

From: Todd Wind <twind@timsheldevelopment.com>
Sent: Wednesday, March 4, 2020 3:48 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Oscar Sol <osol@greenmillsgroup.com>; Mitchell Rosenstein <mrosenstein@greenmillsgroup.com>; Tab Bullard <tbullard@wilhoitproperties.com>; Robert Fink <rfink@wilhoitproperties.com>; Brian Parent <bjparent@comcast.net>; Brian Waterfield <bwaterfield@timsheldevelopment.com>
Subject: Suggestions for Upcoming RFAs & Rule Chapter 67-48

Good Afternoon Marisa,

In an attempt to help close the loophole that was exploited in RFA 2019-112, Green Mills Group, Zimmerman Properties, JPM Development, and Timshel Development Group would like to submit the following language for your consideration:

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).”

In connection with the suggested language above, we would propose the following definitions for Rule Chapter 67-48:

Suggested Rule 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.

FYI...some of us are doing business up in Georgia as well, and have found that their definition above of Related Party has been very effective.

Sincerely,



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