

**STATE OF FLORIDA  
FLORIDA HOUSING FINANCE CORPORATION**

SP CENTRAL COURT 2012 LP,

Petitioner,

vs.

FLORIDA HOUSING FINANCE  
CORPORATION,

Respondent.

Application No.  
2011- 133C

FHFC File No.: 2012-038UC

RECEIVED  
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FLORIDA HOUSING  
FINANCE CORPORATION

\_\_\_\_\_ ,

**PETITION FOR INFORMAL HEARING**

Petitioner, SP Central Court 2012 LP ("SP"), pursuant to Rules 28-106.301 and 67-48.005, Florida Administrative Code, requests an informal administrative hearing to be conducted in accordance with Sections 120.569 and 120.57(2), Florida Statutes (2011), to contest the scoring decision with respect to CTA River Apartments, Application No. 2011-133C ("Applicant"), a competing application for funding in the 2011 Universal Cycle. The scoring issue being challenged is whether the Tie-Breaker Measurement Point ("TBMP") provided by Applicant met the requirements necessary to enable the Applicant to receive Proximity Tie-Breaker points. In support thereof, SP states:

Identification of Agency Affected

1. The name, address and telephone number of the agency affected is:

Florida Housing Finance Corporation, Inc. ("FHFC")  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301-1329  
(850) 488-4197

Identification of Petitioner and Petitioner's Representatives

2. The name, address and telephone number of SP is:

SP Central Court 2012 LP  
2430 Estancia Blvd., Suite 101  
Clearwater, FL 33761  
(727) 669-3660

3. The names, addresses and telephone numbers of SP's representatives, which shall be the addresses for service purposes during the course of these proceedings, are:

Lawrence E. Sellers, Jr.  
HOLLAND & KNIGHT, LLP  
315 South Calhoun Street, Suite 600  
Tallahassee, FL 32301  
(850) 425-5670

Andrea Becker  
HOLLAND & KNIGHT, LLP  
100 North Tampa Street, Suite 4100  
Tampa, FL 33602  
(813) 227-348

Background

4. FHFC is a public corporation, organized to provide and promote the public welfare by administering the governmental function of financing and refinancing housing and related facilities in the State of Florida.



5. The Low Income Housing Tax Credit ("Tax Credit") program is created within the Internal Revenue Code, and awards a dollar for dollar credit against federal income tax liability in exchange for the acquisition and substantial rehabilitation or new construction of rental housing units targeted at low and very low income population groups. Developers sell, or syndicate, the Tax Credits to generate a substantial portion of the funding necessary for construction of affordable housing development.

6. FHFC is the designated "housing credit agency" responsible for the allocation and distribution of Florida's Tax Credits to applicants for the development of rental housing for low income and very low income families.

7. FHFC uses a Qualified Allocation Plan ("QAP"), the Universal Application and a scoring process for the award of Tax Credits, as outlined in Rule 67-48.004, Florida Administrative Code. The provisions of the QAP are adopted and incorporated by reference in Rule 67-48.002(94), Florida Administrative Code. Pursuant to the QAP, Tax Credits are apportioned among the most populated counties, medium populated counties, and least populated counties. The QAP also establishes various set-asides and special targeting goals.

8. The 2011 Universal Cycle Application is adopted as Form UA1016 (Rev. 2-11) by Rule 67-48.004(1)(a), Florida Administrative Code, and consists of

Parts I through V and Instructions, some of which are not applicable to every applicant.

9. FHFC's scoring process for 2011, found at Rules 67-48.004-.005, Florida Administrative Code, involves the following:

- a) the publication and adoption by rule of an application package;
- b) the completion and submission of applications by developers;
- c) FHFC's preliminary scoring of applications;
- d) an initial round of challenges in which an applicant may take issue with FHFC's scoring of another application by filing a Notice of Possible Scoring Error ("NOPSE");
- e) FHFC's consideration of the NOPSEs submitted, with notice to applicants of any resulting change in their preliminary scores;
- f) an opportunity for the applicant to submit additional materials to FHFC to "cure" any items for which the applicant received less than the maximum score;
- g) a second round of challenges whereby an applicant may file a Notice of Alleged Deficiency ("NOAD");
- h) FHFC's consideration of the NOADs submitted, with notice to applicants of any resulting change in their scores;



- i) an opportunity for applicants to challenge, via informal or formal administrative proceedings, FHFC's evaluation of any item for which the applicant received less than the maximum score; and
- j) final scores, ranking, and allocation of funding to successful applicants, as well as those who successfully appeal through the adoption of final orders.

#### SP's Substantial Interests

10. On or about December 6, 2011, numerous applications were submitted to FHFC seeking tax credit funding. SP applied for competitive 9% low income housing tax credits in FHFC's 2011 funding cycle for development of its project, involving acquisition and preservation of 68 units of garden style apartments in Tampa, Florida. SP's application number is 2011-149C.

11. At its June 8, 2012 meeting, FHFC's Board adopted final scores and rankings. SP's application met all of FHFC's threshold application requirements, received the maximum application score of 79 total points, the maximum ability to proceed tie-breaker score of 6 points, 24.5 proximity points, and competed for tax credits in the Preservation Set-Aside.<sup>1</sup>

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<sup>1</sup> Except for applicants proposing projects targeting specific Goals FHFC seeks to meet (e.g., the Florida Keys, Transit-Oriented Developments), applicants generally compete against each other for funding within the two Set-Asides: Preservation and Non-Preservation.

12. SP would have received its requested tax credit funding but for FHFC's erroneous scoring of Application No. 2011-133C, which, like SP, proposed a project located in Hillsborough County.

13. Like SP, Applicant competed for tax credit funding in the Preservation Set-Aside. Pursuant to FHFC's ranking methodology, including application of the Set Aside Unit Limitation ("SAUL") for Hillsborough County, there were only enough tax credits available in the Preservation Set-Aside to fund the Applicant's application before meeting the SAUL for Hillsborough County.

14. As explained below, if FHFC had not erred in scoring Applicant's application, SP would have received its requested tax credit funding. SP's substantial interests are therefore materially and adversely affected by FHFC's improper actions, and SP has standing to challenge those actions in this proceeding. As a result of FHFC's Final Ranking, four applications located in Hillsborough County were eligible for funding within the Preservation Set-Aside. All four Hillsborough County Applications tied the first five tie-breakers imposed by FHFC for applications competing within the Preservation Set-Aside. The sixth tie-breaker, which ultimately determined the Final Ranking for Hillsborough County Preservation applications, is based on proximity to certain services. The Final Ranking resulted in Applicant's application being the highest ranked application competing for funds in Hillsborough County, and since Applicant's



application was for a development consisting of 197 units, the SAUL for Hillsborough County was met and no other applications in Hillsborough County were considered for funding. As SP's application only proposed 68 units, its application would have been funded had FHFC properly scored Applicant's application.

15. FHFC should have found that Applicant was ineligible for Proximity Tie-Breaker points because the TBMP that the Applicant provided was not within 100 feet of a residential building existing or to be constructed as part of the proposed development. Such finding would have resulted in Applicant failing to achieve Proximity Tie-Breaker points, resulting in Applicant being ranked below SP's application, and SP therefore falling within the funding range for tax credits.<sup>2</sup>

#### Chronology

16. On or about December 6, 2011, in its originally submitted application, Applicant submitted a Surveyor Certification Form with information regarding a TBMP and proximity to services.<sup>3</sup>

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<sup>2</sup> Final Rankings available at: <http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2011/ImportantAnnouncements/1040-Final%20Ranking%20Scoring/HC%20and%20HC%20HOME%20Final%20Ranking%206-8-2012.pdf>.

<sup>3</sup> The 2011 Universal Cycle Application offers a maximum score of 79 points. In the event of a tie between competing applications, the Application Instructions provide for a series of tie-breaking procedures to rank such applications for funding priority including the use of lottery numbers (randomly assigned during the application process) and the award of Proximity Tie-Breaker points (Application Instructions, III.A.10. at 28). To be eligible for Proximity Tie-Breaker points, Applicants are required to submit a Surveyor Certification Form providing information regarding a Tie-Breaker Measurement Point and proximity to services. Application Instructions, III.A.10.a. at 28-29.

17. On or about January 19, 2012, FHFC, in its preliminary scoring summary report, awarded Applicant Tie-Breaker points for proximity to certain services.

18. Thereafter, in response to FHFC's denial of certain Proximity Tie-Breaker points in its NOPSE score report, dated February 23, 2012, Applicant submitted a replacement Surveyor Certification Form in a cure, on or about February 29, 2012.<sup>4</sup>

19. In response, on or about March 6, 2012, SP filed several NOADs demonstrating that Applicant was ineligible for any Proximity Tie-Breaker points because the TBMP Applicant provided was not located within 100 feet of a residential building existing or to be constructed as part of the proposed development.

20. SP included in each NOAD a sworn affidavit from a licensed surveyor confirming that the TBMP is located in excess of 100 feet from a residential building.<sup>5</sup> In fact, the affidavit states that the TBMP is located over 150 feet from a residential building.

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<sup>4</sup> Rule 67-48.004 (6), Florida Administrative Code, provides that "[a] new form, page or exhibit provided to the Corporation during [the cure] period shall be considered a replacement of that form, page or exhibit if such form, page or exhibit was previously submitted in the Applicant's Application.

<sup>5</sup> NOAD available at: [https://apply.floridahousing.org/Attachments/2011/2011-133C\\_ND.pdf](https://apply.floridahousing.org/Attachments/2011/2011-133C_ND.pdf).



21. Nonetheless, in its final score report, dated March 27, 2012, FHFC awarded Applicant Tie-Breaker points for proximity to 8 different services. As a result, Applicant received 32.5 Proximity Tie-Breaker points.

Statement of Ultimate Facts

22. FHFC erred in awarding Applicant Tie-Breaker points for proximity to services.

23. The TBMP that the Applicant provided does not meet FHFC's requirements, as it is not located within 100 feet of a residential building existing or to be constructed as part of the proposed development.

24. As noted above, the sworn affidavit SP included in its NOAD confirms that the TBMP Applicant provided is over 150 feet from any existing residential building.<sup>6</sup> In addition, another sworn affidavit from a second surveyor further confirms that the TBMP Applicant provided is over 150 feet from any existing residential building. A copy of this affidavit from the second surveyor is attached as Exhibit A. As stated in Applicant's original application, the proposed project is a Preservation application in a single building, which consists of 100% rehabilitation units. Because the proposed project consists of no new-construction units, there are no residential buildings to be constructed as part of the proposed

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<sup>6</sup> NOAD available at: [https://apply.floridahousing.org/Attachments/2011/2011-133C\\_ND.pdf](https://apply.floridahousing.org/Attachments/2011/2011-133C_ND.pdf).

development. Accordingly, the TBMP is not located within 100 feet of a residential building to be constructed as part of the proposed development.

25. Part III(A)(10)(a) of the 2011 Universal Application Instructions provides:

In order for all Applications to be eligible for proximity tie-breaker points . . . the Applicant must submit a *properly completed* and executed Surveyor Certification for Competitive HC Applications form . . . *which includes the Tie-Breaker Measurement Point* and services information requested below:

(1) Tie-Breaker Measurement Point: To determine proximity, the Applicant must first identify a Tie-Breaker Measurement Point on the proposed Development site and provide the latitude and longitude coordinates determined in degrees, minutes and seconds, with the degrees and minutes stated as whole numbers and the seconds truncated after one decimal place . . . (emphasis supplied).

26. Rule 67-48.002 (114), Florida Administrative Code provides:

“Tie-Breaker Measurement Point” means, with respect to a Competitive Housing Credit Development, 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. (emphasis supplied).

27. Further, the instructions on the Surveyor Certification Form (required to be eligible for Proximity Tie-Breaker points) state:

Tie Breaker Measurement 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*. (emphasis supplied).



28. Rule 67-48.004 (2) provides that the:

[f]ailure to submit an Application completed in accordance with the Application instructions and these rules will result in the failure to meet threshold, rejection of the Application, a score less than the maximum available, or a combination of these results in accordance with the instructions in the Application and this rule chapter.

29. Because the TBMP that the Applicant provided does not comply with the requirements in Rule 67-48.002(114) and the instructions, the Applicant's Surveyor Certification form was not properly completed and therefore is not eligible for Proximity Tie-Breaker points pursuant to FHFC's rules.<sup>7</sup>

30. The final rankings are based on the incorrect scoring of Applicant's application. But for FHFC's error in awarding Applicant Proximity Tie-Breaker points, SP's development would have been funded in the 2011 Funding Cycle.

#### Receipt of Notice of Agency Decision

31. SP received formal notice from FHFC of the final rankings and scores in the form of a memorandum dated June 8, 2012.<sup>8</sup> The notice stated that petitions

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<sup>7</sup> The final scoring of FHFC Application No. 2011-135C ("Nova Oaks Housing, Limited Partnership") demonstrates that an applicant's Surveyor Certification Form will not be considered where the TBMP does not meet FHFC's requirements. While FHFC ultimately entered into a consent order with the applicant due to a factual determination, FHFC originally denied the applicant Proximity Tie-Breaker points in the final scoring of the application because the TBMP that the applicant provided did not comply with the applicable requirements (in this case, it was not on the Development Site).

<sup>8</sup> Memorandum from Kevin L. Tatreu re: Final Rankings and Notice of Rights, available at: [http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2011/ImportantAnnouncements/130-Final%20Scoring%20Materials/Final\\_Ranking\\_Scores\\_Cover\\_Memo\\_and\\_Notice\\_of\\_Rights.pdf](http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2011/ImportantAnnouncements/130-Final%20Scoring%20Materials/Final_Ranking_Scores_Cover_Memo_and_Notice_of_Rights.pdf). Final Rankings available at: <http://www.floridahousing.org/FH-ImageWebDocs/UniversalApps/2011/ImportantAnnouncements/1040-Final%20Ranking%20Scoring/HC%20and%20HC%20HOME%20Final%20Ranking%206-8-2012.pdf>.

must be received by 5:00 p.m. on July 2, 2012. Accordingly, this petition is timely filed.

Specific Rules that Require Reversal or Modification

32. The statutes and rules at issue in this proceeding include, but are not limited to, Chapter 67-48, including Rules 67-48.004 and 67-48.005, Florida Administrative Code. Specifically, FHFC's definition of TBMP in Rule 67-48.002 (114), Florida Administrative Code, was applied in error to Applicant, resulting in an erroneous determination that Applicant was entitled to Proximity Tie-Breaker points, and therefore was within the funding range.

No Material Facts Are in Dispute

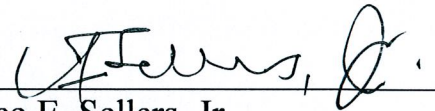
33. SP is currently unaware of any disputed issues of material fact. As noted above, SP asserts that the TBMP is not located within 100 feet of a residential building existing or to be constructed as part of the proposed development. Nothing in FHFC's scoring reports affirmatively determines that the TBMP is located within 100 feet of a residential building existing or to be constructed as part of the proposed development. If, however, FHFC disputes SP's assertion, SP reserves the right to request a formal hearing. Additionally, SP reserves the right to request a formal hearing if FHFC determines that there are any material facts in dispute.



Requested Relief

34. SP requests that it be granted an administrative hearing to contest FHFC's erroneous scoring and ranking decisions. SP requests the entry of recommended and final orders determining that the Applicant's application was improperly scored and ranked and that SP is entitled to an allocation of Housing Tax Credits from the 2011 Funding Cycle.

Respectfully submitted,



Lawrence E. Sellers, Jr.  
Florida Bar No. 300241  
HOLLAND & KNIGHT LLP  
315 South Calhoun Street, Suite 600  
Tallahassee, FL 32301  
(850) 425-5670  
larry.sellers@hklaw.com

Andrea Becker  
Florida Bar No. 0084017  
HOLLAND & KNIGHT LLP  
100 North Tampa Street, Suite 4100  
Tampa, FL 33602  
(813) 227-6348  
andrea.becker@hklaw.com

Attorneys for Petitioner  
*SP Central Court 2012 LP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing has been delivered by hand to Corporation Clerk, Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, FL 32301-1329; and that a true and correct copy has been provided by electronic mail to Wellington H. Meffert, General Counsel, 227 North Bronough Street, Suite 5000, Tallahassee, FL 32301-1329; all on this 2nd day of July, 2012.



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Lawrence E. Sellers, Jr.

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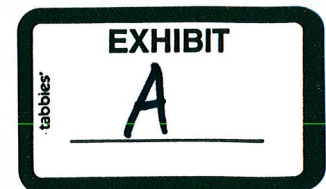


AFFIDAVIT


State of Florida  
County of Hillsborough

BEFORE ME, The undersigned authority personally appeared Richard C. Hinson, who is personally known and who being first duly sworn deposes and says:

1. My name is Richard C. Hinson and I am a professional surveyor and mapper in the State of Florida. Current Florida license number LS3840 bearing an expiration date of February 28, 2013.
2. I am not related to any party of the Applicant or Developer submitting the NOAD.
3. Attached hereto as Exhibit "A" is a 2011 Universal Cycle – Surveyor Certification for Competitive HC Applications prepared by C. Boyd Allen, PLS.
4. The certificate states that the Tie Breaker Measurement Point is located at Latitude North 27 Degrees 58 Minutes and 54.4 Seconds and Longitude West 82 Degrees 28 Minutes and 32.9 Seconds. Also known as the "TBMP".
5. Based upon a field location, I have established a point on the existing building at its closest proximity to the TBMP. The coordinate for the closest point on the existing building is Latitude North 27 Degrees 58 Minutes 56.0 Seconds and Longitude West 82 Degrees 28 Minutes 32.7 Seconds.
6. The measured distance from the TBMP to the closest point on the existing building is 162.97 feet. Therefore, the distance from the TBMP to the closest point on the existing building is greater than the allowed 100 feet.
7. Attached as Exhibit "B" and made a part of this affidavit is a sketch that illustrates the results of those field measurements.
8. Due to the truncation of the seconds to one decimal place on the latitude and longitude, the expected deviation in the distance on the ground would be approximately 10 feet (0.1 seconds of arc = 10+/- on the ground). Since the distance from the closest point on the existing building to the TBMP is 62.97 feet greater than the allowed 100 feet, the overage in the allowed distance is not due to truncation.



FURTHER AFFIANT SAYETH NAUGHT

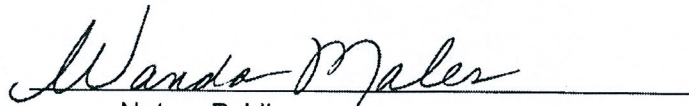


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Richard C. Hinson, PSM #LS3840

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

The foregoing instrument was acknowledged before me this 21st day of June, 2012, by Richard C. Hinson who is personally known to me and who did take an oath.



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Notary Public

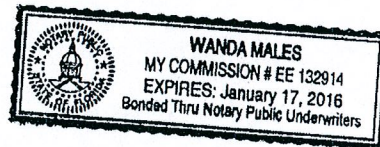




Exhibit A

2011 UNIVERSAL CYCLE - SURVEYOR CERTIFICATION FOR COMPETITIVE HC APPLICATIONS

Name of Development: CTA River Apartments  
(Part III A.1. of the 2011 Universal Cycle Application)

Development Location #: 4505 N. Rome Avenue, Tampa, FL 33603-2845  
(At a minimum, provide the address assigned by the United States Postal Service, including the address number, street name and city, or if the address has not yet been assigned, 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 Development consists of Scattered Sites, the Development Location stated above must reflect the Scattered Site where the Tie-Breaker Measurement Point is located.)

The undersigned Florida licensed surveyor confirms that the method used to determine the following latitude and longitude coordinates conforms to Rule 61G17-6, F.A.C.:

State the Tie-Breaker Measurement Point. <sup>1</sup>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>54.4</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>32.9</u> Seconds (truncated after 1 decimal place)
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If the Development consists of Scattered Sites, is a part of the boundary of each Scattered Site located within 1/2 mile of the Scattered Site with the most units?  
 Yes or  No (Must check one if Development consists of Scattered Sites.)<sup>2</sup>

To be eligible for proximity tie-breaker points, Degrees and Minutes must be stated as whole numbers and Seconds must be truncated after 1 decimal place. The Corporation will utilize Street Atlas USA 2010, published by DeLorme, to determine the proximity of an eligible service to the proposed Development's Tie-Breaker Measurement Point.

Transit Service - State the latitude and longitude coordinates for one (1) Transit Service on the chart below.<sup>3</sup>

Public Bus Stop	Latitude			Longitude		
	N Degrees	Minutes	Seconds (truncated after 1 decimal place)	W Degrees	Minutes	Seconds (truncated after 1 decimal place)
Public Bus Transfer Stop or Public Bus Rapid Transit Stop	N <u>27</u> Degrees	<u>58</u> Minutes	<u>52.4</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>44.7</u> Seconds (truncated after 1 decimal place)
Public Rail Station	N _____ Degrees	_____ Minutes	_____ Seconds (truncated after 1 decimal place)	W _____ Degrees	_____ Minutes	_____ Seconds (truncated after 1 decimal place)

Tier 1 and Tier 2 Services - State the Name, Address and latitude and longitude coordinates of the closest service(s) on the chart below.<sup>3</sup>

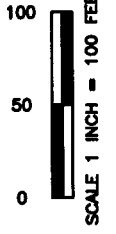
Tier 1 Services:	Latitude			Longitude		
	N Degrees	Minutes	Seconds (truncated after 1 decimal place)	W Degrees	Minutes	Seconds (truncated after 1 decimal place)
Grocery Store: Name - <u>Sweetbay Supermarket</u> Address - <u>4036 N Armenia Tampa FL 33607</u>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>32.3</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>29</u> Minutes	<u>08.8</u> Seconds (truncated after 1 decimal place)
Public School: Name - _____ Address - _____	N _____ Degrees	_____ Minutes	_____ Seconds (truncated after 1 decimal place)	W _____ Degrees	_____ Minutes	_____ Seconds (truncated after 1 decimal place)
Medical Facility: Name - <u>The Center for Internal Medicine</u> Address <u>701 W DrMLK Blvd #6 Tampa, FL 33603</u>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>54.8</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>04.2</u> Seconds (truncated after 1 decimal place)
Senior Center: Name - <u>Riverside Senior Center</u> Address - <u>829 W DrMLK Blvd Tampa FL 33603</u>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>54.7</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>16.3</u> Seconds (truncated after 1 decimal place)
Tier 2 Services:	Latitude			Longitude		
Public Park: Name - <u>Rivercrest Park</u> Address - <u>4802 N River Blvd Tampa FL 33603</u>	N <u>27</u> Degrees	<u>59</u> Minutes	<u>05.4</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>18.0</u> Seconds (truncated after 1 decimal place)
Community Center: Name - <u>Taylor Arts Studio</u> Address - <u>611 W Indiana Ave Tampa FL 33603</u>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>41.2</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>27</u> Minutes	<u>59.2</u> Seconds (truncated after 1 decimal place)
Pharmacy: Name - <u>Hillsborough River Pharmacy</u> Address - <u>1706 W DrMLK Blvd Tampa FL 33607</u>	N <u>27</u> Degrees	<u>58</u> Minutes	<u>51.9</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>28</u> Minutes	<u>39.5</u> Seconds (truncated after 1 decimal place)
Public Library: Name - <u>Seminole Heights Library</u> Address <u>4711 N Central Ave Tampa FL 33603</u>	N <u>27</u> Degrees	<u>59</u> Minutes	<u>18.5</u> Seconds (truncated after 1 decimal place)	W <u>82</u> Degrees	<u>27</u> Minutes	<u>18.0</u> Seconds (truncated after 1 decimal place)

If the Corporation discovers that there are any false statements made in this certification, the Corporation will forward a copy to the State of Florida Department of Business and Professional Regulation for investigation.

CERTIFICATION - Under penalties of perjury, I declare that the foregoing statement is true and correct.

Signature: [Signature] C. Boyd Allen, FLS  
 Print or Type Name and Title of Signatory: C. Boyd Allen, FLS  
 Florida License Number: 3932  
 American Surveying, Inc. 4847 N Florida Ave, Tampa, FL 33603  
 Name of Surveyor: American Surveying, Inc. Address (street address, city, state): 4847 N Florida Ave, Tampa, FL 33603  
 Telephone Number (including area code): 813-234-0103

UA1016 (Rev. 2-11) 67-48.004(1)(a); 67-21.003(1)(a), F.A.C. Provide Behind a Tab Labeled "Exhibit 25"  
 This certification, consists of 2 pages. This certification may not be signed by the Applicant, by any related parties of the Applicant, or by any Principals or Financial Beneficiaries of the Applicant. If the certification is inappropriately signed, the Application will not be eligible to receive proximity tie-breaker points. If this certification contains corrections or 'white-out', or if it is scanned, imaged, altered, or retyped, the Application will not be eligible to receive proximity tie-breaker points. The Application may still be eligible for automatic points. The certification may be photocopied. To be considered for scoring purposes, at least page 1 of this 2 page certification form must be provided by the Applicant.



16 STORY  
BUILDING

1 STORY  
BUILDING

CLOSEST POINT  
ON EXISTING  
BUILDING  
LAT:27°58'56.0"  
LON:82°28'32.7"

S 06°10'41" W  
162.97'

TIE BREAKER  
MEASUREMENT POINT  
LAT:27°58'54.4"  
LON:82°28'32.9"

DR. MARTIN LUTHER KING, JR. BOULEVARD

© 2012 Google



**HAMILTON**  
ENGINEERING & SURVEYING, INC.

311 NORTH NEWPORT AVENUE, SUITE 100 TEL (813) 250-3535  
TAMPA, FL 33606 LB#7013 FAX (813) 250-3636

EXHIBIT B  
CTA RIVER APARTMENTS

SEC TWP RGE 2-29-18	JOB NUMBER 02945.0001	SCALE AS SHOWN	DATE 2-29-18	SHEET 1/1
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