**From:** Joe Chambers [mailto:jchambers@gardnercapital.com]

Sent: Thursday, August 24, 2017 10:01 AM

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**Subject:** Non-Profit Goal Question

Good Morning Gentlemen,

I'm confused by the new non-profit goal. I understand the Section 42 requirement and you certainly know better than I do with regard to how close you have been to meeting it recently.

That said, in the specific instance of the upcoming round, my understanding is that with the Brownsville case you are going to accept the DCA opinion and forward allocate from the Medium pool. As it happens, Brownsville is a non-profit so in reality the upcoming pool of credits will fund two non-profits first? My proposal would be that in this cycle you're already meeting the non-profit "need" so it's not necessary for this round. Going into future years, I'd propose that instead of an goal upfront, you change the funding order to first give a binding commitment at the end of the ranking IF no non-profit is funded through the more "natural" lottery process.

More generally, I would strongly discourage preferences based upon an organizations IRS tax-status and instead on the metrics of each development proposed. Just like "for-profit" tax status companies, some are better than others in terms of what they deliver and positive community impact and the same applies to "non-profits." Just look at the 990's.

Again, I'm not trying to create a debate here on for-profit vs non-profit (there are great groups on both sides) just that to prioritize one over another based solely on tax-status is arbitrary and goes against what I think the spirit of the program is trying to achieve.

Would love to discuss in more detail if you have any questions.

Thanks,