

**From:** Robert Fink <[rfink@wilhoitproperties.com](mailto:rfink@wilhoitproperties.com)>  
**Sent:** Friday, April 24, 2020 1:17 PM  
**To:** Marisa Button <[Marisa.Button@floridahousing.org](mailto:Marisa.Button@floridahousing.org)>  
**Subject:** RFA Comment - Financial Beneficiaries

Marisa,

Zimmerman wanted to include this comment in support of the concept to re-define Principals and/or Financial Beneficiaries. While it appears that Rule Development didn't include language to capture the proposed change below, we believe that individual RFAs should incorporate a stronger definition of Financial Beneficiary. In order to have an effective Tier One / Tier Two application structure, financial beneficiaries should be limited to the tiered caps and held accountable for attempts to circumvent those limits. We believe this change will strengthen the concept of a tiered application system and effectively further the goals of FHFC.

***Suggested RFA Language:***

**Priority Designation of Applications**

"FHFC may reject any Application in (current RFA 20xx-xxx), and all subsequent Applications within the following 24 month period, made by an Applicant who has been deemed to use a Related Party, through a Direct or Indirect Interest, with the intent to exceed the maximum number of Priority I Applications, as stated in (current RFA 20xx-xxx)."

***Suggested Definitions:***

"**Interest - Direct or Indirect**" refers to a person or entity having ownership, financial or controlling interest in another entity.

"**Related Party**" means a relative (including but not limited to grandfather, grandmother, father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister) of any Principal or any entity that shares common Principals, executive directors, board members, or officers.

Thanks and Stay Safe,

R. Fink



**Robert Fink | VP of Development – Southeast Region**

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*Please note our **Corporate Office** has changed address. Please update any records for correspondence regarding Corporate matters to the following:*

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