BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION

PARC GROVE, LLC
Petitioner,

vs.

FLORIDA HOUSING
FINANCE CORPORATION.
Respondent.

FORMAL WRITTEN PROTEST AND PETITION
FOR ADMINISTRATIVE HEARING

Petitioner, Parc Grove, LLC, (“Petitioner” or “Parc Grove”), pursuant to sections 120.57(1) and (3), Florida Statutes (“F.S.”) and Rules 28-110 and 67-60, Florida Administrative Code (“FAC”) hereby files this Formal Written Protest and Petition for Administrative Hearing (the “Petition”) regarding the scoring decisions of the Respondent, Florida Housing Finance Corporation (“Florida Housing”) to award funding to responsive Applicants pursuant to RFA 2019-112 Housing Credit Financing For Affordable Housing Developments Located in Miami-Dade County. (hereinafter the “RFA”)

Introduction

1. This Petition is filed pursuant to sections 120.57(1) and (3), Florida Statutes, Rules 28-110 and 67-60, Florida Administrative Code.

Parties

2. Petitioner is a Florida limited liability company in the business of providing affordable housing. Petitioner’s address is 3225 Aviation Avenue, 6th Floor, Coconut Grove, Florida 33133.
Petitioner’s address, telephone number and email address are those of its undersigned counsel for purposes of this proceeding.

3. The affected agency is Florida Housing Finance Corporation. Florida Housing’s address is 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329.

Notice

4. On August 20, 2019 Florida Housing issued the RFA.

5. On September 19, 2019 the RFA was modified by Florida Housing and a Notice of Modification of RFA 2019-112 was issued.¹

6. Applications in response to the RFA were due on or before October 22, 2019.

7. Florida Housing received sixty-three (63) applications in response to the RFA. Petitioner, in response to the RFA, requested an allocation of $2,875,950.00 in Housing Tax Credit funding for its proposed 110-unit affordable housing development in Miami-Dade County, Florida.

8. Petitioner received notice of the preliminary RFA scoring and rankings through electronic posting on Friday, January 24, 2020 at 9:03 am. A copy of the notices posted on the Corporations website are attached hereto as Exhibit “A”. Petitioner was deemed eligible for funding.

9. On Wednesday, January 29, 2020 at 8:00 am., Petitioner timely submitted their Notice of Intent to Protest Florida Housing’s intended decision. A copy of that Notice of Intent is attached hereto as Exhibit “B”.

10. This Petition is timely filed in accordance with the provisions of section 120.57(3) (b), Florida Statutes, and rules 28-110.004 and 67-60.009, Fla. Admin. Code.

¹ The Notice of Modification of Request For Applications (RFA) 2019-112 was posted on the Corporations website and sent via electronic mail to persons registered on the Corporation’s Multifamily Programs Registry.
Background

11. Florida Housing is a public corporation created by section 420.504, Florida Statutes, to administer the governmental function of financing or refinancing affordable housing and related facilities in Florida. Florida Housing’s statutory authority and mandates are set forth in Part V of Chapter 420, Florida Statutes. See, Sections 420.501-420.55, Fla. Stat. Florida Housing is designated as the Housing Credit agency for the State of Florida within the meaning of 42(h)(7)(A) of the IRC, and Chapters 67-48 and 67-60, Fla. Admin. Code.

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

RFA 2019-112

13. This RFA was specifically targeted to provide much needed affordable housing in Miami-Dade County, Florida. The RFA introduction provides as follows,

This Request for Applications (RFA) is open to Applicants proposing the development of affordable, multifamily housing located in Miami-Dade County.

Under this RFA, Florida Housing Finance Corporation (the Corporation) expects to have up to an estimated $7,195,917 of Housing Credits available for award to proposed Developments located in Miami-Dade County. ...

(RFA at 2)

14. This RFA also added a new provision which provides as follows in relevant part,

Priority Designation of Applications

Applicants may submit no more than three (3) Priority I Applications. There is no limit to the number of Priority II Applications that can be submitted; however, no
Principal\textsuperscript{2} can be a Principal of more than three (3) Priority I Applications.\textsuperscript{3}

Florida Housing will rely on the Principals of the Applicant and Developer(s) Disclosure Form (Rev. 05-2019) outlined below in order to determine if a Principal is a Principal on more than three (3) Priority I Applications. If during scoring it is determined that a Principal is disclosed as a Principal on more than three (3) Priority I Applications, all such Priority I Applications will be deemed Priority II.

If it is later determined that a Principal was not disclosed as a Principal and the undisclosed Principal causes the maximum set forth above to be exceeded, the award(s) for the affected Application(s) will be rescinded and all Principals of the affected Applications may be subject to material misrepresentation, even if the Applications were not selected for funding, were deemed ineligible, or were withdrawn.

(RFA at 6-7) (herein referred to as the “Priority I Requirement”)  

15. Appointed Review Committee members independently evaluate and score their assigned portions of the submitted applications based on various mandatory and scored items. (RFA at 69) The maximum point total that an applicant can receive is 15 points. (RFA at 67) Failure to meet all eligibility items results in an application being deemed ineligible. (RFA at 64).

16. The RFA provides that all eligible Priority I Applications will be ranked by sorting the Applications as follows, followed by Priority II Applications.

\textsuperscript{2} The word “Principal” means:

(a) For a corporation, each officer, director, executive director, and shareholder of the corporation.
(b) For a limited partnership, each general partner and each limited partner of the limited partnership.
(c) For a limited liability company, each manager and each member of the limited liability company.
(d) For a trust, each trustee of the trust and all beneficiaries of majority age (i.e.; 18 years of age) as of Application deadline.
(e) For a Public Housing Authority, each officer, director, commissioner, and executive director of the Authority. Rule 67-48.002(94), FAC.

\textsuperscript{3} The word “Applicant” means any person or legal entity of the type and with the management and ownership structure described herein that is seeking a loan or funding from the Corporation by submitting an Application or responding to a competitive solicitation pursuant to rule chapter 67-60, F.A.C., for one or more of the Corporation’s programs. For purposes of rules 67-48.0105 (Sale, Transfer or Refinancing of a SAIL Development), Rule 67-48.0205 (Sale, Transfer or Refinancing of a HOME Development) and 67-48.031 (Qualified Contractors), F.A.C., Applicant also includes any assigns or successors in interest of the Applicant. Unless otherwise stated in a competitive solicitation, as used herein, a ‘legal entity’ means a legally formed corporation, limited partnership or limited liability company. Rule 67-48.002(9), FAC.
a. First, from highest score to lowest score;

b. Next, by the Application’s eligibility for the Proximity Funding Preference (which is outlined in Section Four A.5.e of the RFA) with Applications that qualify for the preference listed above Applications that do not qualify for the preference;

c. Next, by the Application’s eligibility for the Per Unit Construction Funding Preference which is outlined in Section Four A.10.e of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);

d. Next, by the Application’s eligibility for the Development Category Funding Preference which is outlined in Section Four A.4. (b)(4) of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);

e. Next, by the Application’s Leveraging Classification, applying the multipliers outlined in item 3 of Exhibit C of the RFA (with Applications having the Classification of A listed above Applications having the Classification of B);

f. Next, by the Application’s eligibility for the Florida Job creation Funding Preference which is outlined in item 4 of Exhibit C of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference); and

g. And finally, by lottery number, resulting in the lowest lottery number receiving preference.

(RFA at 67-68)

17. The RFA mandates the Funding Selection Process (hereinafter “Selection Process”), as follows,

(a) The first Application selected for funding will be the highest ranking eligible Priority I Family Application that qualifies for the Geographic Areas of Opportunity / SADDA Goal if there are none, then the first Application selected for funding will be the highest ranking eligible Priority II Family Application that qualifies for the Geographic Areas of Opportunity/ SADDA Goal.

(b) The next Application selected for funding will be the highest-ranking eligible Priority I Application that qualifies as an Elderly (Non-ALF) Development. If there are none, then the next Application selected for funding will be the highest-ranking eligible Priority II Application that qualifies as an Elderly (Non-ALF) Development.

(c) The next Application(s) selected for funding will be the highest-ranking unfunded Priority I Application(s), regardless of Demographic Category until no more than three (3) total Applications are selected for funding. If less than three Applications are selected for funding and there are no eligible unfunded Priority I Applications, then the next Application(s), selected for funding will be the highest ranking unfunded
Priority II Application(s), regardless of Demographic Category until no more than three (3) total Applications are selected for funding. If the third Application cannot be fully funded, it will be entitled to receive a Binding Commitment for the unfunded balance.

(d) If funding remains after selecting the three (3) highest ranking eligible unfunded Applications as outlined above, or if funding remains because there are not three (3) eligible Applications that can be funded as outlined above, then no further Applications will be considered for funding and any remaining funding will be distributed as approved by the Board.

(RFA at 68)

18. On January 9, 2020, members of the Review Committee met at a public meeting to announce their scores. Just prior to the commencement of the ranking of eligible applications and selection for funding by the Review Committee, Marisa Button, Executive Director of Multi-Family Programs at Florida Housing and not a Review Committee member, addressed those present, with what she described as a comment for the public record. She proceeded to read the Priority I requirements from the RFA into the record. She then stated that certain applications, including Orchid District, LTD (Application 2020-148C), Parc Grove, LLC (Application 2020-105C) and others, which had all been deemed eligible by the Review Committee, shared “certain commonalities” which she described in detail. Ultimately however, Ms. Button noted, that Florida Housing could not determine that any of the applications shared a common “principal” as that term is defined in rule 67-48.002,FAC. Ms. Button concluded her statement by indicating that if any of the applications were later found to have violated the Priority I requirement they could be subject to the penalties in the RFA. Once Ms. Button concluded her statement the ranking and selection process commenced.

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4 Ms. Button is identified as a resource to the Review Committee Members but is not a scorer of applications.
5 Since the applications referenced by Ms. Button were all eligible for funding and the Review Committee was in the middle of scoring all eligible applications her statements at that time were highly unusual. The Petitioner denies any such allegation and further asserts that it complied with the RFA and its terms as defined in Florida Housing’s rules.
19. The following eligible applications were selected for funding by the Review Committee members on January 9, 2020,

- 2020-101C- Harbour Springs LLC (selected as meeting GAO/HUD SADDA Goal)
- 2020-148C- Orchid District, LTD (selected as meeting Elderly/Non-ALF Goal)
- 2020-117C- Naranja Lakes Housing Partners, LP (next highest-ranking unfunded Cat 1)

Three applications, including Application 2020-122C, Slate Miami Apartments, Ltd. ("Slate Miami") were deemed ineligible as a result of an alleged financial arrearage. At the conclusion of the Review Committee meeting the members of the Committee voted to forward the scores and their recommendations for funding to the Florida Housing Board for approval at the next regularly scheduled public board meeting.

20. However, on Thursday, January 16, 2020, Florida Housing issued a notice that the Review Committee would be reconvened for a meeting on Tuesday, January 21, 2020.

21. At the Reconvened Review Committee, Florida Housing Staff announced that a mistake had been made regarding the determination of financial arrearage and that the three applications, should have been considered eligible for funding. As a result, Application 2020-122C, Slate

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6 The Financial Arrearage Requirement within the RFA provides in part, "An Applicant will be deemed ineligible for funding if, as of the close of business the day before the Committee meets to make a recommendation to the Board there remains any financial obligations for which an Applicant or Developer or Principal, Affiliate or Financial Beneficiary of the Applicant or Developer is in arrears to the Corporation...." (RFA at 65). The word "Affiliate" means and person that:

(a) Directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under control with the Applicant or Developer;
(b) Serves as an officer or director of the Applicant or Developer or of any Affiliate of the Applicant or the Developer;
(c) Directly or indirectly receives or will receive a financial benefit from a Development except as further described in rule 67-48.0075, F.A.C., or
(d) Is the spouse, parent, child, sibling, or relative by marriage of a person described in paragraph (a), (b) or (c), above.

Rule 67-48.002(5), F.A.C. The word, "Financial Beneficiary" means any Principal of the Developer or Applicant entity who receives or will receive any direct or indirect financial benefit from a Development except as further described in rule 67-48.0075, F.A.C.
Miami, was deemed eligible and the Funding Selection Process was conducted again after the original scores were confirmed. As a result, the only change to the determinations made by the Review Committee on January 9 was Slate Miami, a Priority I Application, serving an Elderly Non-ALF demographic with a lottery number of 4 was selected ahead of Orchid District, LTD, a Priority I Application, serving an Elderly Non-ALF demographic with a lottery number of 6.

22. Applicant Parc Grove, LLC, Application No. 2020-105C (lottery number 3) was deemed eligible but unfunded. The scoring committee erroneously found Harbour Springs LLC ("Harbour Springs") (lottery number 1) eligible for funding, had Harbour Springs been deemed properly ineligible then Parc Grove would have been eligible for funding.

**Harbour Springs**

**Public School**

23. The RFA provides that an Applicant may earn proximity points based on the "... distance between the Development Location Point\(^7\) and the Bus or Rail Transit Service.... Community Services..." (RFA at 19) Eligible Community Services include Grocery Store, Public Store, Medical Facility and Pharmacy. (RFA at 22-23) The Required Minimum Total of proximity points that must be achieved to be eligible for funding is 10.5 points. The Total Proximity Points that must be achieved to receive the Proximity Funding Preference is 12.5 points or more. (RFA at 20)

24. The RFA provides, that Applicants may provide the location information and distances for three of the four Community Services on which to base the Application’s Community Services

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\(^7\) Development Location 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. 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. Rule 67-48.002(34), Florida Administrative Code.
Score. RFA at 22. Harbour Springs selected Public School, Medical Facility and Grocery Store as its three (3) Community services (RFA at 6)

25. Public School is defined within the RFA as follows,

A public elementary, middle, junior and/or high school, where the principal admission criterion is the geographic proximity to the school. This may include a charter school, if the charter school is open to appropriately aged children in the radius area who apply, without additional requirements for admissions such as passing an entrance exam or audition, payment of fees or tuition, or demographic diversity considerations.

Additionally, it must have been in existence and available for use by the general public as of the Application Deadline.

RFA at 87. (Emphasis Supplied)

26. Harbour Springs selected William A. Chapman Elementary ("Chapman School"), located at 27190 SW 140 Ave, Miami-Dade (sic), Florida 33032 as its Public School. Harbour Spring's application suggests that Chapman School is .37 miles from the Development Location Point. Had this information been correct, Harbour Springs would have been entitled to 4.0 proximity points for this claimed Community Service. (RFA at 98) However, the claimed Public School does not qualify for any proximity points.

27. The School Board of Miami-Dade County has designated the Chapman School as a magnet school. The Program that the Chapman School provides to elementary aged students is called STEAM which stands for Science, Technology, Engineering, Art and Math. Contrary to RFA requirements, the principal admission criterion to the Chapman School is not geographic proximity to the school, in fact the Miami-Dade Magnet School Catalog specifically provides that, "Magnet programs/schools do not adhere to boundary restrictions"
28. Eligibility requirements include a minimum Grade Point Average in core academic subject areas and in conduct, no more than ten (10) unexcused absences for the previous school year and a recommendation from a previous math or science program.

29. Considering the foregoing, the Chapman school does not qualify as a Public School and Harbour Springs is not entitled to the 4.0 proximity points claimed in its application for a Public School. As a result of this reduction, Harbour Springs’s proximity points total would be reduced from 17 to 13 points.

Medical Facility

30. Medical Facility is defined within the RFA as follows,

A medically licensed facility that (i) employs or has under contractual obligation at least one physician licensed under Chapter 458 or 459, F.S. available to treat patients by walk-in or by appointment; and (ii) provides general medical treatment to any physically sick or injured person. Facilities that specialize in treating specific classes of medical conditions or specific classes of medical conditions or specific classes of patients, including emergency rooms affiliated with specialty or Class II hospitals and clinics affiliated with specialty or Class II hospitals, will not be accepted.

Additionally, it must have been in existence and available for use by the general public as of the Application Deadline.

(RFA at p. 85) (emphasis added)

31. Harbour Springs selected Naranja Health Center ("NHC") located at 13805 SW 264 St., Miami-Dade, Fl 33032 as its Medical Facility. Harbour Spring’s application suggests that the claimed NHC facility is 0.35 miles away from the Development Location Point. Had this information been correct, Harbour Springs would have been entitled to 3.5 Proximity Points for this claimed Community Service.
32. Although a licensed physician may be employed or contractually obligated by the parent company under which the NHC facilities operate, the licensed physician is not physically located at this address and therefore is not available to treat patients by walk-in or by appointment.

33. Considering the foregoing, NHC does not qualify as a Medical Facility and Harbour Springs is not entitled to the 3.5 points claimed in its Application. As a result of this reduction, and in addition to the reduction for its Public-School selection, Harbour Springs has 9.5 total proximity points and is ineligible for funding.

**Substantial Interests Affected**

34. If Harbour Springs had been deemed ineligible for the foregoing reasons, Parc Grove would have been selected as the next eligible applicant.

35. Petitioner is substantially affected by the evaluation and scoring of the responses to the RFA. The results of the scoring have affected Petitioners ability to obtain funding through the RFA. Consequently, Petitioners have standing to initiate and participate in this and related proceedings.

36. Petitioner is entitled to a Formal Administrative Hearing pursuant to Sections 120.57(1) and 120.57(3), Florida statutes, to resolve the issues set forth in this Petition.

**Disputed Issues of Material Fact and Law**

37. Disputed issues of material fact and law exist and entitle Petitioners to a Formal Administrative Hearing pursuant to Section 120.57(1), Florida Statutes. The disputed issues of material fact and law include, but are not limited to, the following:

a. Whether the RFA’s criteria for determining eligibility were properly followed;

b. Whether the proposed awards are based on a correct determination of eligibility of the applicants;

c. Whether the Chapman School is a Public School as defined in the RFA;
d. Whether the principal admission criterion for the Chapman School is the geographic proximity to the school;

e. Whether the Naranja Health Center is a Medical Facility as defined in the RFA;

f. Whether Harbour Springs has achieved the Required Minimum Total of proximity points;

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

**Statutes and Rules Entitling Relief**

38. Petitioner is entitled to relief pursuant to Section 120.569 and 120.57, Florida Statutes, Chapters 28-106, 28-110, and 67-60, Florida Administrative Code.

**Concise Statement of Ultimate Fact and Law, Including the Specific Facts Warranting Reversal of the Agency’s Intended Award**

39. Petitioner participated in the RFA process to compete for an award of Housing Credit funds based upon the delineated scoring and ranking criteria in the RFA. Harbour Springs should be deemed ineligible for failing to meet the Required Minimum Total of proximity points and thus being ineligible for funding.

40. Unless the scoring and eligibility determination is corrected, and the preliminary allocation revised, Petitioner will be excluded from funding contrary to the provisions of the RFA and Florida Housing’s governing statutes and rules.

41. A correct application of the eligibility, scoring and ranking criteria will result in funding for the Petitioner.

**Right to Amend the Petition**

42. Petitioner reserves the right to amend this Petition if additional disputed issues of material fact are identified during the discovery process in this case.
WHEREFORE, pursuant to section 120.57(3), Florida Statutes, and rule 28-110.004, Florida Administrative Code, Petitioner’s request the following relief:

a) An opportunity to resolve this protest by mutual agreement within seven days of the filing of this Petition as provided by Section 120.57(3)(d)(1), Florida Statutes.

b) If this protest cannot be resolved within seven days, that the matter be referred to the Division of Administrative Hearings for a formal hearing to be conducted before an Administrative Law Judge (“ALJ”) pursuant to Section 120.57(1) and (3), Florida Statutes.

c) The ALJ enter a Recommended Order determining that the application of Harbour Springs is ineligible and award funding to the Petitioner as the next eligible applicant.

d) That the Corporation adopt the Recommended Order of the ALJ.

FILED AND SERVED this 10th day of February 2020.

Respectfully Submitted

[Signature]

Maureen M. Daughton, Esq.
FBN 0655805
Maureen McCarthy Daughton, LLC
1400 Village Square Blvd.
Ste 3-231
Tallahassee, Florida 32312

Counsel for Parc Grove, LLC
CERTIFICATE OF SERVICE

I CERTIFY that the original of this Formal Written Protest and Petition for Administrative Hearing was filed by electronic mail with the Corporation Clerk and Hugh Brown, General Counsel, Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301, on this 10th day of February, 2020.

Maureen M. Daughton
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Via Email  
January 29, 2020

Ms. Ana McGlamory, CP, FCP, FRP(A.McGlamory@floridahousing.org)  
Corporation Clerk  
Florida Housing Finance Corporation  
227 North Bronough, Suite 5000  
Tallahassee, Florida 32301

RE: Notice of Intent to Protest, Request for Applications (RFA) 2019-112 Proposed Funding Selections

Dear Corporation Clerk:

On behalf of Applicant, Parc Grove, LLC, Application No.2020-105C, we hereby give notice of our intent to protest the Preliminary Award Notice and Scoring and Ranking of RFA 2019-112 posted by Florida Housing Finance Corporation on January 24, 2020 at 9:03 a.m., concerning Housing Credit Financing for Affordable Housing Developments Located in Miami-Dade County (See Attached).

A formal written petition will be submitted within ten (10) days of this Notice as required by law.

Respectfully Submitted,

[Signature]

cc: Hugh Brown, General Counsel

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