presumably pursuant to the terms of RFA 2016-113; FHFC Rule Chapters 67-48 and 67-60, Fla. Admin. Code; and applicable federal regulations. Applications are considered for funding only if they are deemed eligible, based on whether the Application complies with Florida Housing's various content requirements. Of the 43 Applications submitted to FHFC in RFA 2016-113, 37 were found "eligible," and 6 were found ineligible. Of the seventeen (17) applications submitted for Orange County, fifteen (15), including Parramore Oaks, were found eligible and two (2) were found ineligible; no ineligible applicants have timely challenged the finding of ineligibility. A two page spreadsheet created by Florida Housing, entitled "RFA 2016-113 – All Applications," identifying all eligible and ineligible applications (and other relevant information) is attached to this Petition as Exhibit "B".

12. The first consideration in sorting eligible applications for funding is Application scores. Applicants can achieve a maximum score of 33 points. Eighteen (18) of those 33 points are attributable to “proximity” scores based on the distance of the proposed development from services needed by tenants, and 5 points are attributable to General Development Experience of the Developer entity involved with the Application.

**Local Government Contribution and Local Government Area of Opportunity Points**

13. Applicants can also receive up to five (5) points or exactly ten (10) points for Local Government Contribution (“LGC”) points in one of several ways. First, Applicants who propose to rehabilitate or acquire and rehabilitate an existing development (instead of new construction) will automatically receive five (5) LGC points without the need for demonstrating any actual contribution by a Local Government.

14. Second, “New Construction” Applicants who provide evidence of a Local Government grant, loan, fee waiver, or fee deferral whose dollar value exceeds a certain amount will receive five (5) LGC points. For Broward County, the target LGC amount is \$100,000, and for the other five Large Counties, including Orange County, the target LGC amount is \$75,000. Applicants who receive some amount of LGC that is less than the target LGC amount for their county will receive a pro-rata number of LGC points.

15. Third, Applicants who demonstrate a specified higher level of LGC in the amount of cash loans or cash grants only (not fee waivers or fee deferrals) are deemed Local Government Area of Opportunity (“LGAO”) funding recipients, and receive 10 points. The cash loan or grant amount necessary to receive LGAO points varies by county, building type (Garden Apartment, Mid-Rise, and High Rise), construction material (wood or concrete), and development category

(New Construction or Rehabilitation). Applicants cannot receive partial, pro-rata LGAO points if the contribution does not equal or exceed the LGAO amount.

16. The same local government jurisdiction cannot award LGAO funding amounts to more than one applicant, or neither recipient would receive LGAO funding points. However, a county government can award LGAO funding amount to one applicant, and a municipality within that same county could award an LGAO funding amount to a different applicant, and both such applicants would receive ten (10) LGC points.

17. Among Orange County applicants, Parramore Oaks was the only applicant to receive an LGAO funding amount; its LGC score was thus ten (10) points and its total Application score was 33. The other fourteen (14) eligible Orange County applicants each received five (5) LGC points and a total Application score of 28.

#### **Scoring Tie-Breakers**

18. Many applicants achieve tie scores, and in anticipation of that occurrence FHFC designed the RFA and rules to incorporate a series of “tie breakers,” the last of which is randomly assigned lottery numbers. Lottery numbers often play a significant role in the outcome of FHFC’s funding cycles. For Orange County, however, none of the tie-breakers played a role in the selection process, since only one applicant (Parramore Oaks) received the maximum score of 33 points.

19. Florida Housing appointed a Review Committee from its staff to evaluate and score the applications in this RFA. The Review Committee recommended certain eligibility determinations; scoring preference satisfaction determinations; and funding selections to Florida Housing’s Board of Directors. The Recommendations are as contained on Exhibits “A” and “B” attached. For Orange County, the staff recommended, and the Board of Directors approved,

finding Parramore Oaks eligible and having the highest score among Orange County applicants, and thus selecting Parramore Oaks for funding.

**Disputed Issues of Material Fact**

20. Petitioner does not at this time believe there are any disputed issues regarding Florida Housing's determinations as to applicants for Orange County, including Parramore Oaks and Bryce Landing. However, as noted previously in this Petition, Bryce Landing has filed a Notice of Protest in this matter. If Bryce Landing files a formal written protest which seeks to displace Parramore Oaks from funding or to otherwise affect Parramore Oaks' substantial interests, Parramore Oaks reserves the right to amend this Petition to raise eligibility, scoring, and ranking issues concerning Bryce Landing.

**Concise Statement of Ultimate Facts, Relief Sought, and Entitlement to Relief**

21. As its concise statement of ultimate fact, Petitioner asserts that its own Application was properly determined to satisfy all eligibility criteria and preferences and to have the single highest score among Orange County applicants, and is entitled to be selected for funding.

22. To the extent Florida Housing disputes any material factual allegations in this Petition, Parramore Oaks demands that this Petition be forwarded to the Division of Administrative Hearings for Assignment of an Administrative Law Judge to conduct formal evidentiary proceedings, after affording the parties adequate time for case preparation and discovery.

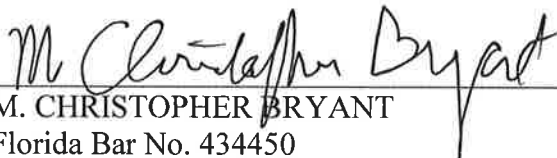
23. Petitioner Parramore Oaks seeks entry of recommended and final orders finding it to be the highest scoring eligible applicant from Orange County with a score of 33 points, and entitled to be selected for funding. Parramore Oaks is entitled to this relief by the terms and conditions of the FHFC's RFA; by FHFC Rule Chapters 67-48 and 67-60, Fla. Admin. Code; and

by Chapters 120 and 420, Florida Statutes, including but not limited to Sections 120.569, 120.57(1) and (3), Florida Statutes.

**Request for Settlement Meeting**

24. Pursuant to Section 120.57(3)(d), Fla. Stat., Parramore Oaks requests an opportunity to meet with Florida Housing to resolve this matter by mutual agreement within seven business days after filing. Parramore Oaks reserves the right to agree to extend the time for such a settlement meeting.

**FILED AND SERVED** this 22<sup>nd</sup> day of May, 2017.

  
M. CHRISTOPHER BRYANT  
Florida Bar No. 434450  
OERTEL, FERNANDEZ, BRYANT  
& ATKINSON, P.A.  
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ATTORNEY FOR PARRAMORE OAKS, LLC



**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that the original of the foregoing Formal Written Protest and Petition for Formal Administrative Proceedings has been filed by e-mail and hand delivery with the Corporation Clerk ([CorporationClerk@floridahousing.org](mailto:CorporationClerk@floridahousing.org)), Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329, and a copy via Hand Delivery to the following this 22<sup>nd</sup> day of May, 2017:

Hugh R. Brown, General Counsel  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, Florida 32301-1329  
[Hugh.Brown@floridahousing.org](mailto:Hugh.Brown@floridahousing.org)

  
\_\_\_\_\_  
ATTORNEY

**RFA 2016-113 Recommendations**

Total HC Available for RFA	14,669,052.00
Total HC Allocated	14,312,000.00
Total HC Remaining	357,052.00

Application Number	Name of Development	County	Name of Contact Person	Name of Developers	HC Funding Amount	Total Points	Development Category Funding Preference	Per Unit Construction Funding Preference	Leveraging Classification	75 Units or more Total Unit Preference	Florida Job Creation Preference	Lottery Number
<b>Broward County Application</b>												
2017-211C	Pinnacle at Peacefield	Broward	David O. Deutch	Pinnacle Housing Group, LLC*	2,561,000.00	33	Y	Y	A	Y	Y	2
<b>Duval County Application</b>												
2017-235C	Lofts at LaVilla on Monroe	Duval	James R. Hoover	TVC Development, Inc.	1,660,000.00	33	Y	Y	A	Y	Y	21
<b>Hillsborough County Application</b>												
2017-230C	The Boulevard at West River	Hillsborough	Eileen M Pope	WRDG Boulevard, LLC	2,110,000.00	33	Y	Y	A	Y	Y	10
<b>Orange County Application</b>												
2017-200C	Parramore Oaks	Orange	Paula M Rhodes	Invictus Development, LLC	2,110,000.00	33	Y	Y	B	Y	Y	11
<b>Palm Beach County Application</b>												
2017-229C	Georgian Gardens Apartments	Palm Beach	Alberto Milo, Jr.	Georgian Gardens Apartments	1,650,000.00	33	Y	Y	A	Y	Y	9
<b>Pinellas County Application</b>												
2017-201C	Heritage Oaks	Pinellas	Brian D Evjen	Norstar Development USA, LP, PCHA	1,660,000.00	33	Y	Y	A	Y	Y	15
<b>2nd Broward County Application</b>												
2017-241C	Saratoga Crossings	Broward	Elizabeth Wong	APC Saratoga Crossings I	2,561,000.00	33	Y	Y	A	Y	Y	38

\*Currently suspended pursuant to Fla. Admin. Code R. 67-48.002

On May 5, 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.

RFA 2016-113 All Applications

Application Number	Name of Development	County	Name of Contact Person	Name of Developers	Demo. Commitment	Total Set-Aside Units	HC Funding Amount	Eligible for Funding?	Total Points	Development Category Preference	Total Corp Funding Per Set-Aside	Leveraging Classification	75 Units or more Total Unit Preference	Florida Job Creation Preference	Lettery Number
<b>Eligible Applications</b>															
2017-200C	Parramore Oaks	Orange	Paula M Rhodes	InVictus Development, LLC; ADC Communities, LLC; Royal American Development, LLC	F	96	2,110,000.00	Y	33	Y	153,558.29	B	Y	Y	11
2017-201C	Heritage Oaks	Pinellas	Brian D Elyen	Norstar Development USA, LP; PCHA Development, LLC	E	85	1,660,000.00	Y	33	Y	136,442.99	A	Y	Y	15
2017-202C	Tuscany at Aloma	Orange	Joseph Chambers	Gardner Capital Development Florida, LLC; Wintzer Park Urban Development, LLC; JAX Urban Initiatives Development, LLC	F	96	1,800,000.00	Y	28	Y	130,997.60	A	Y	Y	43
2017-203C	Anders Park	Duval	Joseph Chambers	Jacksonville Redevelopment Partners, LLC; JAX Urban Initiatives Development, LLC	F	84	1,125,000.00	Y	28	N	109,173.08	A	Y	Y	5
2017-204C	Pinnacle at the Wesleyan	Broward	David O. Deutch	Pinnacle Housing Group, LLC**	F	90	1,892,000.00	Y	28	Y	124,841.68	A	Y	Y	27
2017-205C	Tuscany at Aloma II	Orange	Joseph Chambers	Gardner Capital Development Florida, LLC; Wintzer Park Urban Development, LLC	E	89	1,700,000.00	Y	28	Y	133,450.73	A	Y	Y	42
2017-207C	Springfield Plaza	Hillsborough	Clifton E. Phillips	Roundstone Development, LLC	E	96	1,528,577.00	Y	28	Y	128,506.24	A	Y	Y	8
2017-209C	Banyan Court	Palm Beach	Alexander B Kiss	Banyan Development Group, LLC; Judd Roth Real Estate Development, Inc.	F	85	1,540,000.00	Y	28	Y	126,579.64	A	Y	Y	19
2017-210C	Ashleigh Park	Pinellas	Timothy M. Morgan	JJC Florida Development, LLC	E	80	1,660,000.00	Y	28	Y	144,970.67	B	Y	Y	7
2017-211C	Pinnacle at Peacefield	Broward	David O. Deutch	Pinnacle Housing Group, LLC**	E	120	2,561,000.00	Y	33	Y	126,738.72	A	Y	Y	2
2017-212C	Preserve at Sabal Park	Hillsborough	Shawn Wilson	Blue Sky Communities III, LLC	F	144	2,110,000.00	Y	33	Y	102,372.20	A	Y	Y	18
2017-213C	Madison Hollow-South	Orange	Patrick E. Law	American Residential Development, LLC	E	80	2,110,000.00	Y	28	Y	138,468.75	B	Y	Y	28
2017-214C	Berkeley Landing	Palm Beach	Jonathan L. Wolf	Berkeley Landing Developer, LLC	E	116	2,110,000.00	Y	28	Y	127,082.73	A	Y	Y	23
2017-215C	Southwick Commons	Orange	Jonathan L. Wolf	Southwick Commons Property Developer, LLC	E	116	2,110,000.00	Y	28	Y	127,082.73	A	Y	Y	12
2017-216C	Stafford Point	Orange	Jonathan L. Wolf	Stafford Point Developer, LLC	E	110	2,110,000.00	Y	28	Y	134,014.51	A	Y	Y	6
2017-217C	Chamelside Senior Apartments	Hillsborough	Donald W. Paxton	WOB Beneficial Development 16 LLC	E	80	2,090,000.00	Y	23	Y	137,156.25	A	Y	Y	34
2017-219C	Heritage at City View	Palm Beach	Robert G. Hoskins	NuRock Development Partners, Inc.	E	100	2,018,500.00	Y	33	Y	127,980.66	A	Y	Y	22
2017-220C	Westbury Village II at Riviera Beach	Palm Beach	Mara S. Madres	Cornerstone Group Partners, LLC	E	80	1,445,000.00	Y	28	Y	126,194.35	A	Y	Y	20
2017-222C	Westbury Village I at Riviera Beach	Palm Beach	Mara S. Madres	Cornerstone Group Partners, LLC	F	108	1,945,000.00	Y	28	Y	125,822.38	A	Y	Y	25
2017-223C	Village View	Broward	Matthew Reiger	HTG View Developer, LLC	E	96	2,561,000.00	Y	28	Y	119,046.48	A	Y	Y	33
2017-224C	The Hudson	Pinellas	Matthew Reiger	HTG Hudson Developer, LLC	E	87	1,660,000.00	Y	28	Y	133,306.37	A	Y	Y	17
2017-225C	Barnett Villas	Orange	Alexander B Kiss	Banyan Development Group, LLC; Judd Roth Real Estate Development, Inc.	E	130	2,110,000.00	Y	28	Y	131,094.67	A	Y	Y	41
2017-226C	Leah Gardens	Duval	James R. Hoover	TVC Development, Inc.	E	100	1,570,718.00	Y	28	Y	126,865.68	A	Y	Y	24
2017-228C	Waterview Pointe Apartments	Orange	Matthew Reiger	HTG Waterview Pointe Developer, LLC	F	120	2,110,000.00	Y	28	Y	122,846.63	A	Y	Y	36
2017-229C	Georgian Gardens Apartments	Palm Beach	Alberto Millo, Jr.	Georgian Gardens Apartments Developer, LLC	E	87	1,650,000.00	Y	33	Y	132,509.32	A	Y	Y	9
2017-230C	The Boulevard at West River	Hillsborough	Eileen M Pope	WRDG Boulevard, LLC	F	200	2,110,000.00	Y	33	Y	73,707.98	A	Y	Y	10

RFA 2016-113 All Applications

Application Number	Name of Development	County	Name of Contact Person	Name of Developers	Demo. Commitment	Total Set Aside Units	HC Funding Amount	Eligible For Funding?	Total Points	Development Category Preference	Development Funding Preference	Per Unit Construction Funding Preference	Development Category	Total Corp Funding Per-Set-Aside	Leveraging Classification	75 Units or more Total Unit Preference	Florida Job Creation Preference	Lottery Number	
2017-231C	Berkshire Square	Orange	Jonathan L. Wolf	Berkshire Square Developer, LLC	E	116	2,110,000.00	Y	28	Y	Y	Y	NC	127,082.73	A	Y	Y	30	
2017-232C	Madison Point	Pinellas	Patrick E. Law	American Residential Development, LLC	E	80	1,660,000.00	Y	28	Y	Y	Y	NC	108,937.50	A	Y	Y	31	
2017-233C	Madison Plaza	Orange	Patrick E. Law	American Residential Development, LLC	E	80	2,110,000.00	Y	28	Y	Y	Y	NC	138,468.75	B	Y	Y	40	
2017-234C*	Birch Hollow	Orange	Matthew Rieger	HTG Birch Developer, LLC	E	120	1,625,000.00	Y	28	Y	Y	Y	NC	142,187.50	B	Y	Y	37	
2017-235C	Lefts at Lavilla on Monroe	Duval	James R. Hoover	TVC Development, Inc.	F	108	1,660,000.00	Y	33	Y	Y	Y	NC	97,454.06	A	Y	Y	21	
2017-236C	Compass Pointe	Orange	Brianne E. Heffner	Southport Development, Inc. a WA corporation doing business in Fla	E	80	1,400,000.00	Y	28	Y	Y	Y	NC	122,264.42	A	Y	Y	3	
2017-238C	Madison Landing	Orange	Patrick E. Law	American Residential Development, LLC	E	80	2,110,000.00	Y	28	Y	Y	Y	NC	138,468.75	B	Y	Y	32	
2017-239C	Byrce Landing	Orange	Matthew Rieger	HTG Bryce Developer, LLC	E	136	2,110,000.00	Y	28	Y	Y	Y	NC	125,311.09	A	Y	Y	1	
2017-240C	Anderson Terrace Apartments	Orange	Matthew Rieger	HTG Anderson Terrace Developer, LLC	F	120	1,625,000.00	Y	28	Y	Y	Y	NC	142,187.50	B	Y	Y	29	
2017-241C	Saratoga Crossings	Broward	Elizabeth Wong	APC Saratoga Crossings I Development, LLC; Dania Beach Quality Housing	F	128	2,561,000.00	Y	33	Y	Y	Y	NC	118,817.55	A	Y	Y	38	
2017-242C	Heron Estates Family	Palm Beach	Matthew Rieger	HTG Heron Estates Family Developer, LLC	F	79	1,449,527.00	Y	33	Y	Y	Y	NC	128,192.10	A	Y	Y	39	
<b>Ineligible Applications</b>																			
2017-206C	The Promenade at West Lake	Broward	Clifton E. Phillips	Roundstone Development, LLC	E	75	1,789,658.00	N	20	Y	Y	Y	NC	128,600.69		Y	Y	13	
2017-208C	Venetian Isles	Pinellas	Kimberly K. Murphy	Royal American Development, Inc.; Green Mills Holdings, LLC	E	96	1,660,000.00	N	28	Y	Y	Y	NC	109,935.82		Y	Y	26	
2017-218C	Madison Highlands	Hillsborough	Patrick E. Law	American Residential Development, LLC	E	90	2,110,000.00	N	23	Y	Y	Y	NC	148,446.79		Y	Y	14	
2017-221C	Wingate Apartments	Palm Beach	Mira S Maides	Cornerstone Group Partners, LLC	F	82	1,485,000.00	N	28	Y	Y	Y	NC	126,524.51		Y	Y	35	
2017-227C	CHANDLERS CROSSING APARTMENTS	Orange	DEION R. LOWERY	DRIL CC DEVELOPMENT LLC	F	88	1,576,344.00	N	10	Y	Y	Y	NC	125,149.86		Y	Y	16	
2017-237C	ETHANS WALK APARTMENTS	Orange	DEION R. LOWERY	DRIL EW DEVELOPMENT LLC	E	88	1,576,344.00	N	10	Y	Y	Y	NC	125,149.86		Y	Y	4	

\*HC Request Amount was adjusted during scoring. This also affected the Corporation Funding Per Set-Aside Amount  
 \*\* Currently suspended pursuant to Fla. Admin. Code R. 67-48.002

On May 5, 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.



OERTEL,  
FERNANDEZ,  
BRYANT &  
ATKINSON, P.A.

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TIMOTHY J. PERRY  
  
OF COUNSEL:  
C. ANTHONY CLEVELAND

May 10, 2017

*Via Hand Delivery and e-mail: [CorporationClerk@floridahousing.org](mailto:CorporationClerk@floridahousing.org)*

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

Re: RFA 2016-113 Housing Credit Financing in Six Large Counties  
Notice of Protest by Parramore Oaks, LLC  
Applicant for Application No. 2017-200C

Dear Corporation Clerk:

Pursuant to Section 120.57(3) Fla. Stat., and Rules 67-60.009(2) and 28-110.003, Fla. Admin. Code, Parramore Oaks, LLC, Applicant for Application No. 2017-200C in RFA 2016-113, hereby gives notice of its intent to protest the determinations contained on the attached spreadsheets reflecting proposed awards of funding (Attachment A) and proposed scoring, eligibility, and ineligibility determinations (Attachment B) in RFA 2016-113, as approved by the Corporation's Board of Directors on Friday, May 5, 2017. These spreadsheets were posted on the Corporation's website on Friday, May 5, 2017, at 9:58 a.m.; this Notice of Protest is being filed within 72 hours of such posting (excluding Saturdays and Sundays).

The Parramore Oaks, LLC application was deemed eligible and has been selected for funding, and Parramore Oaks, LLC does not contest those determinations.

Parramore Oaks, LLC will file its formal written protest within the time required by Section 120.57(3), Fla. Stat.

Sincerely,

M. Christopher Bryant  
Counsel for Parramore Oaks, LLC  
Applicant for Application No. 2017-200C

Exhibit C