

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

HTG BRYCE, LLC

Petitioner,

vs.

FLORIDA HOUSING FINANCE CORPORATION

Respondent.

**FHFC Case No. 2017-033BP
RFA 2016-113
App. No. 2017-239C**

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

Petitioner, HTG BRYCE, LLC (“HTG Bryce”), pursuant to sections 120.57 (1) and (3), Florida Statutes, and Rules 28-110, 67-48 and 67-60, Florida Administrative Code (“FAC”) hereby files this Formal Written Protest and Petition (the “Petition”) regarding the scoring decisions of the Respondent, FLORIDA HOUSING FINANCE CORPORATION (“Florida Housing”) to award funding to responsive Applicants pursuant to RFA 2016-113 *Housing Credit Financing for Affordable Housing Developments located in Broward, Duval, Hillsborough, Orange, Palm Beach and Pinellas Counties* (hereinafter the “RFA”).

INTRODUCTION

1. This Petition is filed pursuant to Sections 120.57 (1) and (3), Florida Statutes, Rules 28-110 and 67-60, Florida Administrative Code.

PARTIES

2. Petitioner, HTG Bryce, is a Florida limited liability company authorized to transact business within the State of Florida, with an address at 3225 Aviation Avenue, Suite 602,

Coconut Grove, Florida 33133. HTG Bryce's address, phone number and email address for purposes of this proceeding are that of undersigned counsel.

3. The affected agency is Florida Housing Finance Corporation ("Florida Housing"). Florida Housing's mailing address is 227 North Bronough Street, Suite 5000, Tallahassee, Florida.

NOTICE

4. On October 28, 2016, Florida Housing issued the RFA.

5. On November 10, 2016, the RFA was modified by Florida Housing and a Notice of Modification of RFA 2016-113 was issued.

6. Applications in response were due on or before December 30, 2016.

7. Florida Housing received 43 applications in response to the RFA. Petitioner timely submitted an application in response to the RFA requesting an allocation of \$2,110,000.00 in Housing Credits for its proposed one hundred and thirty-six (136) unit affordable housing development in Orange County, Florida.

8. Petitioner's received notice of the preliminary scoring and ranking on Friday, May 5th at 9:58 am. A copy of the notices posted on the Corporations website are attached hereto as Composite Exhibit "A". Petitioner was deemed eligible for funding.

9. On Wednesday, May 10, 2017 at 8:18am Petitioner timely submitted their Notice of Intent to protest Florida Housing's intended decision. A copy of the Notice of Intent is attached hereto as Exhibit "B".

BACKGROUND

10. Florida Housing is designated as the housing credit agency for the State of Florida within the meaning of Section 42(h)(7)(A) of the Internal Revenue Code (“IRC”) and has the responsibility and authority to establish procedures for allocating and distributing Housing Credits. § 420.5099, Florida Statutes (2016).

11. Florida Housing has adopted Chapter 67-60, Florida Administrative Code which details the procedure for administering the competitive solicitation housing credit program authorized by Section 42 of the IRC and Section 420.5099, Florida Statutes.

12. Through the RFA, process Florida Housing anticipated awarding up to an estimated \$14,669,052.00 of Housing Credits to Developments proposed in Broward County, Duval County, Hillsborough County, Orange County, Palm Beach County and Pinellas County.

13. Of the forty-three (43) applications received in response to the RFA, thirty- seven (37) were deemed eligible, with six (6) applications deemed ineligible for funding. The applications filed by, Pinnacle at Peacefield, Ltd (App. 2017-211C); Lofts at LaVilla on Monroe, Ltd (App. 2017-235C); West River Phase 2, LP (App. 2017-230C); Parramore Oaks, LLC (App. 2017-200C); Georgian Garden Apartments, LLC (App. 2017-229); Heritage Oaks, LLLP (App. 2017-201C) and Saratoga Crossings, Ltd. (App. 2017-241C) were deemed eligible and selected for funding.

14. The RFA provides that review committee members independently evaluate and score their assigned portions of the submitted applications based on various mandatory and scored items. The maximum point total that an applicant can receive is 33 points. Failure to meet a mandatory item results in an application being deemed ineligible. RFA at p. 53.

15. Applicants must demonstrate local government support for the proposed Development in one of two ways, either through a Local Government Contribution, which can result in a

maximum of five (5) points or as a Local Government Area of Opportunity, which can result in a maximum of ten (10) points.¹ RFA at p. 37-41. The funding amounts dedicated by a jurisdiction to qualify as a Local Government Area of Opportunity greatly exceed the amounts needed to qualify for a Local Government Contribution. By way of example, for a proposed Development located in Orange County, Florida, the contribution must be at least \$75,000.00 to achieve the maximum of five (5) points for a Local Government Contribution. To qualify for the Local Government Area of Opportunity points in Orange County, Florida the minimum contribution is anywhere from \$385,250 to \$739,500.00 depending upon the Building Type. RFA at p. 41.

16. Only applications that are eligible will be considered for funding selection. Eligibility requirements include the following,

- Submission requirements,
- \$25,000 Letter of Credit,
- Financial Arrearage Requirements,
- RECAP Conditions met,
- Minimum Total Proximity Score,
- Minimum Transit Score,
- Mandatory Distance Requirements,
- Total Development Cost Per Unit Limitation
- *All Mandatory Items.*

The listing of Mandatory items includes the Surveyor Certification Form and Evidence of Site Control. RFA at p. 51-54. (Emphasis Supplied)

¹ If multiple Applications demonstrate Local Government contributions from the same jurisdiction in an amount sufficient to qualify for Local Government Area of Opportunity points, then all will be ineligible for these points, but may receive the Local Government Contribution points. RFA at p. 41.

17. The highest scoring Applications will be determined by first sorting all eligible Applications from highest score to lowest score, with any scores that are tied separated as follows:

- a. First, by the Application's eligibility for the Development Category Funding Preference ... (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- b. Next, by the Application's eligibility for the Per Unit Construction Funding Preference... (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- c. Next by the Application's Leveraging Classification, applying the multipliers outlined in Item 8... (with Applications having the Classification of A listed above Application's having the Classification of B);
- d. Next, by the Application's eligibility for the 75 or More Total Unit Funding Preference, based on the total number of units stated at question 5. E. (1)... (with Applications that reflect 75 or more total units listed above Applications that reflect less than 75 total units);
- e. Next, by the Application's eligibility for the Florida Job Creation Funding Preference which is outlined in Item 9... (with Applications that qualify for the preference listed above Applications that do not qualify for the preference; and
- f. Finally, by lottery number, resulting in the lowest lottery number receiving preference.

RFA at p. 52.

18. The Selection Process is as follows,

- a. The highest ranking eligible Application will be selected for funding for proposed Developments located in each of the following counties for which an eligible Application was received: Broward, Duval, Hillsborough, Orange, Palm Beach, and Pinellas.

RFA at p. 52.

19. Of the eligible applicants proposing developments within Orange County, Petitioner received 28 points, and had the highest lottery number 1, the application of Parramore Oaks, LLC received 33 points² and had lottery number 11.

² Parramore Oaks, LLC, qualified for the Local Government Area of Opportunity Funding and received ten (10) points, Petitioner received five (5) points for Local Government Contribution.

**RFA REQUIREMENTS FOR
SCATTERED SITES AND SURVEYOR CERTIFICATION FORM**

20. The RFA provides as follows as to the Surveyor Certification Form,

- (1) In order for an Application to meet the Mandatory requirement to provide a Development Location Point and applicable Scattered Sites Information, and be eligible for proximity points, the Application must provide an executed Surveyor Certification form.

- (2) Applications for proposed Developments that select and qualify for the Local Government Areas of Opportunity Funding points as outlined ... (b) automatically achieve the required Minimum Transit Service Score and the Minimum Total Proximity Score and receive the maximum Total Proximity Score of 18 points without the requirement to provide the services information... provided the Applicant includes,... an acceptable Surveyor certification form. *For purposes of this requirement, acceptable means that the form reflects the Development Name, Development Location, Development Location Point information at Part 1 of the form, applicable Scattered Sites Information at Part IV of the form....*

RFA at p. 20 (Emphasis Supplied)

21. The “Development Location Point” means a single point selected by the Applicant on the proposed Development site that is located within 100 feet of a residential building existing or to be constructed as part of the proposed Development. *For a Development which consists of Scattered Sites this means a single point on the site with the most units that is located within 100 feet of a residential building existing or to be constructed as part of the proposed development.* RFA at p. 91 (Emphasis Supplied).

22. The term “Scattered Sites” is defined as follows,

“... as applied to a single development, means a Development site that, when taken as a whole, is comprised of real property that is not contiguous (each such non-contiguous site within a Scattered Site development, is considered to be a “Scattered Site”). For purposes of this definition “contiguous” means touching at a point or along a boundary. Real property is contiguous if the only intervening real property interest is an easement provided the easement is not a roadway or street.... The location of the Scattered Sites means, at a minimum, the address number, street name, and city, and/or provide (i) the street name, closest

designated intersection and city (if located within a city), or (ii) the street name, closest designated intersection and county (if located in the unincorporated area of the county).

If the proposed development meets the definition of a Scattered Site the latitude and longitude coordinates for each Scattered Site must be provided. RFA at p. 90.³

PARRAMORE OAKS APPLICATION

23. The application of Parramore Oaks, LLC (hereinafter "Parramore Oaks") proposed a Scattered Site Development in the Parramore neighborhood of Orange County, Florida. The proposed development will be comprised of 120 units, with 49 units at a 3-story apartment building at the intersection of Carter and Parramore, a four-story building at the intersection of Parramore and Conley Street with 52 units and 19 townhomes at the southwest and southeast corner of Parramore Avenue and Conley Street.

24. Parramore Oaks identified the following intersections for the *Address of Development Site*, as required by the RFA,

- Conley Street, NW of the intersection of Conley Street and S. Parramore Avenue, Orlando;
- Conley Street SW of the intersection of Conley Street and S. Parramore Avenue, Orlando;
- Conley Street, SE of the intersection of Conley Street and S. Parramore Avenue, Orlando

Parramore Oaks application at p. 4.

25. The Surveyor Certification Form submitted by Parramore Oaks, identified the Development Location at Conley Street, NW of the intersection of Conley Street and S. Parramore Avenue, Orlando as the Scattered Site where the Development Location Point is located.

³ If the Development is a Scattered Site the address of each Scattered Site must also be provided within the application at 5.b (3).

26. As detailed in the *Staff Report to the Municipal Planning Board, dated October 18, 2016*, the proposed Development site was formerly designated as the Wells Landing Planned Development ⁴ (hereinafter “Wells Landing”). As part of the development process for Wells Landing in 2009, the development site, which had been formerly known as Parramore Village, was replatted as Wells Landing, and the Plat recorded in Plat Book 73, Page (s) 121 and 122 in 2009 in the Official Records of Orange County, Florida. The Plat includes the following Dedication by the Developer of Wells Landing, Nu Beginnings Parramore Village development to the Public:

DEDICATION

KNOW ALL MEN BY THESE PRESENTS, that the Company named below, being the owner in fee simple of the lands described in the foregoing caption to this plat, hereby dedicate such lands and plat for the uses and purposes therein described and dedicates the drainage flow through and utility easements and **all roadways labeled as “Public Roadways” shown herein to the perpetual use of the public.**

The Plat also contains a Certificate of Approval indicating the Plat was approved on June 22, 2009 by the City Council. A copy of the Wells Landing Plat recorded in Plat Book 73, Page (s) 121 and 122 of the Official Records of Orange County, Florida is attached hereto as Exhibit C.

27. The drawing accompanying the Plat indicates that McFall Avenue and America Street are “Public Roadways”.

28. The Purchase and Sale Agreement accompanying the Parramore Oaks application includes as Exhibit A, page 2 of 6, a sketch of Parcel 1 of the Development which is separated by

⁴ The Development Site was replatted as the Wells Landing Planned Development in 2009 however was never developed and a portion of the Development Site was transferred back to the Community Redevelopment Agency of Orlando in 2015.

the intersection of America Street and Parramore Avenue. A copy of Exhibit A, page 2 of 6 is attached hereto as Exhibit D.

29. Parramore Oaks, as permitted, included the following statement, as an Addendum to its Application :

In the Purchase and Sale Agreement submitted as Attachment 14 to this Exhibit A, the Exhibit A (legal description of the Property) includes a sketch of the Parcel 1 site superimposed over the plat of a prior proposed development (Wells Landing). None of the proposed Wells Landing development was constructed, including any of the proposed rights of way, and the entire site remains unimproved vacant land. Furthermore, the City of Orlando has advised that the dedication of the proposed public rights of way shown on the plat was never accepted by the City due to the failure to construct the improvements and the City of Orlando does not recognize or consider any part of the parcel 1 site to consist of roadway or street easements.

Parramore Oaks Application at p. 15.

30. The public roadway subdividing what Parramore Oaks has identified as Parcel 1 of its proposed development results in the Development Location Point not being located on the site with the most proposed units as is required by the RFA. The Development Location Point is located on a parcel with 49 units but according to the Wells Landing Plat should be on the parcel with 52 units.

31. Additionally, Parramore Oaks has failed to identify all of the Scattered Sites which comprise the Development Site as required by the RFA.

32. The Application of Parramore Oaks should have been deemed ineligible for not locating the Development Location Point on the scattered site with the most proposed units and for not identifying all the Scattered Sites.

Substantial Interests Affected

33. If Parramore Oaks had been deemed ineligible for funding, Petitioner would have been selected for funding to satisfy the County selection for Orange County. Having the next highest point total 28 and the lowest lottery number, HTG Bryce would have been selected for funding.

34. HTG Bryce is substantially affected by the wrongful determination that Parramore Oaks was eligible which impacted HTG Bryce's ability to be considered for funding through the RFA.

35. HTG Bryce is entitled to a Formal Administrative Hearing pursuant to Sections 120.57 (1) and 120.57 (3), Florida Statutes, to resolve the issues set forth in this Petition.

Disputed Issues of Material Fact and Law

36. Disputed issues of material fact and law exist and entitle Petitioner to a Formal Administrative Hearing pursuant to Section 120.57(1), Florida Statutes. The disputed issues of material fact and law include, but are not limited to, the following:

- a. Whether Florida Housing's determination that Parramore Oaks was eligible for funding was arbitrary and capricious.
- b. Whether Florida Housing's determination that Parramore Oaks was eligible for funding was contrary to competition;
- c. Whether Florida Housing's determination that Parramore Oaks was eligible for funding was clearly erroneous;
- d. Whether Parramore Oaks Development Location Point is on the site on which the most proposed units will be built.
- e. Whether Parramore Oaks properly identified all of the Scattered Sites.

Request to Resolve by Mutual Agreement

37. Petitioner requests the opportunity to meet with Florida Housing within seven (7) working days after filing this protest.

Reservation of Right to Amend

38. Petitioner reserves the right to amend the petition as discovery proceeds.

Statutes/Rules that Entitle Petitioner to Relief

39. Petitioner is entitled to relief pursuant to Sections 120.569 and 120.57, Florida Statutes, Chapters 28-106, 28-110, 67-48 and 67-60, Florida Administrative Code.

Concise Statement of Ultimate Fact and Law, Including the Specific Facts Warranting Reversal of the Agency's Intended Award

40. Petitioner participated in the RFA process to compete for Housing Credits based upon delineated scoring and ranking criteria. Parramore Oaks should have been deemed ineligible for an award due to its failure to locate the Development Location Point on the Scattered Site with the majority of the proposed units and its failure to identify all of the Scattered Sites which comprise the Development Site.

41. Unless the score and ranking is corrected and the preliminary allocation revised, Petitioner will be excluded from the funding and Parramore Oaks will be awarded funds contrary to the RFA and Florida Housing's governing statutes and rules.

42. A correct application of the eligibility, scoring and ranking criteria will result in funding for the Petitioner.

Demand for Relief

WHEREFORE, HTG Bryce, LLC requests that a hearing be scheduled and ultimately a Recommended and Final Order be entered determining Florida Housing's Review and scoring of Parramore Oaks Application was contrary to the RFA and to Florida Housing's governing statutes, rules and policies to such extent as to be arbitrary, capricious, contrary to competition and clearly erroneous and furthermore that Parramore Oaks is ineligible for funding.

Respectfully Submitted

/s/Maureen McCarthy Daughton

Maureen McCarthy Daughton

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Counsel for HTG Bryce, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and a copy of the foregoing has been filed by E-Mail to Kate Flemming, Corporation Clerk, Florida Housing Finance Corporation, 227 N. Bronough Street, Ste 5000, Tallahassee, Florida 32301, this 22nd day of May, 2017.

/s/Maureen McCarthy Daughton
Maureen McCarthy Daughton

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	Per Unit Construction Funding Preference	Development Category	Total Comp Funding Per Set-Aside	Leveraging Classification	75 Units or more Total Unit Preference	Florida Job Creation Preference	Lottery Number
2017-200C	Paranovic Oaks	Orange	Paula M Rhoads	Inflecta Development, LLC, ADC Communities, LLC, Royal American	F	96	2,110,000.00	Y	33	Y	Y	NC	159,558.29	B	Y	Y	11
2017-201C	Heritage Oaks	Pinellas	Brian D Eylan	Norstar Development USA, LP/PCA Development, LLC	E	85	1,660,000.00	Y	33	Y	Y	NC	186,442.99	A	Y	Y	15
2017-202C	Turkey at Aloma	Orange	Joseph Chambers	Gardner Capital Development Florida, LLC, Winter Park Urban Development, LLC, Winter Park Urban Development, LLC, JAX Urban Initiatives Development, LLC	F	96	1,800,000.00	Y	28	Y	Y	NC	130,997.60	A	Y	Y	49
2017-203C	Anders Park	Duval	Joseph Chambers	JAX Urban Initiatives Development, LLC	F	84	1,125,000.00	Y	28	N	Y	R	108,173.08	A	Y	Y	5
2017-204C	Pinacade at the Wesleyan	Broward	David O. Deutch	Pinacade Housing Group, LLC**	F	90	1,892,000.00	Y	28	Y	Y	NC	124,841.68	A	Y	Y	27
2017-205C	Tuscany at Aloma II	Orange	Joseph Chambers	Gardner Capital Development Florida, LLC, Winter Park Urban Development, LLC, Roundstone Development, LLC	E	89	1,700,000.00	Y	28	Y	Y	NC	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	Y	NC	128,605.24	A	Y	Y	8
2017-209C	Bayview Court	Palm Beach	Alexander B Kats	Bayview Development Group, LLC, Judd Roth Real Estate Development, Inc.	F	85	1,540,000.00	Y	28	Y	Y	NC	126,579.64	A	Y	Y	19
2017-210C	Ashleigh Park	Pinellas	Timothy M. Morgan	JXC Florida Development, LLC	E	80	1,660,000.00	Y	28	Y	Y	NC	144,970.67	B	Y	Y	7
2017-211C	Pinacade at Fenwick	Broward	David O. Deutch	Pinacade Housing Group, LLC**	E	120	2,951,000.00	Y	33	Y	Y	NC	126,738.72	A	Y	Y	2
2017-212C	Preserve at Sabal Park	Hillsborough	Shawn Wilson	Blue Sky Communications III, LLC	F	144	2,110,000.00	Y	33	Y	Y	NC	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	Y	NC	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	Y	NC	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	Y	NC	127,082.73	A	Y	Y	12
2017-216C	Starford Point	Orange	Jonathan L. Wolf	Starford Point Developer, LLC	E	110	2,110,000.00	Y	28	Y	Y	NC	134,014.51	A	Y	Y	6
2017-217C	Channeled Senior Apartments	Hillsborough	Donald W. Parson	WOB Beneficial Development 16 LLC	E	80	2,090,000.00	Y	23	Y	Y	NC	137,156.25	A	Y	Y	34
2017-219C	Heritage at City View	Palm Beach	Robert G. Hostins	Nulford Development Partners, Inc.	E	100	2,018,500.00	Y	33	Y	Y	NC	127,980.66	A	Y	Y	22
2017-220C	Westport Village II at Riviera Beach	Palm Beach	Mara S. Wadda	Cornerstone Group Partners, LLC	E	80	1,445,000.00	Y	28	Y	Y	NC	126,194.35	A	Y	Y	20
2017-222C	Westport Village I at Riviera Beach	Palm Beach	Mara S. Wadda	Cornerstone Group Partners, LLC	F	108	1,945,000.00	Y	28	Y	Y	NC	125,822.38	A	Y	Y	25
2017-223C	Village View	Broward	Matthew Rieger	HTG View Developer, LLC	E	96	2,561,000.00	Y	28	Y	Y	NC	119,046.48	A	Y	Y	33
2017-224C	The Hudson	Pinellas	Matthew Rieger	HTG Hudson Developer, LLC	E	87	1,660,000.00	Y	28	Y	Y	NC	133,306.37	A	Y	Y	17
2017-225C	Barnett Villas	Orange	Alexander B. Kats	Bayview Development Group, LLC, Judd Roth Real Estate Development, Inc.	E	130	2,110,000.00	Y	28	Y	Y	NC	131,094.67	A	Y	Y	41
2017-226C	Lash Gardens	Duval	Janez R. Heuber	TVC Development, Inc.	E	100	1,570,718.00	Y	28	Y	Y	NC	126,865.68	A	Y	Y	24
2017-228C	Waterview Pointe	Orange	Matthew Rieger	HTG Waterview Pointe Developer, LLC	F	120	2,110,000.00	Y	28	Y	Y	NC	122,846.63	A	Y	Y	36
2017-229C	Georgan Gardens Apartments	Palm Beach	Aberto V. Hinojosa	Georgan Gardens Apartments Developer, LLC	E	87	1,650,000.00	Y	33	Y	Y	NC	132,503.32	A	Y	Y	9
2017-230C	The Boulevard at West River	Hillsborough	Eileen M. Pope	WROG Boulevard, LLC	F	200	2,110,000.00	Y	33	Y	Y	NC	73,767.98	A	Y	Y	10

Exh. A

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	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	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	NC	108,397.50	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	NC	138,468.75	B	Y	Y	40
2017-234C*	Birch Hollow	Orange	Matthew Heffer	HTG Birch Developer, LLC	E	120	1,625,000.00	Y	28	Y	Y	NC	142,187.50	B	Y	Y	37
2017-235C	Lofts at Lyllia on Monroe	Duval	James R. Hoover	TYC Development, Inc.	F	108	1,660,000.00	Y	33	Y	Y	NC	97,454.06	A	Y	Y	21
2017-236C	Compass Pointe	Orange	Brianne E. Heffer	Southport Development, Inc. a WVA corporation doing business in FL as	E	80	1,400,000.00	Y	28	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	NC	138,468.75	B	Y	Y	32
2017-239C	Byce Landing	Orange	Matthew Rieger	HTG Byce Developer, LLC	E	136	2,110,000.00	Y	28	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	NC	142,187.50	B	Y	Y	29
2017-241C	Saratoga Crossings	Broward	Elizabeth Wong Rieger	APC Saratoga Crossings I Development, LLC. Dania Beach Quality Housing.	F	128	2,561,000.00	Y	33	Y	Y	NC	116,817.55	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	NC	128,192.10	A	Y	Y	39

Ineligible Applications

2017-206C	The Promenade at West Lake	Broward	Clifton E. Phillips	Roundstone Development, LLC	E	75	1,789,658.00	N	20	Y	Y	NC	128,600.69		Y	Y	13
2017-208C	Venetian Isles	Pinellas	Kenneth K. Murphy	Royal American Development, Inc.; Green Mills Holdings, LLC	E	96	1,660,000.00	N	28	Y	Y	NC	109,635.82		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	NC	148,646.79		Y	Y	14
2017-221C	Wingate Apartments	Palm Beach	Maria S. Maldes	Cornerstone Group Partners, LLC	F	82	1,485,000.00	N	28	Y	Y	NC	126,524.51		Y	Y	35
2017-237C	CHANDLER'S CROSSING APARTMENTS	Orange	DEION R. LOWERY	DRJ CC DEVELOPMENT LLC	F	88	1,576,344.00	N	10	Y	Y	NC	125,149.86		Y	Y	16
2017-237C	ETHAN'S WALK APARTMENTS	Orange	DEION R. LOWERY	DRJ EV DEVELOPMENT LLC	E	88	1,576,344.00	N	10	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 67-50.009, 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 2016-13 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
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Broward County Application												
2017-211C	Pinnacle at Peacefield	Broward	David O. Deutch	Pinnacle Housing Group, LLC*	2,561,000.00	33	Y	Y	A	Y	Y	2

Duval County Application												
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

Hillsborough County Application												
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

Orange County Application												
2017-200C	Paramore Oaks	Orange	Paula M Rhodes	inVirus Development, LLC	2,110,000.00	33	Y	Y	B	Y	Y	11

Palm Beach County Application												
2017-229C	Georgian Gardens Apartments	Palm Beach	Alberto Milio, Jr.	Georgian Gardens Apartments	1,650,000.00	33	Y	Y	A	Y	Y	9

Pinellas County Application												
2017-201C	Heritage Oaks	Pinellas	Brian D EYen	Neostar Development USA, LP, PCHA	1,660,000.00	33	Y	Y	A	Y	Y	15

2nd Broward County Application												
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.

Maureen McCarthy Daughton, LLC

MMD LAW

Maureen McCarthy Daughton, LLC
1725 Capital Circle NE, Suite 304
Tallahassee, Florida 32308

T: (850) 345-8251
Mdaughton@mmd-lawfirm.com
www.mmd-lawfirm.com

Via Hand Delivery and Email
May 10, 2017

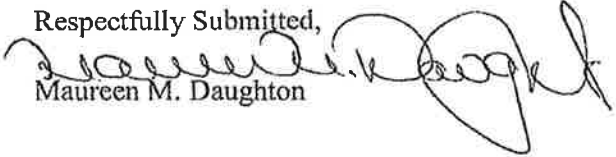
Ms. Kate Flemming (Kate.Flemming@Floridahousing.org)
Corporation Clerk
Florida Housing Finance Corporation
227 North Bronough, Suite 5000
Tallahassee, Florida 32301

**RE: Notice of Intent to Protest, Request for Applications (RFA) 2016-113 Proposed
Funding Selections**

Dear Corporation Clerk:

On behalf of Applicant, HTG Bryce, LLC, Application No. 2017-239C, we hereby give notice of our intent to protest the Award Notice and Scoring and Ranking of RFA 2016-113 posted by Florida Housing Finance Corporation on May 5, 2017 at 9:58 a.m., concerning Housing Credit Financing for Affordable Housing developments located in Broward, Duval, Hillsborough, Orange, Palm Beach and Pinellas Counties (See Attached).

A formal written petition will be submitted within ten (10) days of this Notice as required by law.

Respectfully Submitted,

Maureen M. Daughton

cc: Hugh Brown, General Counsel

- Exh. B -

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
Broward County Application												
2017-211C	Pinnacle at Peacefield	Broward	David O. Deutch	Pinnacle Housing Group, LLC*	2,561,000.00	33	Y	Y	A	Y	Y	2
Duval County Application												
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
Hillsborough County Application												
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
Orange County Application												
2017-200C	Parramore Oaks	Orange	Paula M Rhodes	InVictus Development, LLC	2,110,000.00	33	Y	Y	B	Y	Y	11
Palm Beach County Application												
2017-229C	Georgian Gardens Apartments	Palm Beach	Alberto Millo, Jr.	Georgian Gardens Apartments	1,650,000.00	33	Y	Y	A	Y	Y	9
Pinellas County Application												
2017-201C	Heritage Oaks	Pinellas	Brian D Evjen	Nonstar Development USA, LP-PCHA	1,660,000.00	33	Y	Y	A	Y	Y	15
2nd Broward County Application												
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

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WELLS LANDING

REPLATING

SHEET 1 OF 2

PLAT BOOK 73 PAGE 121

LOTS 6 & 7 FIRST ADDITION TO WESTERN TERRACE, PLAT BOOK "H", PAGE 64
PARRAMORE VILLAGE, PLAT BOOK 1, PAGE 48
PARRAMORE VILLAGE - FIRST REPLAT, PLAT BOOK 1, PAGE 64
PARRAMORE VILLAGE - SECOND REPLAT, PLAT BOOK 1, PAGE 70
LOT 1, SUNCHARM SUBDIVISION, PLAT BOOK 35, PAGE 80
SECTION 35, TOWNSHIP 22 SOUTH, RANGE 29 EAST,
CITY OF ORLANDO, ORANGE COUNTY, FLORIDA

LEGAL DESCRIPTION

LOTS 6 AND 7, FIRST ADDITION TO WESTERN TERRACE, AS RECORDED IN PLAT BOOK "H", PAGE 64, PARRAMORE VILLAGE, AS RECORDED IN PLAT BOOK 1, PAGE 48, PARRAMORE VILLAGE - FIRST REPLAT, AS RECORDED IN PLAT BOOK 1, PAGE 64, PARRAMORE VILLAGE - SECOND REPLAT, AS RECORDED IN PLAT BOOK 1, PAGE 70 AND LOT 1, SUNCHARM SUBDIVISION, AS RECORDED IN PLAT BOOK 35, PAGE 80, ALL IN THE PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA, AND A PORTION OF THE NORTHWEST 1/4 OF SECTION 35, TOWNSHIP 22 SOUTH, RANGE 29 EAST, ORANGE COUNTY, FLORIDA, ALL MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF PARRAMORE VILLAGE FIRST REPLAT, AS RECORDED IN PLAT BOOK 1, PAGE 64, PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA, RUN N00°48'36"W, ALONG THE WEST LINE OF SAID PARRAMORE VILLAGE FIRST - REPLAT AND THE WEST LINE OF PARRAMORE VILLAGE SECOND - REPLAT, AS RECORDED IN PLAT BOOK 1, PAGE 70, AND THE WEST LINE OF LOT 1, FIRST ADDITION TO WESTERN TERRACE, AS RECORDED IN PLAT BOOK "H", PAGE 64, ALL RECORDED IN THE PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA, A DISTANCE OF 343.03 FEET TO THE NORTHWEST CORNER OF SAID LOT 1, THENCE N89°51'06"E, ALONG THE NORTH LINE OF SAID LOT 1 AND THE NORTH LINE OF LOT 6 OF SAID FIRST ADDITION TO WESTERN TERRACE, A DISTANCE OF 94.24 FEET TO A POINT ON THE WEST LINE OF THE AFORESAID PARRAMORE VILLAGE SECOND - REPLAT THENCE N00°31'56"W, ALONG SAID WEST LINE, A DISTANCE OF 59.95 FEET TO THE NORTHWEST

CORNER OF SAID PARRAMORE VILLAGE SECOND - REPLAT, THENCE N89°52'44"E, ALONG THE NORTH LINE OF SAID PARRAMORE VILLAGE SECOND - REPLAT AND THE NORTH LINE OF SAID PARRAMORE VILLAGE SECOND - REPLAT, PLAT BOOK 1, PAGE 48, PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA, A DISTANCE OF 208.70 FEET, THENCE S00°31'55"E, A DISTANCE OF 1.44 FEET, THENCE N89°52'44"E, A DISTANCE OF 60.57 FEET TO SOUTHWEST CORNER OF LOT 1, SUNCHARM SUBDIVISION, AS RECORDED IN PLAT BOOK 35, PAGE 80, PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA, THENCE N00°31'12"W, ALONG THE WEST LINE OF SAID LOT 1, A DISTANCE OF 194.77 FEET TO THE NORTHWEST CORNER OF SAID LOT 1, THENCE N89°45'58"E, ALONG THE NORTH LINE OF SAID LOT 1, A DISTANCE OF 119.56 FEET, THENCE S45°02'47"E, ALONG SAID NORTH LINE, A DISTANCE OF 21.21 FEET TO THE EAST LINE OF SAID LOT 1, THENCE S00°31'12"W, ALONG THE EAST LINE OF SAID LOT 1, AND THE EAST LINE OF THE AFORESAID PARRAMORE VILLAGE AND ITS SOUTHERLY EXTENSION, A DISTANCE OF 583.12 FEET TO THE POINT OF INTERSECTION OF THE WEST RIGHT-OF-WAY LINE OF PARRAMORE AVENUE, 14.60.00 FOOT RIGHT-OF-WAY) AND THE NORTH RIGHT-OF-WAY LINE OF CONLEY STREET, (BEING 20.00 FEET NORTH OF AND PARALLEL WITH THE SOUTH LINE OF THE NORTH 1/2 OF THE SOUTHWEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 35, TOWNSHIP 22 SOUTH, RANGE 29 EAST); THENCE N89°56'28"W, ALONG THE NORTH RIGHT-OF-WAY LINE OF SAID CONLEY STREET, A DISTANCE OF 496.00 FEET TO THE POINT OF BEGINNING, CONTAINING 5.07 ACRES MORE OR LESS.

NOTICE

THIS PLAT, AS RECORDED IN ITS ORIGINAL FORM, IS THE OFFICIAL RECORD OF THE PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA. IT WILL IN NO CIRCUMSTANCES BE SUPERSEDED IN AUTHORITY BY ANY OTHER GRAPHIC OR DIGITAL FORM OF THE PLAT. THERE MAY BE ADDITIONAL RESTRICTIONS THAT ARE NOT RECORDED ON THIS PLAT THAT MAY BE FOUND IN THE PUBLIC RECORDS OF THIS COUNTY.



820 SOUTH MARNOVA AVENUE
ORLANDO, FLORIDA 32809
(407) 843-9320 FAX (407) 849-8664
CERTIFICATE OF AUTHORIZATION NO. LB 1211



SITE LOCATION MAP
NOT TO SCALE

CERTIFICATE OF REVIEW
BY CITY SUPERVISOR
[Signature]
9/10/09

DEDICATION

I, *[Signature]*, Director of Planning & Development, Orange County, Florida, hereby certify that the above described property is dedicated to the public use of the County of Orange, Florida, and that the same shall be subject to the provisions of the Ordinance, Chapter 2008-12, of the County of Orange, Florida, which provides for the dedication of property to the public use of the County of Orange, Florida.

CERTIFICATE OF APPROVAL BY CITY ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY MUNICIPALITY

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

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Examined & Approved: *[Signature]*
Date: 9-10-09

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CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

CERTIFICATE OF APPROVAL BY PROFESSIONAL ENGINEER

Examined & Approved: *[Signature]*
Date: 9-10-09

Exh. C

NOTICE
 THE PLAN IS PREPARED BY THE ENGINEER, IN THE OFFICE OF THE ENGINEER, AND IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN AUTHORITY OF THE ENGINEER. THE ENGINEER HAS CONDUCTED A VISUAL INSPECTION OF THE SITE AND HAS FOUND NO OBVIOUS ERRORS OR OMISSIONS. THE ENGINEER IS NOT RESPONSIBLE FOR ANY CHANGES OR MODIFICATIONS TO THE PLAN MADE BY ANY OTHER PARTY.

DATE DATA

DATE	REVISION	BY	DESCRIPTION
11/15/23	1	AS	ISSUE FOR PERMIT
11/15/23	2	AS	REVISION TO PERMIT
11/15/23	3	AS	REVISION TO PERMIT
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11/15/23	22	AS	REVISION TO PERMIT

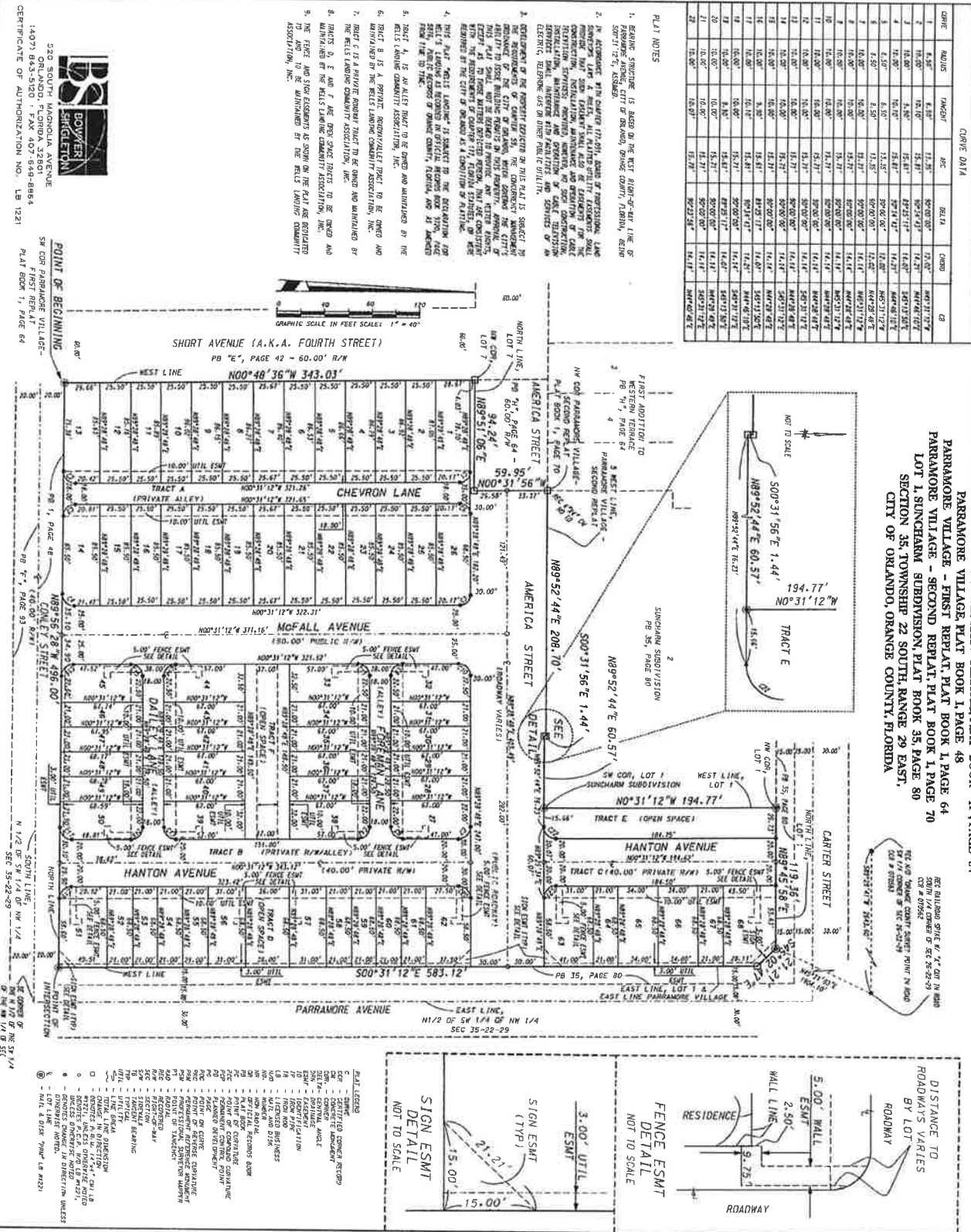
PLAT NOTES

1. BEARING STRUCTURE IS BASED ON THE WEST HIGH-DRAW LINE OF SECTION 22, EAST.
2. IN ACCORDANCE WITH CHAPTER 173.04, STATE OF FLORIDA, LAND SURVEYORS LAW AND RULES, ALL EXISTING UTILITY LOCATIONS SHOWN ON THIS PLAN SHALL BE EXAMINED BY THE SURVEYOR PRIOR TO THE COMMENCEMENT OF THE SURVEY. THE SURVEYOR SHALL BE RESPONSIBLE FOR THE LOCATION, DEPTH, AND CHARACTER OF ALL EXISTING UTILITIES. THE SURVEYOR SHALL BE RESPONSIBLE FOR THE LOCATION, DEPTH, AND CHARACTER OF ALL EXISTING UTILITIES. THE SURVEYOR SHALL BE RESPONSIBLE FOR THE LOCATION, DEPTH, AND CHARACTER OF ALL EXISTING UTILITIES.
3. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF THE SITE AND HAS FOUND NO OBVIOUS ERRORS OR OMISSIONS. THE SURVEYOR IS NOT RESPONSIBLE FOR ANY CHANGES OR MODIFICATIONS TO THE PLAN MADE BY ANY OTHER PARTY.
4. THIS PLAT SHOWS THE LOTS TO BE CREATED BY THE SURVEY. THE SURVEYOR HAS CONDUCTED A VISUAL INSPECTION OF THE SITE AND HAS FOUND NO OBVIOUS ERRORS OR OMISSIONS. THE SURVEYOR IS NOT RESPONSIBLE FOR ANY CHANGES OR MODIFICATIONS TO THE PLAN MADE BY ANY OTHER PARTY.
5. TRACT 4, IS AN ALLEY TRACT TO BE OWNED AND MAINTAINED BY THE WELLS LANDING COMMUNITY ASSOCIATION, INC.
6. TRACT 8 IS A PRIVATE ROADWAY TRACT TO BE OWNED AND MAINTAINED BY THE WELLS LANDING COMMUNITY ASSOCIATION, INC.
7. TRACT 12 IS A PRIVATE ROADWAY TRACT TO BE OWNED AND MAINTAINED BY THE WELLS LANDING COMMUNITY ASSOCIATION, INC.
8. TRACTS 9, 5 AND 7 ARE OPEN SPACE TRACTS TO BE OWNED AND MAINTAINED BY THE WELLS LANDING COMMUNITY ASSOCIATION, INC.
9. THE FENCE AND SIGN ESMAT AS SHOWN ON THE PLAN ARE REQUIRED TO AND TO BE MAINTAINED BY THE WELLS LANDING COMMUNITY ASSOCIATION, INC.

WELLS LANDING

REPLACING
 LOTS 6 & 7 FIRST ADDITION TO WESTERN TERRACE PLAT BOOK 7TH, PAGE 64
 PARAMORE VILLAGE - FIRST REPLAT PLAT BOOK 1, PAGE 48
 PARAMORE VILLAGE - SECOND REPLAT PLAT BOOK 1, PAGE 64
 LOT 1 SUNCHAM SUBDIVISION PLAT BOOK 1, PAGE 70
 SECTION 35, TOWNSHIP 22 SOUTH, RANGE 29 EAST,
 CITY OF ORLANDO, ORANGE COUNTY, FLORIDA

PLAT BOOK 73 PAGE 122
 SHEET 2 OF 2



320 SOUTH MAGNOLIA AVENUE
 ORLANDO, FLORIDA 32808
 (407) 643-9100
 CERTIFICATE OF AUTHORIZATION NO. LB 1231



POINT OF BEGINNING - SW COR PARADISE VILLAGE - 5th COR FIRST REPLAT PLAT BOOK 1, PAGE 64

- PLAT LEGEND**
- 1. SHOWN TO CORNER RECORD
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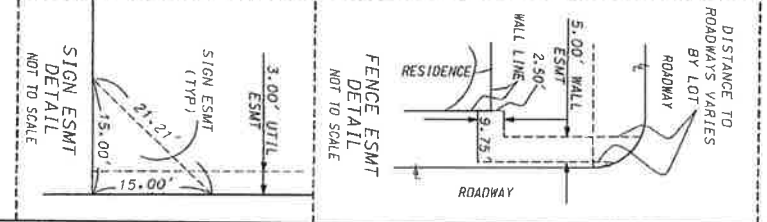
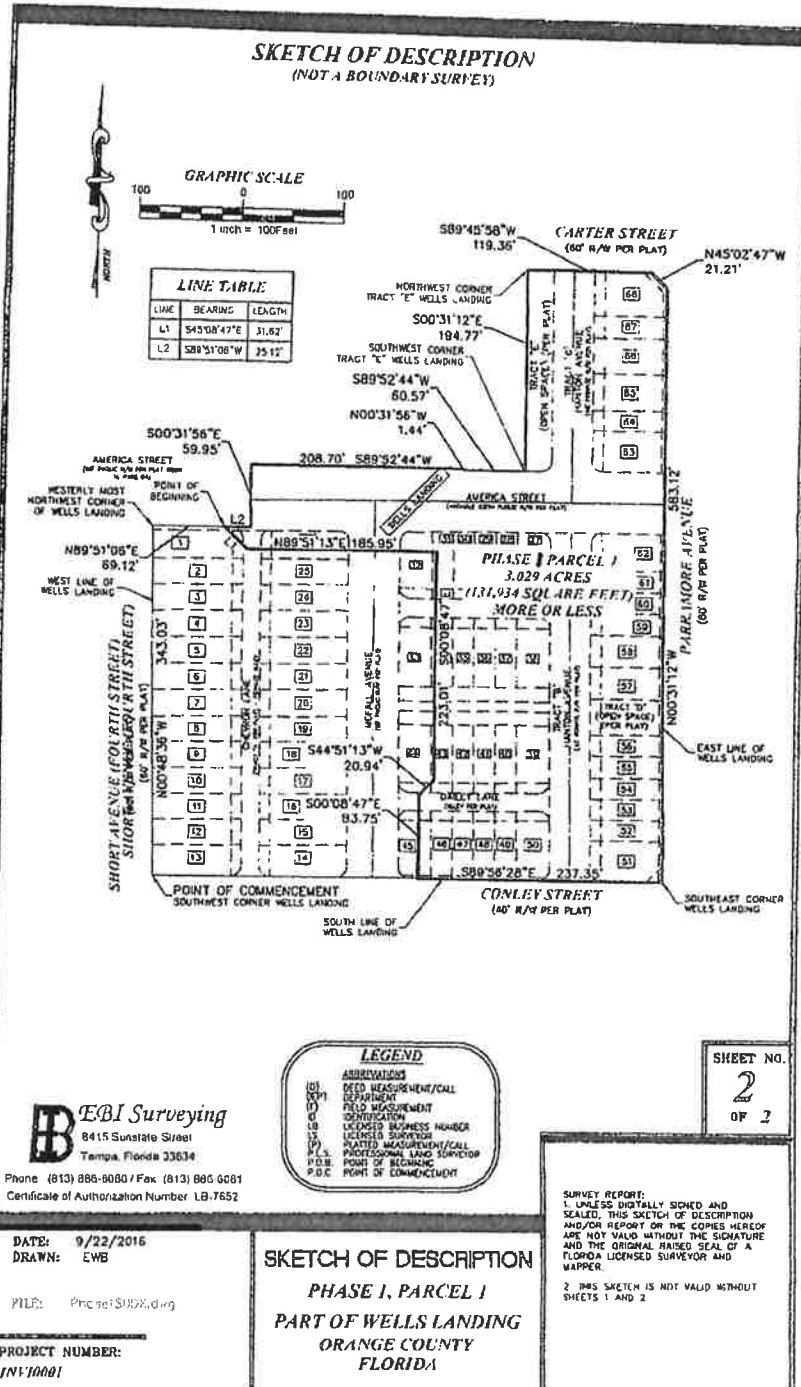


EXHIBIT "A"

SKETCHES AND DESCRIPTIONS OF PROPERTY



1086044444

Exh. D