

**STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

HAWTHORNE PARK, LTD., AND
HAWTHORNE PARK DEVELOPER, LLC,
Petitioners,

vs.

FHFC Case No.: 2018-014BP
APPLICATION NO: 2018-273C
REQUEST FOR APPLICATIONS: 2017-113

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

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

Pursuant to sections 120.569 and 120.57(3), Florida Statutes, and Chapter 28-110 and rule 28-106.201, Florida Administrative Code (“Fla. Admin. Code”), Petitioners, Hawthorne Park, Ltd., and Hawthorne Park Developer, LLC (collectively, “Petitioners”), file this Formal Written Protest of Award and Petition for Administrative Hearing and state:

Affected Agency

1. The agency affected is the Florida Housing Finance Corporation (“Florida Housing”), 227 N. Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329. The telephone number is 850-488-4197.

Petitioners

2. Petitioners’ address is 1105 Kensington Park Drive, Suite 200, Altamonte Springs, Florida 32174. Petitioners’ telephone number is 407-333-3233. For purposes of this proceeding, Petitioners’ address is that of its undersigned counsel.

3. Petitioner Hawthorne Park, Ltd. (“Hawthorne Park”) is the Applicant entity of a proposed affordable housing development to be located in Orange County, Application #2018-

273C. Hawthorne Park Developer, LLC is a “Developer” entity as defined by Florida Housing in Rule 67-48.002(28), Fla. Admin. Code.

4. Petitioners are challenging the eligibility for funding under Request for Applications 2017-113, Housing Credit Financing for Affordable Housing Developments Located in Broward, Duval, Hillsborough, Orange, Palm Beach and Pinellas Counties (the “RFA” or “RFA-2017-113”) of applicant West Lakes Phase II, LP (“West Lakes”), for its failure to meet eligibility and Total Point requirements for an award of Housing Credits through an administrative hearing before the Department of Administrative Hearing (“DOAH”).

Petitioners’ Counsel

5. Counsel for Petitioners and Petitioners' address for this proceeding is:

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Craig D. Varn
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Background

6. Florida Housing administers various affordable housing programs including the Housing Credit (HC) Program pursuant to Section 42 of the Internal Revenue Code (the “IRC” or “the Code”) and section 420.5099, Florida Statutes (“Fla. Stat.”), under which 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 IRC, and Chapters 67-48 and 67-60, Fla. Admin. Code.

7. Florida Housing administers a competitive solicitation process to implement the provisions of the housing credit program under which developers apply for funding. Chapter 67-60, Fla. Admin. Code.

8. Rule 67-60.006, Fla. Admin. Code, provides that “[t]he failure of an Applicant to supply required information in connection with any competitive solicitation pursuant to this rule chapter shall be grounds for a determination of nonresponsiveness with respect to its Application.”

9. Furthermore, by applying, each applicant certifies that:

Proposed Developments funded under this RFA will be subject to the requirements of the RFA, inclusive of all Exhibits, the Application requirements outlined in Rule Chapter 67-60, F.A.C., the requirements outlined in Rule Chapter 67-48, F.A.C. and the Compliance requirements of Rule Chapter 67-53, F.A.C.

(RFA at pg. 6).

10. Because the demand for HC funding exceeds that which is available under the HC Program, qualified affordable housing developments must compete for this funding. To assess the relative merits of proposed developments, pursuant Chapters 67-48 and 67-60, Fla. Admin. Code, Florida Housing has established by rule a competitive solicitation process known as the Request for Applications.

11. Florida Housing issued RFA 2017-113 on or about October 6, 2017. The application deadline for the RFA as modified was December 28, 2017 (“Application Deadline”).

12. The RFA sets forth the information required to be provided by an applicant, which includes a general description of the type of projects that will be considered eligible for funding and delineates the submission requirements. (RFA at pp. 2-62). The RFA sets forth on Pages 63 and 66, a list of mandatory Eligibility and Point Items that must be included in a

response. The RFA expressly provides that “[o]nly Applications that meet all of the Eligibility Items will be eligible for funding and considered for funding selection.” (RFA at pg. 63).

13. Among other things, to satisfy eligibility and Total Point requirements, the RFA requires the applicant to accurately complete “The Principals of the Applicant and Developer(s) Disclosure Form (Form Rev. 16) (‘Principals Disclosure Form’).” (RFA at pg. 2). “The Principals Disclosure Form must identify the Principals of the Applicant and Developer(s) **as of the Application Deadline** and should include, for each applicable organizational structure, only the types of Principals required by Subsection 67-48.002(93), F.A.C.” (Emphasis added) (RFA at pg. 11). Because this requirement is considered an “Eligibility Item” failure to comply deems the application ineligible for funding. (RFA at pg. 63).

14. Specifically, Florida Housing’s solicitation process for RFA 2017-113, as set forth in Rules 67-60.001 - .009, Fla. Admin. Code, involves the following:

- a) Florida Housing publishes its competitive solicitation (RFA) in the Florida Administrative Register;
- b) applicants prepare and submit their response to the competitive solicitation;
- c) Florida Housing appoints a scoring committee (“Review Committee”) to evaluate the applications;
- d) the scoring committee makes recommendations to Florida Housing’s Board, which are then voted on by the Board; and
- e) applicants not selected for funding may protest the results of the competitive solicitation process.

15. On or about February 22, 2018, the Review Committee, which consisted of Florida Housing staff, met and considered the applications responding to the RFA. At the meeting the Review Committee listed and manually input the scores for each application and ultimately made recommendations to the Florida Housing Board of Directors (“Board”) for their

consideration. The Review Committee determined that Hawthorne Park was eligible, but not selected for funding. Rather, West Lakes was selected for funding in Orange County, with Hawthorne Park being next in line for funding in Orange County.

16. On March 16, 2018, Florida Housing's Board of Directors adopted the Review Committee's recommendations and tentatively authorized the selection for funding of those applications identified in RFA 2017-113 Board Approved Preliminary Awards report, which included West Lakes. (See attached Exhibit "A").

Notice of Agency Action

17. Petitioners received notice of Florida Housing's Final Agency Action entitled "RFA 2017-113 Board Approved Preliminary Awards" dated March 16, 2018 ("Corporation's Notice"), on or about March 16, 2018. (See attached Exhibit "A").

Notice of Protest

18. On March 21, 2018, Petitioners timely filed their Notice of Protest in which it challenged the selection of the applications in the Corporation's Notice (See attached Exhibit "B").

Substantial Interests

19. Petitioners timely submitted an application in response to the RFA, Application #2018-273C ("Application"). In their Application, Petitioners sought an allocation of \$2,110,000 in annual federal tax credits¹ to help finance the development of their project, a 116-

¹ The United States Congress has created a program, governed by Section 42 of the IRC, by which federal income tax credits are allotted annually to each state on a per capita basis to help facilitate private development of affordable low-income housing for families. These tax credits entitle the holder to a dollar-for-dollar reduction in the holder's federal tax liability, which can be taken for up to ten years if the project continues to satisfy IRC requirements. The tax credits allocated annually to each state are awarded by state "housing credit agencies" to single-purpose applicant entities created by real estate developers to construct and operate specific multi-family

unit Garden Apartment complex. As reflected in RFA 2017-113, All Applications Report, Petitioners were assigned lottery number 3. Petitioners were scored as having satisfied all mandatory and eligibility requirements for funding and scored 15 out of 20 Total Points. (See RFA 2017-113 All Applications Report, attached as Exhibit “C”).

20. West Lakes timely submitted an application in response to the RFA, Application #2018-274C. In its application, West Lakes sought an allocation of \$2,110,000 in annual federal tax credits to help finance the development of its project, a 120-unit Garden Apartments complex. As reflected in RFA 2017-113 All Applications Report, West Lakes was assigned lottery number 22. West Lakes was scored as having satisfied all mandatory and eligibility requirements for funding receiving a score of 20 out of 20 Total Points. (See RFA 2017-113 All Applications Report, attached as Exhibit “C”).

21. West Lakes failed to meet or satisfy RFA eligibility and Total Points requirement, and is not entitled to the eligibility determination, scoring, and preliminary ranking of their application. As a result of the preliminarily ranking process, West Lakes was incorrectly included in the funded rankings and should have been scored lower than Petitioners’ Application. As discussed below, Florida Housing improperly determined that West Lakes satisfied RFA mandatory, eligibility, and Total Points requirements and improperly selected West Lakes for funding.

housing projects. The applicant entity then sells this ten-year stream of tax credits, typically to a syndicator, with the sale proceeds generating much of the funding necessary for development and construction of the project. The equity produced by this sale of tax credits in turn reduces the amount of long-term debt required for the project, making it possible to operate the project at below-market-rate rents that are affordable to low-income and very-low-income tenants. Pursuant to section 420.5099, Fla. Stat., Florida Housing is the designated “housing credit agency” for the State of Florida and administers Florida’s tax credit program under its Housing Credit Program (“HC Program”). Through the HC Program, Florida Housing allocates Florida’s annual fixed pool of federal tax credits to developers of affordable housing.

22. Through this proceeding Petitioners challenge and are seeking a determination that Florida Housing erred in the scoring and eligibility, and the decision to award Housing Credits to West Lakes. But for Florida Housing's error in its scoring, eligibility, and award decision as to the West Lakes application, Petitioners would have been ranked in the funded range and would have been entitled to an allocation of housing credits from RFA 2017-113. The defect in the West Lakes application will be addressed below.

Principals Disclosure Form

23. In order to satisfy RFA submission requirements, the RFA requires an applicant to completely disclose all principals of the Applicant and its Developer(s).

24. In order to satisfy this eligibility requirement, the RFA requires the applicant to include within its application a properly completed Principals of the Applicant and Developer(s) Disclosure Form ("Principals Disclosure Form"). The Principals Disclosure Form is an Excel spreadsheet, which includes specific instructions as to how to complete the form. The instructions require an applicant to accurately and completely disclose the Applicant and Developer entities as well as the corporate structure that makes up these entities. The disclosure requirements vary depending on the corporate structure. For instance, if an Applicant or Developer is a corporation, the RFA requires disclosure of all officers, shareholders and directors of the company.² Where the Applicant or Developer is a limited liability company, the RFA requires the disclosure of all managers and members of such entities.

25. Importantly, in the Principals Disclosure Form for applicants, the RFA requires that the "organizational structure of the Third Level Principal identified Must Be a Natural Person." To that end, the Principals Disclosure Form provides multitiered disclosure levels. For

² If an Applicant is a corporation, the RFA further requires disclosure of all executive directors.

instance, if the Developer is a limited liability company, whose manager/member is a corporation, the applicant must disclose: 1) at the primary level, the name of the corporation who is the manager/member of the limited liability company; and 2) at the secondary level, the natural persons who make up the officers, directors and shareholders of the corporation who is the manager/member of the limited liability company.

26. Specifically, the RFA at Section Four (3)(d) requires the disclosure of the following information:

Principals Disclosure for the Applicant and for each Developer (5 points)

(1) Eligibility Requirements

To meet the submission requirements, the Applicant must upload the Principals of the Applicant and Developer(s) Disclosure Form (Form Rev. 08-16) (“Principals Disclosure Form”) with the Application and Development Cost Pro Forma, 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 should include, for each applicable organizational structure, only the types of Principals required by Subsection 67-48.002(93), F.A.C. A Principals Disclosure Form should not include, for any organizational structure, any type of entity that is not specifically included in the Rule definition of Principals.

(2) Point Item

Applicants will receive 5 points if the uploaded Principal Disclosure Form was stamped “Approved” during the Advance Review Process provided (a) it is still correct as of the Application Deadline, and (B) it was approved with the type of funding requested (i.e., Housing Credits or Non—Housing Credits).

(RFA at pp. 10-11).

27. Rule 67–48.002(93), Fla. Admin. Code, defines Principal, in relevant, part as follows:

(a) With respect to an Applicant that is:

. . .

2. A **limited partnership**, at the first principal disclosure level, any general partner or limited partner of the Applicant limited partnership, and, unless otherwise excluded at subsection 67-48.009(9), F.A.C., with respect to any general partner or limited partner of the Applicant limited partnership, at the second disclosure level, that is:

a. A corporation, any officer, director, executive director, or shareholder of the corporation.

(b) With respect to a Developer that is:

3. A **limited liability company** at the first principal disclosure level, any manager or member of the Developer limited liability company, and, with respect to any manager or member of the Developer limited liability company that is:

a. A corporation, at the second principal disclosure level, any officer, director or shareholder of the corporation.

28. As provided in the RFA, every Applicant entity must accurately and completely disclose all officers and members of its board of directors of any corporation which is a member of an Applicant who is a limited partnership. Further, every Developer entity must disclose all officers and members of its board of directors of any corporation which is a member of a Developer who is a limited liability company.

29. West Lakes included within its application the attached Principals Disclosure Form. (See attached Exhibit D). West Lakes Phase II, LP is identified as the Applicant. At the First disclosure level, West Lakes identifies LIFT Orlando, Inc. as its general partner. At the Second disclosure level West Lakes identifies a list of “natural persons” who allegedly comprise all the officers and members of its board of directors of LIFT Orlando, Inc.

30. With respect to the Developer structure, West Lakes identifies LIFT Orlando Community Development, LLC as a Co-Developer. At the First disclosure level, West Lakes identifies LIFT Orlando, Inc. as the member and manager of LIFT Orlando Community Development, LLC. At the Second disclosure level West Lakes identifies a list of “natural

persons” who allegedly comprise all the officers and members of its board of directors of LIFT Orlando, Inc.

31. Contrary to the requirements of the RFA, in its Principals Disclosure Form, West Lakes failed to identify all of Lift Orlando’s officers and members of its board of directors. In light of the forgoing defects in its application, West Lakes failed to satisfy RFA requirements and cannot be selected for funding and should be scored as ineligible for an award of funding.

32. Alternatively, West Lakes failure to identify all of the officers and members of the board of directors, would result in the loss of the 5 points granted pursuant to Section Four (3)(d)(2) of the RFA as the Principal Disclosure Form was not “correct as of Application Deadline.” (RFA at p. 11).

33. Absent those additional 5 points, the West Lakes application would have been entitled to only 15 Total Points and, therefore, been tied with Petitioners. Because Petitioners received a lower lottery number, Petitioners would then have been selected for funding ahead of West Lakes.

Issues of Material Fact and Law

34. Disputed issues of material fact and law include those matters pled in this petition, and include but are not limited to the following:

a) Whether the provisions of the RFA have been followed with respect to the proposed allocation of tax credits and funds to West Lakes under the RFA or correct eligibility determinations have been made based on the provisions of the RFA;

b) Whether the proposed allocation of the tax credits and funds to West Lakes are consistent with the RFA, the requirements of a competitive procurement process and Florida Housing’s rules and governing statutes;

c) Whether the RFA’s criteria for determining eligibility, ranking and evaluation of proposals were properly followed;

d) Whether the preliminary rankings properly determine the eligibility of potential applicants for funding in accordance with the standards and provisions of the RFA;

e) Whether the rankings and proposed awards are consistent with the RFA and the disclosed bases or grounds upon which tax credits are to be allocated;

f) Whether the rankings and proposed awards are based on a correct determination of the eligibility of the applicants or correct scoring and ranking criteria in the RFA;

g) Whether the rankings and proposed awards are consistent with fair and open competition for the allocation of tax credits;

h) Whether the rankings and proposed awards are based on clearly erroneous or capricious eligibility determinations, scoring or ranking;

i) Whether the proposed awards improperly incorporate new policies and interpretations that impermissibly deviate from the RFA specifications, existing rules or prior Florida Housing interpretations and precedents;

j) Whether West Lakes' Application should be deemed ineligible under the RFA because of its failure to satisfy RFA requirements with respect to properly disclosing Applicant and Developer principals;

k) Whether West Lakes' Application should be entitled to be awarded 5 Total Points for its Principals Disclosure Form.

l) Whether the criteria and procedures for the scoring, ranking and eligibility determination of West Lakes Application are arbitrary, capricious, contrary to competition, contrary to the RFA requirements, or are contrary to prior Florida Housing interpretations of the applicable statutes and administrative rules;

m) Whether the RFA's criteria for determining eligibility, ranking and evaluation of the West Lakes' Application were properly followed;

n) Whether West Lakes' eligibility determination and ranking is consistent with fair and open competition for the allocation of tax credits;

o) Whether West Lakes' eligibility determination and ranking are based on clearly erroneous or capricious eligibility determination, scoring or ranking;

p) Whether West Lakes' eligibility determination and ranking improperly incorporate new policies and interpretations that impermissibly deviate from the RFA specifications, existing rules or prior Florida Housing interpretations and precedents; and,

q) Such other issues as may be revealed during the protest process.

35. Petitioners reserve the right to seek leave to amend this petition to include additional disputed issues of material fact and law that may become known through discovery.

Statement of Ultimate Facts and Law

36. As a matter of ultimate fact and law West Lakes failed to complete their application in accordance with the competitive solicitation; their application was not responsive to and failed to comply with RFA 2017-113; and, therefore, their application should not have been considered for funding or scored as being an eligible application.

37. As a matter of ultimate fact and law Florida Housing improperly determined that West Lakes application was completed in accordance with the competitive solicitation; were responsive to RFA 2017-113 and, were eligible for funding under RFA 2017-113.

38. As a matter of ultimate fact and law Florida Housing improperly scored West Lakes' Application as having satisfied all mandatory element requirements as of the Application Deadline.

39. As a matter of ultimate fact and law, Florida Housing improperly determined that West Lakes was eligible for funding.

40. As a matter of ultimate fact and law, Florida Housing improperly determined that West Lakes was entitled to be awarded 5 Total Points for its Principals Disclosure Form.

41. As a matter of ultimate fact and law, but for these errors in West Lakes' Application, Petitioners would have been entitled to an allocation of its requested tax credit funding.

Statutes and Rules

Statutes and rules governing this proceeding are sections 120.569 and 120.57(3), and Chapter 420, Fla. Stat., and Chapters 28-106, 67-48 and 67-40, Fla. Admin. Code.

WHEREFORE, Petitioners request that:

A. Florida Housing refer this Petition to the Division of Administrative Hearings for a formal administrative hearing and the assignment of an Administrative Law Judge pursuant to section 120.57(3), Fla. Stat.;

B. The Administrative Law Judge enter a Recommended Order determining that:

1) West Lakes failed to complete their applications in accordance with the competitive solicitation; that their applications were non-responsive to and failed to comply with RFA 2017-113; and that their applications should not have been scored as having satisfied mandatory eligibility or Total Point requirements as prescribed by RFA 2017-113;

2) Florida Housing improperly determined that the application submitted by West Lakes was completed in accordance with the competitive solicitation;

3) Florida Housing improperly determined that the application submitted by West Lakes was responsive to RFA 2017-113;

4) Florida Housing improperly determined that West Lakes application were eligible for funding under RFA 2017-113;

C. The Administrative Law Judge enter a Recommended Order recommending Florida Housing award Petitioners their requested tax credit funding;

D. Florida Housing enter a Final Order awarding Petitioners their requested tax credit funding; and,

E. Petitioners be granted such other relief as may be deemed appropriate.

Respectfully submitted this 30th day of March, 2018.



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813-514-4701 (fax)

CERTIFICATE OF SERVICE

I certify that the foregoing has been filed by electronic mail to the Corporation Clerk, Florida Housing Finance Corporation, 227 N. Bronough Street, Suite 5000, Tallahassee, Florida 32301 (CorporationClerk@floridahousing.org) and a copy furnished via email to Hugh Brown, Esq., General Counsel, Florida Housing Finance Corporation, 227 N. Bronough Street, Suite 5000, Tallahassee, Florida 32301 (Hugh.Brown@floridahousing.org) this 30th day of March, 2018.



Craig D. Varn

RFA 2017-113 Board Approved Preliminary Awards

Total HC Available for RFA	14,601,863.00
Total HC Allocated	13,898,000.00
Total HC Remaining	703,863.00

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	HC Funding Amount	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Funding Preference	Leveraging Classification	Florida Job Creation Preference	Lottery Number
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Broward County Application

2018-284C	Sailboat Bend Apartments II	Broward	Kenneth Naylor	APC Sailboat Bend II Development, LLC; HEF-Dixie Court Development, LLC	2,561,000.00	Y	20	Y	Y	Y	A	Y	5
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Duval County Application

2018-293C	Lofts at Jefferson Station	Duval	James R. Hoover	TVC Development, Inc.	1,660,000.00	N	20	Y	Y	Y	A	Y	32
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Hillsborough County Application

2018-283C	The Boulevard at West River	Hillsborough	Jerome D Ryans	WRDG T3A Developer, LLC	2,110,000.00	N	20	Y	Y	Y	A	Y	15
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Orange County Application

2018-274C	Pendana at West Lakes Senior Residences	Orange	Eddy Moratin	New Affordable Housing Partners, LLC; LIFT Orlando Community Development, LLC	2,110,000.00	Y	20	Y	Y	Y	A	Y	22
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Palm Beach County Application

2018-286C	Ocean Breeze East	Palm Beach	Lewis V Swezy	RS Development Corp; Lewis Swezy	2,070,000.00	N	20	Y	Y	Y	A	Y	8
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Pinellas County Application

2018-304C	Eagle Ridge	Pinellas	Richard Higgins	Norstar Development USA, LP; Tarpon Springs Development, LLC	1,660,000.00	N	20	Y	Y	Y	B	Y	16
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RFA 2017-113 Board Approved Preliminary Awards

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	HC Funding Amount	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Funding Preference	Leveraging Classification	Florida Job Creation Preference	Lottery Number
Non-Profit Application or 2nd Broward County Application													
2018-279C	Marquis Apartments	Broward	Mara S. Mades	Cornerstone Group Partners, LLC	1,727,000.00	N	20	Y	Y	Y	A	Y	9

On March 16, 2018, 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 Applicants 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.

Michael G. Maida, P.A.

Attorney at Law

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Michael G. Maida
Civil Circuit Mediator

TELEPHONE (850)425-8124
TELECOPIER (850)681-0879

March 21, 2018

Via Hand Delivery
Via Electronic Mail: CorporationClerk@floridahousing.org

Ana McGlamory
Corporation Clerk
Florida Housing Finance Corporation
227 N. Bronough St., Ste. 5000
Tallahassee, FL 32301

RE: RFA 2017-113 Housing Credit Financing for Affordable Housing
Developments Located in Broward, Duval, Hillsborough, Orange,
Palm Beach and Pinellas Counties ("the RFA") - Notice of Protest

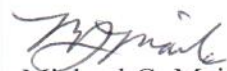
Dear Ms. McGlamory:

On behalf of applicant Hawthorne Park, Ltd., Application No. 2018-273C ("Hawthorne Park") and developer Hawthorne Park Developer, LLC, ("Hawthorne Park Developer"), this letter constitutes a Notice of Protest ("Notice") filed pursuant to sections 120.569 and 120.57(3), Florida Statutes, Rules 28-110 and 67-60.009, Florida Administrative Code and the RFA. Hawthorne Park and Hawthorne Park Developer protest Florida Housing Finance Corporation's ("Corporation") intended decision with respect to the scoring, ranking and selection of applications in the RFA, including but not limited to those applications selected for funding as identified in the notice of intended decision. (See Board Approved Preliminary Awards attached as Exhibit "A.")

This Notice is being filed within 72 hours (not including weekends) of the posting of the notice of intended decision on the Corporation's website on Friday, March 16, 2018 at 1:05 p.m. Hawthorne Park and Hawthorne Park Developer reserve the right to file a formal written protest within (10) days of the filing of this Notice pursuant to section 120.57(3), Florida Statutes. This Notice is being filed to, among other matters, preserve Hawthorne Park and Hawthorne Park Developer's ability to initiate or intervene in proceedings that may impact that scoring, ranking and funding determination.

Please acknowledge receipt of this filing by stamping the date and time on the enclosed copy of this letter.

Sincerely,


Michael G. Maida

MGM/sem
Attachment

Exhibit B

RFA 2017-113 Board Approved Preliminary Awards

Total HC Available for RFA	14,601,863.00
Total HC Allocated	13,898,000.00
Total HC Remaining	703,863.00

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	HC Funding Amount	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Funding Preference	Leveraging Classification	Florida Job Creation Preference	Lottery Number
Broward County Application													
2018-284C	Sailboat Bend Apartments II	Broward	Kenneth Naylor	APC Sailboat Bend II Development, LLC; HEF-Dixie Court Development, LLC	2,561,000.00	Y	20	Y	Y	Y	A	Y	5
Duval County Application													
2018-293C	Lofts at Jefferson Station	Duval	James R. Hoover	TVC Development, Inc.	1,660,000.00	N	20	Y	Y	Y	A	Y	32
Hillsborough County Application													
2018-283C	The Boulevard at West River	Hillsborough	Jerome D Ryans	WRDGT3A Developer, LLC	2,110,000.00	N	20	Y	Y	Y	A	Y	15
Orange County Application													
2018-274C	Pendana at West Lakes Senior Residences	Orange	Eddy Moratin	New Affordable Housing Partners, LLC; LIFT Orlando Community Development, LLC	2,110,000.00	Y	20	Y	Y	Y	A	Y	22
Palm Beach County Application													
2018-286C	Ocean Breeze East	Palm Beach	Lewis V Swezy	RS Development Corp; Lewis Swezy	2,070,000.00	N	20	Y	Y	Y	A	Y	8
Pinellas County Application													
2018-304C	Eagle Ridge	Pinellas	Richard Higgins	Norstar Development USA, LP; Tarpon Springs Development, LLC	1,660,000.00	N	20	Y	Y	Y	B	Y	16

EXHIBIT "A"

RFA 2017-113 Board Approved Preliminary Awards

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	HC Funding Amount	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Funding Preference	Leveraging Classification	Florida Job Creation Preference	Lottery Number
2018-279C	Marquis Apartments	Broward	Mara S. Mades	Cornerstone Group Partners, LLC	1,727,000.00	N	20	Y	Y	Y	A	Y	9

Non-Profit Application or 2nd Broward County Application

On March 16, 2018, 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 Applicants 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 2017-113 All Applications

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	Demo. Commitment	Total Units	HC Funding Amount	Eligible For Funding?	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Preference	Total Corp Funding Per Set-Aside	Leveraging Classification	Florida Job Creation Preference	Lottery Number
2018-272C	Venetian Isles	Pinellas	Joseph F. Chapman, IV	Royal American Properties, LLC	E, Non-ALF	86	1,660,000.00	Y	N	15	Y	Y	NC	117,358.14	A	Y	11
2018-273C	Hawthorne Park	Orange	Jonathan L. Wolf	Hawthorne Park Developer, LLC	E, Non-ALF	116	2,110,000.00	Y	Y	15	Y	Y	NC	117,505.17	A	Y	3
2018-274C	Pendana at West Lakes Senior Residences	Orange	Eddy Moratin	New Affordable Housing Partners, LLC; LIFT Orlando	E, Non-ALF	120	2,110,000.00	Y	Y	20	Y	Y	NC	130,960.67	A	Y	22
2018-275C	Berkeley Landing	Palm Beach	Jonathan L. Wolf	Berkeley Landing Developer, LLC	E, Non-ALF	120	2,110,000.00	Y	Y	15	Y	Y	NC	113,588.33	A	Y	6
2018-277C	Bristol Manor	Orange	Jonathan L. Wolf	Bristol Manor Developer, LLC	E, Non-ALF	98	2,110,000.00	Y	Y	15	Y	Y	NC	130,906.12	A	Y	13
2018-278C	Channel Side Apartments	Palm Beach	William T Fabbri	The Richman Group of Florida, Inc.; BDG Channel	F	108	2,100,000.00	Y	N	20	Y	Y	NC	125,611.11	A	Y	24
2018-279C	Marquis Apartments	Broward	Mara S. Mades	Cornerstone Group Partners, LLC	F	100	1,727,000.00	Y	N	20	Y	Y	NC	94,829.57	A	Y	9
2018-280C	Banyan Station	Palm Beach	Matthew A Rieger	HTG Banyan Developer, LLC	F	80	2,050,000.00	Y	N	20	Y	Y	NC	136,325.00	B	Y	17
2018-281C	Madison Landing	Orange	Patrick E Law	American Residential Communities, LLC	E, Non-ALF	88	2,110,000.00	Y	N	15	Y	Y	NC	127,559.09	A	Y	19
2018-282C	Madison Plaza	Orange	Patrick E Law	American Residential Communities, LLC	E, Non-ALF	88	2,110,000.00	Y	N	15	Y	Y	NC	127,559.09	A	Y	21
2018-283C	The Boulevard at West River	Hillsborough	Jerome D Ryans	WRDG T3A Developer, LLC	F	118	2,110,000.00	Y	N	20	Y	Y	NC	118,160.00	A	Y	15
2018-284C	Sailboat Bend Apartments II	Broward	Kenneth Naylor	APC Sailboat Bend II Development, LLC; HEF-Dixie	E, Non-ALF	110	2,561,000.00	Y	Y	20	Y	Y	NC	114,661.80	A	Y	5
2018-285C	Anderson Terrace Apartments	Orange	Matthew A Rieger	HTG Anderson Terrace Developer, LLC	F	120	1,625,000.00	Y	N	15	Y	Y	NC	126,072.92	A	Y	4
2018-286C	Ocean Breeze East	Palm Beach	Lewis V Swezy	RS Development Corp; Lewis Swezy	F	123	2,070,000.00	Y	N	20	Y	Y	NC	108,717.07	A	Y	8
2018-289C	Heron Estates Family	Palm Beach	Matthew A Rieger	HTG Heron Estates Family Developer, LLC	F	79	1,541,751.00	Y	N	20	Y	Y	NC	126,072.30	A	Y	10
2018-291C	Springfield Plaza	Duval	Clifton E. Phillips	Roundstone Development, LLC	F	84	1,660,000.00	Y	N	15	Y	Y	NC	127,661.90	A	Y	25
2018-293C	Lofts at Jefferson Station	Duval	James R. Hoover	TVC Development, Inc.	F	98	1,660,000.00	Y	N	20	Y	Y	NC	126,160.00	A	Y	32

Eligible Applications

RFA 2017-113 All Applications

Application Number	Name of Development	County	Name of Authorized Principal Representative	Name of Developers	Demo. Commitment	Total Units	HC Funding Amount	Eligible For Funding?	NP?	Total Points	Proximity Funding Preference	Per Unit Construction Funding Preference	Development Category Preference	Development Category	Total Corp Funding	Leveraging Classification	Florida Job Creation Preference	Lottery Number
2018-294C	Birch Hollow	Orange	Matthew A Rieger	HTG Birch Hollow Developer, LLC	E, Non-ALF	120	1,625,000.00	Y	N	15	Y	Y	Y	NC	126,072.92	A	Y	18
2018-296C	City Edge	Hillsborough	William T Fabbri	The Richman Group of Florida, Inc.; Corporation to	E, Non-ALF	120	2,110,000.00	Y	Y	20	Y	Y	Y	NC	130,960.67	A	Y	20
2018-297C	ETHANS WALK APARTMENTS	Orange	DEION R LOWERY	DRL EW DEVELOPMENT LLC	E, Non-ALF	88	1,576,344.00	Y	N	15	Y	Y	Y	NC	115,717.98	A	Y	7
2018-299C	Sandpiper Court	Pinellas	Domingo Sanchez	DDER Development, LLC	E, Non-ALF	64	1,660,000.00	Y	N	15	N	Y	Y	NC	137,987.50	B	Y	33
2018-300C	Casa Sant'Angelo Apartments	Broward	Kenneth Naylor	Casa Sant'Angelo Development, LLC	E, Non-ALF	113	2,383,228.00	Y	Y	15	Y	Y	Y	NC	115,808.01	A	Y	30
2018-302C	Parramore Oaks Phase Two	Orange	Paula McDonald Rhodes	InVictus Development, LLC; ADC Communities, LLC; Royal	F	89	1,603,777.00	Y	N	15	Y	Y	Y	NC	143,894.44	B	Y	14
2018-303C	Village View	Broward	Matthew A. Rieger	HTG Village View Developer, LLC	E, Non-ALF	96	2,561,000.00	Y	N	15	Y	Y	Y	NC	120,633.77	A	Y	1
2018-304C	Eagle Ridge	Pinellas	Richard Higgins	Norstar Development USA, LP; Tarpon Springs	F	71	1,660,000.00	Y	N	20	Y	Y	Y	NC	151,036.62	B	Y	16

Ineligible Applications

2018-276C	Durham Place	Orange	Jonathan L. Wolf	Durham Place Developer, LLC	E, Non-ALF	116	2,110,000.00	N	Y	15	N	Y	Y	NC	117,505.17		Y	23
2018-287C	Anchorage Apartments	Pinellas	William T Fabbri	The Richman Group of Florida, Inc.	E, Non-ALF	87	1,600,000.00	N	N	15	N	Y	Y	NC	136,974.71		Y	28
2018-288C	Douglas Gardens IV	Broward	Matthew A. Rieger	Douglas Gardens IV Developer, LLC	E, Non-ALF	120	2,561,000.00	N	N	20	Y	Y	Y	NC	117,187.09		Y	31
2018-290C	FOUR6 Skyway	Pinellas	Bowen A Arnold	DDA Development, LLC	E, Non-ALF	80	1,660,000.00	N	N	20	Y	Y	Y	NC	126,160.00		Y	2
2018-292C	Village of Valor	Palm Beach	Kathy S Makino-Leipsitz	KSM Holdings Florida, LLC	F	157	2,110,000.00	N	Y	15	Y	Y	Y	NC	104,050.38		Y	29
2018-295C	Heritage at Arbor Ridge	Orange	Robert G Hoskins	NuRock Development Partners, Inc.	E, Non-ALF	80	1,475,990.00	N	N	15	Y	Y	Y	NC	137,414.67		Y	12
2018-298C	Residences at Barnett Park	Orange	Robert G Hoskins	NuRock Development Partners, Inc.	F	97	1,819,892.00	N	N	15	Y	Y	Y	NC	139,737.69		Y	27
2018-301C	CHANDLERS CROSSING APARTMENTS	Orange	DEION R LOWERY	DRL CC DEVELOPMENT LLC	F	88	1,576,344.00	N	N	15	Y	Y	Y	NC	115,717.98		Y	26

Principal Disclosures for Applicant

APPROVED for HOUSING CREDIT APPLICATION
FHFC Advance Review 10.17.16

Select the organizational structure for the Applicant entity:

The Applicant is a: Limited Partnership

Provide the name of the Applicant Limited Partnership:

West Lakes Phase II, LP

First Principal Disclosure Level:

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

<u>First Level Entity #</u>	<u>Select Type of Principal of Applicant</u>	<u>Enter Name of First Level Principal</u>	<u>Select organizational structure of First Level Principal identified</u>
1.	General Partner	LIFT Orlando, Inc	Non-Profit Corporation
2.	Non-Investor LP	LIFT Orlando Phase II SLP, LLC	Limited Liability Company
3.	Non-Investor LP	West Lakes Phase II ALP, LLC	Limited Liability Company
4.	Investor LP	LIFT Orlando Phase II SLP, LLC	Limited Liability Company
5.	Investor LP	West Lakes Phase II ALP, LLC	Limited Liability Company

Second Principal Disclosure Level:

West Lakes Phase II, LP

[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

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

Select organizational structure of Second Level Principal identified

<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>
1. (LIFT Orlando, Inc)	1.A. Officer	Sittema, Thomas	Natural Person
1. (LIFT Orlando, Inc)	1.B. Officer	Hogan, Steve	Natural Person
1. (LIFT Orlando, Inc)	1.C. Officer	Saliba, Sy	Natural Person
1. (LIFT Orlando, Inc)	1.D. Executive Director	Moratin, Eddy	Natural Person
1. (LIFT Orlando, Inc)	1.E. Officer	Dymond, Jr., William T.	Natural Person
1. (LIFT Orlando, Inc)	1.F. Director	Sittema, Thomas	Natural Person
1. (LIFT Orlando, Inc)	1.G. Director	Hogan, Steve	Natural Person
1. (LIFT Orlando, Inc)	1.H. Director	Saliba, Sy	Natural Person
1. (LIFT Orlando, Inc)	1.I. Director	Schultz, Lisa	Natural Person
1. (LIFT Orlando, Inc)	1.J. Director	Dymond, Jr., William T.	Natural Person
1. (LIFT Orlando, Inc)	1.K. Director	Hostetter, Sandy	Natural Person
2. (LIFT Orlando Phase II SLP, LLC)	2.A. Manager	LIFT Orlando, Inc.	Non-Profit Corporation
2. (LIFT Orlando Phase II SLP, LLC)	2.B. Member	LIFT Orlando, Inc.	Non-Profit Corporation
3. (West Lakes Phase II ALP, LLC)	3.A. Manager	New Columbia Residential, LLC	Limited Liability Company
3. (West Lakes Phase II ALP, LLC)	3.B. Member	New Columbia Residential, LLC	Limited Liability Company

Third Principal Disclosure Level:

West Lakes Phase II, LP

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

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

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

Enter Name of Third Level Principal who must be a Natural Person

The organizational structure of Third Level Principal identified Must Be a Natural Person

<u>Second Level Entity #</u>	<u>Select the type of Principal being associated with the corresponding Second Level Principal Entity</u>	<u>Enter Name of Third Level Principal who must be a Natural Person</u>	<u>The organizational structure of Third Level Principal identified Must Be a Natural Person</u>
2.A. (LIFT Orlando, Inc.)	Officer	Sittema, Thomas	Natural Person
2.A. (LIFT Orlando, Inc.)	Officer	Hogan, Steve	Natural Person
2.A. (LIFT Orlando, Inc.)	Officer	Saliba, Sy	Natural Person
2.A. (LIFT Orlando, Inc.)	Executive Director	Moratin, Eddy	Natural Person
2.A. (LIFT Orlando, Inc.)	Officer	Dymond, Jr., William T.	Natural Person
2.A. (LIFT Orlando, Inc.)	Director	Sittema, Thomas	Natural Person
2.A. (LIFT Orlando, Inc.)	Director	Hogan, Steve	Natural Person
2.A. (LIFT Orlando, Inc.)	Director	Saliba, Sy	Natural Person
2.A. (LIFT Orlando, Inc.)	Director	Schultz, Lisa	Natural Person
2.A. (LIFT Orlando, Inc.)	Director	Dymond, Jr., William T.	Natural Person

Principal Disclosures for Applicant

APPROVED for HOUSING CREDIT APPLICATION
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2.A. (LIFT Orlando, Inc.)	Director	Hostetter, Sandy	Natural Person
2.B. (LIFT Orlando, Inc.)	Officer	Sittema, Thomas	Natural Person
2.B. (LIFT Orlando, Inc.)	Officer	Hogan, Steve	Natural Person
2.B. (LIFT Orlando, Inc.)	Officer	Saliba, Sy	Natural Person
2.B. (LIFT Orlando, Inc.)	Executive Director	Moratin, Eddy	Natural Person
2.B. (LIFT Orlando, Inc.)	Officer	Dymond, Jr., William T.	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Sittema, Thomas	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Hogan, Steve	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Saliba, Sy	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Schultz, Lisa	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Dymond, Jr., William T.	Natural Person
2.B. (LIFT Orlando, Inc.)	Director	Hostetter, Sandy	Natural Person
3.A. (New Columbia Residential, LLC)	Member	Grauley, James S.	Natural Person
3.A. (New Columbia Residential, LLC)	Member	Khalil, Noel F.	Natural Person
3.A. (New Columbia Residential, LLC)	Manager	Grauley, James S.	Natural Person
3.A. (New Columbia Residential, LLC)	Manager	Khalil, Noel F.	Natural Person
3.B. (New Columbia Residential, LLC)	Member	Grauley, James S.	Natural Person
3.B. (New Columbia Residential, LLC)	Member	Khalil, Noel F.	Natural Person
3.B. (New Columbia Residential, LLC)	Manager	Grauley, James S.	Natural Person
3.B. (New Columbia Residential, LLC)	Manager	Khalil, Noel F.	Natural Person

Principal Disclosures for the two Developers

APPROVED for HOUSING CREDIT APPLICATION
FHFC Advance Review 10.17.16

How many Developers are part of this Application structure? (Please complete the Principal Disclosures for each of the two Co-Developers below.)

2

Select the organizational structure for the first Co-Developer entity:

The first Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

New Affordable Housing Partners, LLC

First Principal Disclosure Level:

New Affordable Housing Partners, LLC

[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.	Manager	Grauley, James S.	Natural Person
2.	Manager	Khalil, Noel F.	Natural Person
3.	Member	Grauley, James S.	Natural Person
4.	Member	Khalil, Noel F.	Natural Person

Principal Disclosures for the two Developers

APPROVED for HOUSING CREDIT APPLICATION
FHFC Advance Review 10.17.16

Select the organizational structure for the second Co-Developer entity:

The second Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

LIFT Orlando Community Development, LLC

First Principal Disclosure Level:

LIFT Orlando Community Development, LLC

[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.	Member	LIFT Orlando, Inc	Non-Profit Corporation
2.	Manager	LIFT Orlando, Inc	Non-Profit Corporation

Second Principal Disclosure Level:

LIFT Orlando Community Development, LLC

[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

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

Select organizational structure of Second Level Principal identified

Second Level Entity #	Principal Entity	Enter Name of Second Level Principal	
1. (LIFT Orlando, Inc)	1.A. Officer	Sittema, Thomas	Natural Person
1. (LIFT Orlando, Inc)	1.B. Officer	Hogan, Steve	Natural Person
1. (LIFT Orlando, Inc)	1.C. Officer	Saliba, Sy	Natural Person
1. (LIFT Orlando, Inc)	1.D. Officer	Moratin, Eddy	Natural Person
1. (LIFT Orlando, Inc)	1.E. Officer	Dymond, Jr., William T.	Natural Person
1. (LIFT Orlando, Inc)	1.F. Director	Sittema, Thomas	Natural Person
1. (LIFT Orlando, Inc)	1.G. Director	Hogan, Steve	Natural Person
1. (LIFT Orlando, Inc)	1.H. Director	Saliba, Sy	Natural Person
1. (LIFT Orlando, Inc)	1.I. Director	Schultz, Lisa	Natural Person
1. (LIFT Orlando, Inc)	1.J. Director	Dymond, Jr., William T.	Natural Person
1. (LIFT Orlando, Inc)	1.K. Director	Hostetter, Sandy	Natural Person
2. (LIFT Orlando, Inc)	2.A. Officer	Sittema, Thomas	Natural Person
2. (LIFT Orlando, Inc)	2.B. Officer	Hogan, Steve	Natural Person
2. (LIFT Orlando, Inc)	2.C. Officer	Saliba, Sy	Natural Person
2. (LIFT Orlando, Inc)	2.D. Officer	Moratin, Eddy	Natural Person
2. (LIFT Orlando, Inc)	2.E. Officer	Dymond, Jr., William T.	Natural Person
2. (LIFT Orlando, Inc)	2.F. Director	Sittema, Thomas	Natural Person
2. (LIFT Orlando, Inc)	2.G. Director	Hogan, Steve	Natural Person
2. (LIFT Orlando, Inc)	2.H. Director	Saliba, Sy	Natural Person
2. (LIFT Orlando, Inc)	2.I. Director	Schultz, Lisa	Natural Person
2. (LIFT Orlando, Inc)	2.J. Director	Dymond, Jr., William T.	Natural Person
2. (LIFT Orlando, Inc)	2.K. Director	Hostetter, Sandy	Natural Person