

BEFORE THE FLORIDA HOUSING FINANCE CORPORATION

FLORIDA HOUSING
FINANCE CORPORATION

EGRET ON UNION, LTD.,

Petitioner,

FHFC Case No.: 2026-059BP

vs.

RFA No.: 2026-202

Application No.: 2027-022C

FLORIDA HOUSING FINANCE CORPORATION,

Respondent.

**FORMAL WRITTEN PROTEST
AND PETITION FOR ADMINISTRATIVE HEARING**

Petitioner, Egret on Union, Ltd. (“Egret on Union” or “Petitioner”), files this Formal Written Protest and Petition for Administrative Hearing (“Petition”) pursuant to section 120.57(3), Florida Statutes, and rules 67-60.009 and 28-110.004, Florida Administrative Code. This petition challenges the eligibility determinations, evaluations, and proposed allocations set forth in the Notice of Intended Decision posted on September 25, 2026, by Respondent, Florida Housing Finance Corporation (“Florida Housing” or “Respondent”), in response to Request for Applications 2026-202 Housing Credit Financing for Affordable Housing Developments Located in Broward, Duval, Hillsborough, Lee, Orange, Palm Beach, Pinellas, and Polk Counties (the “RFA”). In support, Egret on Union states:

I. Parties

1. Egret on Union is a legally formed entity qualified to do business in Florida. For purposes of this proceeding, Egret on Union’s address, telephone number, and email address are those of its undersigned counsel.

2. Egret on Union submitted an Application in response to the RFA, seeking an award of Housing Credit Financing for Affordable Housing Developments Located in Broward, Duval,

Hillsborough, Lee, Orange, Palm Beach, Pinellas and Polk Counties (“Housing Credit Financing Funding”). Petitioner proposes to build an 88-unit Garden Apartments Development in Pinellas County.

3. Florida Housing is the agency affected by this Petition. Florida Housing’s address is 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301. Florida Housing’s file number for Egret on Union’s application is 2027-022C.

II. Notice

4. Egret on Union received notice of Florida Housing’s intended decision to award funding pursuant to the RFA on September 25, 2026, when Florida Housing’s Board of Directors approved the recommendation of its Review Committee. A copy of the notice posted on the Florida Housing website concerning the Board action is attached as **Exhibit 1**. Egret on Union’s Application was deemed eligible for funding and was not among those selected for a preliminary award based on the sorting and selection criteria in the RFA. For the reasons set forth below, Egret on Union contends that its Application should have been selected.

5. Petitioner timely filed a Notice of Intent to Protest, with attachments, on September 30, 2026. A copy of the notice is attached as **Exhibit 2**.

III. Background

6. Florida Housing is a public corporation created by section 420.504, Florida Statutes, to administer the governmental function of awarding various types of funding for affordable housing in Florida.

7. Florida Housing has the responsibility and authority to establish procedures for allocating and distributing various types of funding for affordable housing. In accordance with that authority, Florida Housing has adopted Chapter 67-60, Florida Administrative Code, which

governs the competitive solicitation process for several programs. Chapter 67-48 also applies to this competitive solicitation for Housing Credit Financing Funding. In addition, Chapter 67-53 governs compliance procedures. Applicants seeking Housing Credit Financing Funding are required to comply with provisions of the RFA and each of the administrative rule chapters referenced in this paragraph. *See* RFA, p. 7 (§ Three F.3).

8. The RFA was issued on July 16, 2026. There was one amendment issued on July 27, 2026. The RFA anticipates the award of an estimated \$33,633,880 of Housing Credits available for award to proposed developments.

9. The RFA sets forth the information that must be submitted by an Applicant and provides a general description of the types of projects that will be eligible for funding. The RFA further outlines a detailed process for selecting developments for an allocation of Housing Credits. *See generally* RFA, pp. 7-83.

10. Applicants are first required to meet certain mandatory eligibility requirements in order to be selected for funding. RFA, pp. 83-85 (§ Five A.1). For example, Applicants must accurately complete a Principals Disclosure Form. RFA, p. 13 (§ Four A.3.c.). Applicants must additionally earn a minimum number of “proximity points” based on the distance between the development and transit services and community services. RFA, pp. 28-33 (§ Four A.5.e.).

11. Applications are further assigned a score. Applicants had the opportunity to earn a maximum of 15 points, as follows:

Point Items	Maximum Points
Submission of Principals Disclosure Form that is stamped “Received” by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped “Approved” prior to the Application Deadline	5
Bookmarking Attachments prior to submission	5
Local Government Contribution Points	5
Total Possible Points	15

RFA, p. 86 (§ Five A.2).

12. The RFA next explains the funding goals for the Applications:

Note: Applications will not be limited to selecting one goal in which to compete; however, Applicants selected to meet one goal will not count towards meeting a second goal, even if the Application meets all qualifications for multiple goals.

- a. Geographic Area of Opportunity/SADDA Goal

The Corporation has a goal to fund one Family Application that qualifies for the Geographic Areas of Opportunity/SADDA Goal as described in Section Four, A.10.a.(1)(d) of the RFA proposing a Development located in the following counties: (i) Broward County, with a preference that it is a Priority 1 Application that also qualifies for the Local Government Areas of Opportunity Designation as described in Section Four, A.11.d. of the RFA; and (ii) Pinellas County.

- b. Local Government Areas of Opportunity Designation Goal

The Corporation has a goal to fund one Application proposing a Development located in Broward, Duval, Hillsborough, Orange, Palm Beach, and Polk County that qualify for the Local Government Areas of Opportunity Goal as described in Section Four, A.11.e. of the RFA.

RFA, p. 86 (§ Five B.1).

13. Because multiple Applicants may achieve the maximum number of points and meet the mandatory eligibility requirements, the RFA also sets forth an Application Sorting Order:

- a. Sorting Order when selecting Applications to meet the Local Government Areas of Opportunity Goal described in 5.b below

When selecting Applications to meet the Local Government Areas of Opportunity Goal as described in Section Four, A.11.e. of the RFA, the highest scoring Applications will be determined by first sorting together all eligible Applications that qualify for the goal from highest score to lowest score, with any scores that are tied separated in the following order:

- (1) First, 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);

- (2) Next, by the Application's Permit Ready Tier status, which is outlined in Section Four, A.7.c. of the RFA (with Applications that qualify as Tier 1 Permit Ready Applications receiving preference above Applications that do not qualify for this preference);
 - (3) Next by Developer Experience Funding Preference, which is outlined in Section Four, A.3.b.(3)(b) of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
 - (4) 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);
 - (5) And finally, by lottery number, resulting in the lowest lottery number receiving preference.
- b. Sorting Order used when selecting Applications except for those that meet the Local Government Areas of Opportunity Goal described in 5.b. below

For each goal, the highest scoring Priority 1 Applications within the county will be determined by first sorting together all eligible Priority 1 Applications that qualify for each goal from highest score to lowest score, with any scores that are tied separated in the following order. This will then be repeated for Priority 2 Applications that qualify for each goal:

- (1) First, 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);
- (2) Next, by the Application's Leveraging Classification, as 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);
- (3) 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;
- (4) Next, by the Application's Permit Ready Tier status, which is outlined in Section Four, A.7.c. of the RFA (with Applications that qualify as Tier 1 Permit Ready Applications receiving preference above Applications that do not qualify for this preference);

- (5) Next by the Developer Experience Funding Preference, which is outlined in Section Four, A.3.b.(3)(b) of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- (6) 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);
- (7) And finally, by lottery number, resulting in the lowest lottery number receiving preference.

RFA, pp. 86-88 (§ Five B.2).

14. Finally, the RFA outlines the Funding Selection Process for eligible Applicants. It provides as follows:

a. Geographic Area of Opportunity/SADDA

(1) Broward County

The first Application selected for funding will be the highest-ranking eligible unfunded Priority 1 Application for a proposed Development located in Broward County that qualifies for both the Geographic Area of Opportunity/SADDA Goal and the Local Government Areas of Opportunity Designation.

If there are no eligible Priority 1 Applications located in Broward County that meet these qualifications, then the first Application selected for funding will be the highest-ranking eligible unfunded Priority 1 Application for a proposed Development located in Broward County that qualifies for the Geographic Area of Opportunity/SADDA Goal.

If there are no eligible Priority 1 Applications located in Broward County that meet these qualifications, then the highest-ranking eligible Priority 2 Application for a proposed Development located in Broward County that qualifies for the Geographic Area of Opportunity/SADDA Goal will be selected for funding.

(2) Pinellas County

The next Application selected for funding will be the highest-ranking eligible unfunded Priority 1 Application for a proposed Development located in Pinellas County that qualifies for the Geographic Area of Opportunity/SADDA Goal.

If there is no eligible Priority 1 Applications for a proposed Development located in Pinellas County that qualify for the Geographic Area of Opportunity/SADDA Goal, then the highest-ranking eligible Priority 2 Application located in Pinellas County that qualifies for the Geographic Area of Opportunity/SADDA Goal will be selected for funding.

b. Local Government Areas of Opportunity Goal

The first Application selected for funding will be the highest-ranking eligible unfunded Priority 1 Application proposing a Development located in Broward County that qualifies for the Local Government Areas of Opportunity Goal described in Section Four A.11.e of the RFA. This will be repeated for Duval, Hillsborough, Orange, Palm Beach, and Polk County.

c. Verification that all counties received a certain number of awards

If Duval, Hillsborough, Orange, Palm Beach, Pinellas, or Polk were not credited with at least one award in a.-b. above, then the highest-ranking eligible Priority 1 Application in those counties without an award will be selected for funding. If Broward County was not credited with at least two awards in a.-b. above, then the highest-ranking eligible Priority 1 Application(s) in Broward County will be selected for funding until two awards have been credited to Broward County.

If Duval, Hillsborough, Orange, Palm Beach, Pinellas, or Polk were still not credited with at least one award in a.-b., nor were there any Priority 1 Applications in the county, then the highest-ranking eligible Priority 2 Application in those counties without an award will be selected for funding. If Broward County was not credited with at least two awards in a.-b. above, nor were there any Priority 1 Applications in the county, then the highest-ranking eligible Priority 2 Application in Broward County will be selected for funding until two awards have been credited to Broward County.

If an Application selected for funding in this section cannot be fully funded, the Application may be awarded a binding commitment, and no further Applications will be selected for funding in this process.

d. Remaining Funding

(1) Additional awards in Hillsborough, Orange, and Palm Beach County

If funding remains, the highest-ranking eligible unfunded Application that qualifies for either the Local Government Areas of Opportunity Goal described in Section Four, A.11.e. of the RFA or Geographic Areas of Opportunity/SADDA Goal will be selected in each of the following counties, if it can be fully funded, with a preference that this is a Priority 1 Application: Hillsborough, Orange, and Palm Beach County.

If funding remains, this will be repeated, until there are no Applications in these counties that can meet the Funding Test.

(2) Additional awards in Broward, Duval, and Pinellas County

If funding remains, the highest-ranking eligible unfunded Application in that qualifies for either the Local Government Areas of Opportunity Goal described in Section Four, A.11.e. of the RFA or Geographic Areas of Opportunity/SADDA Goal will be selected in each of the following counties, if it can be fully funded, with a preference that this is a Priority 1 Application: Broward, Duval, and Pinellas County.

If funding remains this will be repeated, until there are no Applications in these counties that can meet the Funding Test.

- e. If funding remains, no additional Applications from any county will be selected for funding and any remaining funding will be distributed as approved by the Board.

RFA, pp. 86-90 (§ Five B.5).

15. The Review Committee met on September 9, 2026, to score the Applications and select Applicants for funding. There were 44 Applications. The Review Committee determined that 38 Applicants were eligible for funding and that six (6) Applicants were ineligible for funding. *See Exhibit 3* (RFA 2026-202 Application Scores).

16. The Review Committee also used the Funding Selection process to identify the highest-ranking Priority 1 Application that qualified for each of the goals outlined in the RFA. Specifically, the Review Committee recommended the following:

- a. One Application proposing a Development located in Broward County that qualifies for the GAO/SADDA Goal, with preference that also qualifies for the LGAO Designation: The Committee determined that Altamira Residences, Ltd., for its proposed development named Altamira satisfied this Goal.
- b. One Application proposing a Development located in Pinellas County that qualifies for the Geographic Area of Opportunity/SADDA Goal: The Committee determined that Mills Creek PC, LLC, for its proposed development named Mills Creek satisfied this Goal.
- c. One Application proposing a Development located in Broward County that qualifies for the LGAO Goal: The Committee determined that MHP Broward II,

LLC, for its proposed development named Ekos Melrose Manors satisfied this Goal.

- d. One Application proposing a Development located in Duval County that qualifies for the LGAO Goal: The Committee determined that Atlantic Pacific Communities IV, Ltd., for its proposed development named Astor Gardens satisfied this Goal.
- e. One Application proposing a Development located in Hillsborough County that qualifies for the LGAO Goal: The Committee determined that SP Landing LLC, for its proposed development named Summerfield Landing satisfied this Goal.
- f. One Application proposing a Development located in Orange County that qualifies for the LGAO Goal: The Committee determined that there were no Applications that satisfied this Goal.
- g. One Application proposing a Development located in Palm Beach County that qualifies for the LGAO Goal: The Committee determined that Pine Bay Landing LLC, for its proposed development named Pine Bay Landings satisfied this Goal.
- h. One Application proposing a Development located in Polk County that qualifies for the LGAO Goal: The Committee determined that there were no Applications that satisfied this Goal.
- i. Additional Applications if necessary to ensure that all counties received a certain number of awards: The Committee determined that the two following Applications satisfied this Goal; (1) Berkshire Square, Ltd., for its proposed development named Berkshire Square; and (2) Magnolia Place Housing Partners, LP, for its proposed development named Residences at Magnolia Place.
- j. Additional awards in Hillsborough, Orange, and Palm Beach County: The Committee determined that the two following Applications satisfied this Goal; (1) ANR 01, LP, for its proposed development named ANR 01; and (2) HP Apt, LP, for its proposed development named HP Apt.

17. The Board approved the Committee's recommendations at its meeting on September 25, 2026. *See Exhibit 1.*

IV. Substantial Interests Affected

18. Egret on Union's substantial interests are affected because Mills Creek PC, LLC (Application Number 2027-040C) ("Mills Creek") and Monroe Crossings PC, LLC (Application Number 2027-041C) ("Monroe Crossings") are both ineligible for funding. If Florida Housing had

correctly determined that Mills Creek and Monroe Crossings were ineligible for funding, Egret on Union would have been selected for funding pursuant to the RFA.

V. Errors in the Preliminary Awards and Determination of Eligibility:

Mills Creek PC, LLC

A. Mills Creek is Ineligible Because It Failed to Accurately Disclose Its Principals

19. To be eligible for funding, an Applicant must provide a “Principals for Applicant and Developer(s) Disclosure Form” that “meets requirements.” RFA, pp. 83-85 (§ Five A.1) (emphasis added). Those requirements are set out in Section Four of the RFA:

Per subsection 67-48.002(94), F.A.C., the Applicant, Developer(s) and all Principals of the Applicant and Developers that are not a natural person must be a legally formed entity as of the Application Deadline.

RFA, p. 8 (§ Four A.3).

20. The definition of “Principal” in rule 67-48.002 provides:

(94) “Principal” has the meanings set forth below and any Principal other than a natural person must be a legally formed entity as of the Application deadline:

(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.

Fla. Admin. Code R. 67-48.002(94) (emphasis added).

21. Rule 67-48.0075 further states:

(8) Unless otherwise stated in a competitive solicitation, disclosure of the Principals of the Applicant must comply with the following:

(a) **The Applicant must disclose all of the Principals of the Applicant (first principal disclosure level).** For Applicants seeking Housing Credits, the Housing Credit Syndicator/Housing Credit investor need only be disclosed at the first principal disclosure level and no other disclosure is required;

(b) The Applicant must disclose all of the Principals of all the entities identified in paragraph (a) above (second principal disclosure level);

(c) The Applicant must disclose all of the Principals of all of the entities identified in paragraph (b) above (third principal disclosure level). Unless the entity is a trust or a non-profit ... all of the Principals must be natural persons ...; and

(d) If any of the entities identified in (c) above are a trust or a non-profit, the Applicant must disclose all of the Principals of the trust or a non-profit (fourth principal disclosure level), all of whom must be natural persons.

(9) Unless otherwise stated in a competitive solicitation, disclosure of the Principals of each Developer must comply with the following:

(a) **The Applicant must disclose all of the Principals of the Developer (first principal disclosure level);** and

(b) The Applicant must disclose all of the Principals of all the entities identified in paragraph (a) above (second principal disclosure level).

(c) A competitive solicitation may require disclosure of a natural person Principal of the Developer to meet Developer experience requirements.

(10) Applicants awarded funding under this rule chapter shall comply with the compliance procedures set forth in Chapter 67-53, F.A.C.

Fla. Admin. Code R. 67-48.0075(8)-(10) (emphasis added).

22. The RFA requires that any Principal who is not a natural person “must be a legally formed entity as of the Application deadline.” RFA, p. 13 (§ Four A.3.c.(1)). This mandate stems from rule 67-48.002(94) which defines “Principal” as a “legally formed entity as of the Application deadline.” Pursuant to the RFA, a “Principals Disclosure Form should not include, for any organizational structure, any type of entity that is not specifically included in the Rule definition

of Principals.” *Id.* (emphasis added). Accordingly, a form identifying a principal that was not in existence as of the Application Deadline is defective, rendering the Applicant ineligible for funding. *See id.*

i. Mills Creek Inaccurately Completed the Principals Disclosures for the Applicant.

23. Mills Creek is ineligible for funding because it failed to accurately complete the First Principal Disclosure Level for the Applicant, as mandated by the RFA and rule 67-48.0075(8). *See Exhibit 4* (Mills Creek’s Principals Disclosure for the Applicant and Developers).

24. In its Principals Disclosure for the Applicant, Mills Creek identified Mills Creek PC, LLC as the name of the Applicant entity. *Id.* In the First Principal Disclosure Level, seven principals for Mills Creek PC, LLC were identified: one Investor Member (Joseph J. Chambers); three Non-Investor Members (HP Capital Mills Apartments, LLC, Calston Mills, LLC and Housing Opportunities of Pinellas, Inc.); and three Managers (HP Capital Mills Apartments, LLC, Calston Mills, LLC, and Housing Opportunities of Pinellas, Inc.). *Id.*

25. However, Mills Creek did not comply with the requirements of the RFA because it failed to disclose PCHA-Mills GP, LLC as a Principal. Mills Creek PC, LLC is a Florida limited liability company. In its Articles of Organization, filed with the Florida Department of State, Division of Corporations on July 27, 2026 (Document No. L26000397900), Mills Creek identified three managers of the company: (i) PCHA-Mills GP, LLC; (ii) Calston Mills, LLC; and (iii) HP Capital Mills Apartments, LLC. *See Exhibit 5* (Mills Creek’s Articles of Organization).

26. There was no amendment to the Articles of Organization filed on or before the Application Deadline, and no filing of record with the Division of Corporations which removed PCHA-Mills GP, LLC as a manager or one which added any other manager. Therefore, as of the

Application Deadline, PCHA-Mills GP, LLC was a manager, and thus a Principal of the Applicant under Rule 67-48.002(94).

27. The Principals Disclosure Form submitted with the Mills Creek Application does not identify PCHA-Mills GP, LLC at any disclosure level. Instead, Mills Creek identifies Housing Opportunities of Pinellas, Inc. (“HOPI”) as a first-level Principal of the Applicant, together with Calston Mills, LLC and HP Capital Mills Apartments, LLC. *See Exhibit 4* (Principals Disclosure for Applicant and Developers).

28. PCHA-Mills GP, LLC is a separate legal entity. It was formed by, and is owned by, HOPI. HOPI’s ownership of PCHA-Mills GP, LLC does not make HOPI a manager of the Applicant, and it does not make PCHA-Mills GP, LLC anything other than what the public record shows it to be: a manager of Mills Creek PC, LLC that the Applicant failed to disclose. *See Exhibit 6* (Articles of Organization for PCHA-Mills GP, LLC).

29. The RFA requires that the Principals Disclosure Form “identify . . . the Principals of the Applicant . . . as of the Application Deadline” and that it meet the requirements of Rule 67-48.002. The rule defines the Principals of a limited liability company as “**each** manager and **each** member.” Because PCHA-Mills GP, LLC was a manager of Mills Creek as of the Application Deadline it was required to be disclosed on the Principals Disclosure Form. Since the Mills Creek Application failed to identify PCHA-Mills GP, LLC, it is ineligible for funding.

30. The Principals Disclosure Form did not merely misname a disclosed entity. It disclosed a different entity -- HOPI -- and omitted the manager of record altogether.

31. The chronology of events forecloses any suggestion that the omission resulted from a later change in the Applicant’s structure. Mills Creek PC, LLC came into existence at 8:00 a.m. on July 27, 2026, with PCHA-Mills GP, LLC named in its Articles of Organization as a manager.

That same day, the Applicant sent Florida Housing a Principals Disclosure Form that omitted PCHA-Mills GP, LLC as the manager, instead listing HOPI. Section Four of the RFA (§ Four A.3.c.(2)) expressly permitted Mills Creek to edit and resubmit its disclosures “for any reason” prior to the Application Deadline. But, Mills Creek did not correct its Principals Disclosures at any time prior to the Application Deadline.

ii. Mills Creek Inaccurately Completed the Principals Disclosures for the Developer.

32. Mills Creek is also ineligible for funding because in response to Section Four A.3.b.(1) of the RFA, the Mills Creek Application identifies three Developer entities: (i) HP Capital Mills Development, LLC; (ii) Calston Mills Developer, LLC; and (iii) HOP- Targeted Opportunities in Time, Inc. *See Exhibit 7* (Section Four A.3.b.(1) of Mills Creek’s Application).

33. There is no Florida corporation and no foreign corporation authorized to transact business in Florida named “HOP-Targeted Opportunities in Time, ***Inc.***” existing as of the Application Deadline. *See Exhibit 8* (Division of Corporations search results for “HOP-Targeted Opportunities in Time, Inc.”)

34. The Principals Disclosure Form for the Developer (*See Exhibit 4*) and the Certificate of Status (*See Exhibit 9*) instead list a different entity, “HOP-Targeted Opportunities in Time, ***LLC.***” That entity is a Florida limited liability company, not a corporation.

35. The identity of each Developer is fundamental to the RFA. It determines, among other things, whose Principals must be disclosed, whose experience is relied upon, and whose history must be reviewed under section 420.518, Florida Statutes. For that reason, the RFA makes both the name of each Developer and evidence that each named Developer is a legally formed entity separate and distinct Eligibility Items. RFA, p. 83 (§ Five A.1). Rule 67-48.002(94) also

requires that “any Principal other than a natural person must be a legally formed entity as of the Application deadline.”

36. A corporation and a limited liability company are distinct legal persons governed by distinct statutes, Chapters 607 and 605, Florida Statutes, respectively. Likewise, the Principals are defined differently under Rule 67-48.002(94).

37. The Developer identified in response to Section Four A.3.b.(1) -- HOP-Targeted Opportunities in Time, Inc. -- was not a legally formed entity as of the Application Deadline, and no Principals of any such corporation were disclosed. The entity whose Principals were disclosed, “HOP-Targeted Opportunities in Time, LLC,” was not the entity identified as a Developer.

38. Attachment 3 to Mills Creek’s Application (*see Exhibit 9*) cannot cure this defect because it evidences the LLC, not the named corporation. Mills Creek therefore failed to provide “[e]vidence that each Developer entity is a legally formed entity qualified to do business in the state of Florida as of the Application Deadline,” as Section Four A.3.b.(2) and Section Five A.1 require.

39. This inconsistency cannot be resolved in Mills Creek’s favor. Choosing which of two statutorily distinct and differently named entities Mills Creek intended to designate as its Developer would require Florida Housing to accept extrinsic explanation after the deadline, in violation of section 120.57(3)(f), Florida Statutes. *See HTG Oak Valley, LLC v. Fla. Hous. Fin. Corp.*, No. 19-2275BID, ¶¶ 16-17 (Fla. DOAH July 16, 2019) (Recommended Order), adopted in pertinent part, No. 2019-032BP (FHFC Aug. 5, 2019) (Final Order).

40. Because Mills Creek’s Application failed to identify a legally formed Developer entity and failed to disclose the Principals of HOP- Targeted Opportunities in Time, Inc., the Application fails to meet three different Eligibility Items, including: (1) “Name of Each Developer

provided,” (2) “Evidence that each Developer entity is a legally formed entity qualified to do business in the state of Florida as of the Application Deadline provided,” and (3) “Principals for Applicant and Developer(s) Disclosure Form provided and meets requirements.”

41. These fatal errors constitute a complete failure to meet the requirements of the RFA, and Mills Creek must be deemed ineligible for funding. *Blue Broadway, LLC, v. Fla. Hous. Fin. Corp.*, No. 17-3273, ¶ 50 (Fla. DOAH Aug. 29, 2017) (Recommended Order), No. 2017-032BP (FHFC Sept. 22, 2017) (Final Order) (the failure to identify all officers, directors, and shareholders for a developer entity rendered the initial eligibility determination as erroneous); *HTG Village View, LLC v. Marquis Partners, Ltd. and Fla. Hous. Fin. Corp.*, No. 18-2156BID (Fla. DOAH July 27, 2018) (Recommended Order), ¶¶ 49-53, adopted in pertinent part, No. 2018-017BP (FHFC Sept. 14, 2018) (Final Order); *MJHS S. Parcel, Ltd. v. Fla. Hous. Fin. Corp.*, No. 23-0903BID (Fla. DOAH May 31, 2023) (Recommended Order), No. 23-007BP (FHFC July 21, 2023) (Final Order); compare **Exhibit 10** (Formal Written Protest and Petition for Administrative Hearing filed in *HTG Astoria, Ltd. v. Fla. Hous. Fin. Corp.*, No. 21-0725 (Fla. DOAH Feb. 23, 2021) (alleging that an applicant granted funding had disclosed only the “sole member” of an LLC and had neglected to name the manager in its principal disclosure form) with **Exhibit 11** (Stipulation for Entry of Findings of Fact and Recommended Order in Favor of Petitioner filed in *HTG Astoria, Ltd. v. Fla. Hous. Fin. Corp.*, No. 21-0725 (Fla. DOAH March 25, 2021) (recognizing Florida Housing’s agreement that applicant was ineligible for funding).

B. Mills Creek is Ineligible for Funding Because Its Application Does Not Meet the Minimum Transit Service and Total Proximity Requirements

i. Mills Creek's Identified Public Bus Stops Do Not Meet the Requirements of the RFA.

42. Section Four A.5.e of the RFA provides that an Application “may earn proximity points based on the distance between the Development Location Point and the Bus or Rail Transit Service . . . and the Community Services stated in Exhibit A,” awarded according to the scoring charts in Item 2 of Exhibit C. Proximity points are not applied toward the total score; they “will only be used to determine whether the Applicant meets the required minimum proximity eligibility requirements and the preferences outlined” in the RFA. An Applicant selecting the Public Bus Stop transit service under Section Four A.5.e.(2)(b) may earn a maximum of six points, and “[e]ach Public Bus Stop must meet the definition of Public Bus Stop as defined in Exhibit B.”

43. Exhibit B defines a Public Bus Stop as follows:

A fixed location at which passengers may access one or two routes of public transportation via buses. The Public Bus Stop must service at least one bus route that either (i) has scheduled stops at least hourly during the times of 7am to 9am and also during the times of 4pm to 6pm Monday through Friday, excluding holidays, on a year-round basis; or (ii) has the following number of scheduled stops within a 24 hour period, Monday through Friday, excluding holidays, on a year-round basis, for the applicable county size; Small and Medium Counties: 12 scheduled stops[;] Large Counties: 18 scheduled stops. . . . Additionally, it must have been in existence and available for use by the general public as of the Application Deadline.

44. Pinellas County is a Large County pursuant to the RFA. Therefore, any identified Public Bus Stops must either have hourly scheduled stops from 7:00-9:00 a.m. and 4:00-6:00 p.m., or at least 18 scheduled stops within a 24-hour period, Monday through Friday. *See id.*

45. Section Four A.5.e further provides that all Applications, “with the exception of Applications that qualify for the Local Government Areas of Opportunity Designation, must achieve a minimum number of Transit Service Points” and “a minimum number of total proximity points to be eligible for funding.” For Pinellas County Applications that do not qualify for the Local Government Areas of Opportunity Designation, the RFA chart requires a minimum of 2.0 Transit Service Points (1.5 if the Application qualifies for the PHA or RD 515 Proximity Point Boost) and a minimum of 10.5 Total Proximity Points. RFA, p. 29. 12.5 points are required for the Proximity Funding Preference. *Id.* The three point PHA or RD 515 boost “will not count toward meeting the Minimum Transit Services score.” RFA, p. 30 (§ Four A.5.e.(1)(a)–(c)).

46. Mills Creek’s Application claims two Public Bus Stops: Public Bus Stop 1: 28.126374 -82.759446, 0.05 mi. and Public Bus Stop 2: 28.125853 -82.759508, 0.08 mi. Mills Creek was awarded two points for each stop, or four Transit Service points in total. *See Exhibit 12* (Mills Creek’s Proximity Worksheets).

47. According to the published schedules of the Pinellas Suncoast Transit Authority in effect as of the Application Deadline, the route or routes serving each claimed stop make their first scheduled stop after 8:00 a.m. No bus is scheduled to stop at either location, or at any point on the serving route, before 8:00 a.m. on any weekday. *See Exhibit 13* (Pinellas Suncoast Transit Authority schedules for route(s) Jolley Trolley Coastal in effect as of August 13, 2026).

48. Neither claimed stop satisfies the hourly service requirement. The RFA requires scheduled stops at least hourly during the 7:00 a.m. to 9:00 a.m. window. Because the Public Bus Stop 1 identified by Mills Creek does not have its first scheduled stop anywhere on the route until after 8:00 a.m. and provides no scheduled service during the 7:00 a.m. hour, it cannot provide hourly service throughout the morning window as required by the RFA.

49. Alternatively, the identified stops must have 18 scheduled stops in a Large County within a 24-hour period. The route or routes serving both the bus stops claimed by Mills Creek make no more than 17 scheduled stops per day, and thus falls short of the RFA's threshold.

50. Because neither bus stop identified in Mills Creek's Application meets either prong of the definition of a "Public Bus Stop," neither can be classified as a "Public Bus Stop" within the meaning of the RFA, and Mills Creek is not entitled to any Transit Service points for either stop.

51. With no Transit Service points, Mills Creek's Application fails to meet the Minimum Transit Score of 2.0 points, and its Total Proximity Score falls to 9 points, below the required minimum of 10.5 points and rendering Mills Creek ineligible for funding.

ii. Mills Creek is Not Entitled to Proximity Points for its Claimed Community Services (Grocery Store).

52. Section Four A.5.e.(3) of the RFA permits an Applicant to select up to three Community Services, for a maximum of four proximity points each, from among services such as a Grocery Store, Medical Facility, Pharmacy, and Public School. Exhibit B defines a "Grocery Store" as follows:

A retail food store consisting of 4,500 square feet or more of contiguous air-conditioned space available to the public, that has been issued a food permit, current and in force as of the dates outlined below, issued by the Florida Department of Agriculture and Consumer Service (FDACS) which designates the store as a Grocery Store or Supermarket within the meaning of those terms for purposes of FDACS-issued food permits.

Additionally, it must have (i) been in existence and available for use by the general public continuously since a date that is 6 months prior to the Application Deadline; or (ii) been in existence and available for use by the general public as of the Application Deadline AND be one of the following: Albertson's, Aldi, . . . Winn-Dixie.

53. Per the RFA's definition, a newly opened Aldi may qualify for proximity points only under prong (ii), which requires that the store have "been in existence and available for use by the general public as of the Application Deadline," and that its FDACS food permit be "current and in force" as of that date.

54. Mills Creek claimed 3 proximity points for an Aldi Grocery Store located at 1171 S. Pinellas Avenue, Tarpon Springs, Florida. *See Exhibit 12* (Mills Creek's Proximity Worksheets).

55. However, as of the Application Deadline (August 13, 2026), the Aldi store was not open to the public. The building, a former Winn-Dixie store, had been undergoing renovation since late 2025 and it did not open to the general public until one week after the Application Deadline.

56. A store that has not opened its doors is not in existence and available for use by the general public. On August 13, 2026, no member of the public could have purchased groceries at the claimed Aldi. The RFA measures proximity to services that actually exist as of the Application Deadline, not services an Applicant anticipates will open later. *See MJHS South Parcel, Ltd. v. Fla. Hous. Fin. Corp.*, No. 23-0903BID, ¶ 110 (Fla. DOAH May 31, 2023) (Recommended Order), No. 23-007BP (FHFC July 21, 2023) (Final Order). Therefore, Mills Creek improperly claimed 3 proximity points for its identified Grocery Store.

57. Without the 3 proximity points for its claimed Grocery Store, Mills Creek's Total Proximity Score drops to 10 points, which is below the minimum of 10.5 Total Proximity Points required of Large County Applications that do not qualify for the Local Government Areas of Opportunity Designation. Mills Creek is therefore ineligible for funding.

58. Notably, even if Mills Creek could resolve the issue related to the Grocery Store's availability to the general public (which it cannot), the RFA independently requires that a Grocery Store be a retail food store "that has been issued a food permit, current and in force as of the dates

outlined below, issued by the Florida Department of Agriculture and Consumer Services (FDACS) which designates the store as a Grocery Store or Supermarket.” RFA, p. 114 (Exhibit B, “Grocery Store”). For an Aldi, the operative date is the Application deadline. The Aldi’s FDACS food permit was not issued until August 14, 2026, the day after the Application Deadline, further rendering Mills Creek’s Application ineligible. *See Exhibit 14* (Aldi Food Permit issued on August 14, 2026).

Monroe Crossings PC, LLC

A. Monroe Crossings is Ineligible Because It Failed to Accurately Disclose Its Principals

59. Monroe Crossings is ineligible for funding because it failed to accurately complete the First Principal Disclosure Level for the Applicant, as mandated by the RFA and rule 67-48.0075(8). *See Exhibit 15* (Monroe Crossings’ Principals Disclosure for the Applicant and Developers).

60. In its Principals Disclosure for the Applicant, Monroe Crossings identified Monroe Crossings PC, LLC as the name of the Applicant entity. *Id.* In the First Principal Disclosure Level, seven principals for Monroe Crossings PC, LLC were identified: one Investor Member (Joseph J. Chambers); three Non-Investor Members (HP Capital Monroe Apartments, LLC, Calston Monroe, LLC and Housing Opportunities of Pinellas, Inc.); and three Managers (HP Capital Monroe Apartments, LLC, Calston Monroe, LLC, and Housing Opportunities of Pinellas, Inc.). *Id.*

61. However, Monroe Crossings did not comply with the requirements of the RFA because it failed to disclose PCHA-Monroe GP, LLC as a Principal. Monroe Crossings PC, LLC is a Florida limited liability company. Its Articles of Organization, filed with the Florida Department of State, Division of Corporations, identify three managers of the company: (i) PCHA-

Monroe GP, LLC; (ii) Calston Monroe, LLC; and (iii) HP Capital Monroe Apartments, LLC. *See Exhibit 16* (Articles of Organization for Monroe Crossings PC, LLC).

62. No amendment to the Articles of Organization was filed on or before the Application Deadline, and no filing of record removed PCHA-Monroe GP, LLC as a manager or added any other manager. As of the Application Deadline, PCHA-Monroe GP, LLC was therefore a manager, and thus a Principal, of the Applicant under Rule 67-48.002(94).

63. The Principals Disclosure Form submitted with the Monroe Crossings Application does not identify PCHA-Monroe GP, LLC at any disclosure level. In its place, the Form identifies Housing Opportunities of Pinellas, Inc. (“HOPI”) as a first-level Principal of the Applicant. The Form discloses Calston Monroe, LLC and HP Capital Monroe Apartments, LLC, consistent with the Articles of Organization. *See Exhibit 15* (Principals Disclosure for Monroe Crossings).

64. PCHA-Monroe GP, LLC is a separate legal entity formed by, and owned by, HOPI. Because it was omitted at the first principal disclosure level, its own managers and members were not disclosed at the second level as the Form requires. *See Exhibit 17* (Articles of Organization for PCHA-Monroe GP, LLC).

65. The Monroe Crossings Application suffers from the same disqualifying defect as the Mills Creek Application. As of the Application Deadline, PCHA-Monroe GP, LLC was a manager of Monroe Crossings PC, LLC, and therefore a Principal of the Applicant under Rule 67-48.002(94). The Principals Disclosure Form does not disclose it and instead lists HOPI in its place. The Form therefore fails to “identify . . . the Principals of the Applicant . . . as of the Application Deadline” as the RFA requires, and the Application fails the Principals Disclosure Eligibility Item.

B. Monroe Crossings is Not Entitled to the Proximity Funding Preference

66. The RFA allows Applicants to earn proximity points based on the distance between the Development Location Point and Transit Services, including Public Bus Stops, and Community Services such as grocery stores, medical facilities, pharmacies, and public schools. RFA, pp. 28-32 (§ Four A.5.e). Proximity points are not applied toward an Application's total score. They "will only be used to determine whether the Applicant meets the required minimum proximity eligibility requirements and the preferences outlined" in the RFA. *See Exhibit 18* (Proximity Worksheets for Monroe Crossings).

67. One of the preferences outlined in the RFA is the Proximity Funding Preference. The Proximity Funding Preference is a tiebreaker in the sorting order used to select Applications for funding: Applications are sorted by total score, and tied scores are separated first by the Development Category Funding Preference, next by Leveraging Classification, and then by "the Application's eligibility for the Proximity Funding Preference . . . with Applications that qualify for the preference listed above Applications that do not qualify for the preference." RFA, p. 87 (§ Five B.2.b.(3)). A Large County Application that does not qualify for the Local Government Areas of Opportunity Designation must achieve 12.5 or more total proximity points to receive the Proximity Funding Preference. RFA, p. 29 (§ Four A.5.e).

68. Transit Service points for Public Bus Stops are calculated using the Transit Service Scoring Charts in Exhibit C, which award points based on the number of qualifying Public Bus Stops and the distance between the Development Location Point and the furthest of them. RFA, pp. 126-127 (Exhibit C, Item 2.a). An Applicant relying on one Public Bus Stop within 0.30 miles receives 2.0 points; an Applicant relying on two Public Bus Stops receives up to 4.0 points; and an Applicant relying on three Public Bus Stops receives up to 6.0 points. An Applicant can therefore

increase its Transit Service score only by identifying additional stops that each independently qualify.

69. The RFA limits the circumstances in which more than one stop on the same route may be counted. Section Four A.5.e.(2)(b)(ii) provides: “Each Public Bus Stop must meet the definition of Public Bus Stop as defined in Exhibit B. Each Public Bus Stop, except for Sister Stops, must serve at least one unique route. Up to two of the selected Public Bus Stops may be Sister Stops as defined in Exhibit B.” RFA, p. 31.

70. Exhibit B defines a “Sister Stop” as “two bus stops that (i) individually, each meet the definition of Public Bus Stop; (ii) are separated by a street or intersection from each other; (iii) are within 0.2 miles of each other; (iv) serve the same bus route(s); and (v) the buses travel in different directions.” RFA, p. 118 (Exhibit B). The five elements are conjunctive. A pair of stops that fails any one of the elements is not a pair of Sister Stops.

71. Read together, these provisions mean that where an Applicant relies on two stops that serve the same route with buses traveling in different directions, both stops may be counted for proximity points only if they satisfy every element of the Sister Stop definition, including the requirement that they be “separated by a street or intersection from each other.”

72. The Monroe Crossings Application identifies the Development Site as 17068 US Hwy 19 N, with a Development Location Point at latitude 27.927969 and longitude -82.734245. See **Exhibit 19** (Application, “Development Location” worksheet, p. 12 of 39).

73. In its responses to Section 5.e of Exhibit A, Monroe Crossings claimed three Public Bus Stops. See **Exhibit 18** (Proximity Worksheets for Monroe Crossings):

- a. Public Bus Stop 1: latitude 27.926233, longitude -82.730755, at a stated distance of 0.24 miles, corresponding to PSTA Stop #4174 located at Us Hwy 19 N + 17116, serving PSTA Route 19;

- b. Public Bus Stop 2: latitude 27.9263953, longitude -82.7301756, at a stated distance of 0.27 miles, corresponding to PSTA Stop #4166 located at Us Hwy 19 N + 16991, serving PSTA Route 19; and
- c. Public Bus Stop 3: latitude 27.916438, longitude -82.732260, at a stated distance of 0.80 miles, corresponding to PSTA Stop #4029 located at East Bay Dr + Sawmill Ave, serving PSTA Route 52.

74. Because the furthest of the three claimed stops is 0.80 miles from the Development Location Point, Monroe Crossings received 4.5 Transit Service points under the three-stop Transit Service Scoring Chart. RFA, p. 127. Together with 9.5 Community Services points (3.0 points for a Grocery Store, 3.0 points for a Pharmacy, and 3.5 points for a Public School), Monroe Crossings was credited with 14 total proximity points and the Proximity Funding Preference. (See **Exhibit 18**, Application, p. 14 of 39). Monroe Crossings did not claim the PHA or RD 515 Proximity Point Boost and does not qualify for the Local Government Areas of Opportunity Designation.

75. Monroe Crossings' identified Public Bus Stops 1 and 2 serve the same route or routes, PSTA Route 19, with buses traveling in different directions. Monroe Crossings therefore relied on Stops 1 and 2 as Sister Stops, and, as such, it could claim proximity points for both only if they satisfy the Sister Stop definition. See **Exhibit 20** (Pinellas Suncoast Transit Authority route and stop data for the stops at the coordinates claimed by Monroe Crossings, in effect as of August 13, 2026).

76. Public Bus Stops 1 and 2, however, do not meet the Sister Stop definition in the RFA. Public Bus Stops 1 and 2 are located on opposite sides of U.S. Highway 19. They are not separated by "a street or intersection." Rather, the stops are separated by three distinct roadways: the U.S. Highway 19 limited access highway with 6 travel lanes (3 in each direction) which is divided by a concrete barrier, in addition to two 2-lane frontage roads that parallel it on either side,

separated by two additional concrete barriers. *See Composite Exhibit 21* (Aerial images showing Public Bus Stops 1 and 2).

77. Measured in a straight line between the stated coordinates, Stops 1 and 2 are approximately 0.04 miles apart. Because of the intervening highway, however, a pedestrian cannot travel directly between them. The shortest walking route between Stop 1 and Stop 2 runs north/south along the frontage road to the underpass crossing at Whitney Rd, a distance of approximately 0.5 miles. *See Composite Exhibit 21*. In sum, a resident could not walk directly across the street from Stop 1 to Stop 2.

i. Stops 1 and 2 Are Not “Separated by a Street or Intersection.”

78. The Sister Stop definition requires that the two stops be “separated by a street or intersection from each other.” RFA, p. 118. The definition uses the singular: *a* street or *an* intersection. Stops 1 and 2 are separated by three roadways, the U.S. Highway 19 mainline and two frontage roads. Three roadways are not “a street,” and a highway corridor of that kind is not “an intersection.”

79. The remaining elements of the definition confirm its reach. Sister Stops must “serve the same bus route(s)” and “the buses [must] travel in different directions.” RFA, p. 118. The definition thus describes the familiar pair of stops that face each other across a single street and serve the same route in opposite directions, so that a resident can reach either stop by crossing that street. Stops on opposite sides of a highway and its two frontage roads do not fit that description. A rider at one cannot readily reach the other, and the two stops do not function as a single point of access to the route.

ii. In the Alternative, Stops 1 and 2 Are Not “Within 0.2 Miles of Each Other”

80. The Sister Stop definition also requires that the two stops be “within 0.2 miles of each other.” RFA, p. 118. Unlike the distances between the Development Location Point and each claimed service, which the RFA expressly measures between latitude and longitude coordinates as grid distances, (RFA, pp. 30-33 (§ Four A.5.e.(2), (4))), the RFA does not specify how the 0.2 mile separation between Sister Stops is measured. Where the RFA addresses how a person actually reaches a service, it measures by walking access. For example, distances to Community Services are measured from the doorway threshold of an exterior public entrance, and, where there is none, from the entrance “that is the closest walking distance” to the interior public entrance. RFA, p. 32 (§ Four A.5.e.(3)). Read consistently with that approach and with the purpose of the Sister Stop definition, the 0.2 mile limit is measured by the distance a rider must travel between the two stops. Measured that way, Stops 1 and 2 are approximately 0.5 miles apart and do not satisfy the definition.

81. Because Stops 1 and 2 are not “separated by a street or intersection from each other,” they do not meet the definition of Sister Stops, and Monroe Crossings may not receive proximity points for both. RFA, pp. 31, 118.

82. Alternatively, counting a single stop within 0.30 miles of the Development Location Point, Monroe Crossings is entitled to no more than 2.0 Transit Service points under the one-stop Transit Service Scoring Chart. RFA, p. 126. Its Transit Service score therefore falls from 4.5 points to 2.0 points. A Transit Service score of 2.0 points still satisfies the RFA’s 2.0 point Minimum Transit Score, and Monroe Crossings’ resulting total of 11.5 proximity points satisfies the 10.5 point minimum. RFA, pp. 29-30 (§ Four A.5.e). But 11.5 points is below the 12.5 points required

to receive the Proximity Funding Preference. RFA, p. 29. Therefore, Monroe Crossings is not eligible for the Proximity Funding Preference.

83. Florida Housing and the Division of Administrative Hearings have consistently denied proximity points for transit services that do not satisfy the RFA's definitions. *See Capital Grove Ltd. P'ship v. Fla. Hous. Fin. Corp.*, No. 15-002386BID, ¶ 49 (Fla. DOAH August 3, 2015) (Recommended Order) (finding that a Public Bus Transfer Stop claimed by applicant was not a "fixed location" for purposes of the RFA and was "not entitled to obtain proximity points"); *see also Houston Street Manor Ltd. P'ship v. Fla. Hous. Fin. Corp.*, No. 15-3302BID, ¶¶ 23-32 (Fla. DOAH Aug. 18, 2015) (Recommended Order) (opining that "misrepresenting the true nature" of a bus stop was a material deviation and recognizing that applicant cannot receive points for a quality established by evidence submitted only after bid opening), No. 2015-024BP (FHFC Sept. 18, 2015) (Final Order); *Berkeley Landing, Ltd. v. Fla. Hous. Fin. Corp.*, No. 20-0140BID, ¶ 111 (Fla. DOAH Apr. 6, 2020) (Recommended Order) (finding that applicant's bus stop failed to meet the definition of a "Public Bus Rapid Transit Stop" and was not entitled to proximity points), *adopted in pertinent part*, No. 2019-102BP (FHFC Apr. 17, 2020) (Final Order); *Quail Roost Trans. Village II, Ltd. v. Fla. Hous. Fin. Corp.*, No. 23-0674BID, ¶ 77 (Fla. DOAH May 10, 2023) (Recommended Order) (finding that the application's claimed transit service failed to meet the RFA definition of a Public Bus Rapid Transit Stop and was accordingly not entitled to receive any transit points), No. 2023-011BP (FHFC June 9, 2023) (Final Order). The same result follows here. A pair of stops that does not meet the Sister Stop definition cannot be used to earn points reserved for Sister Stops.

84. Even if only Stop 2 is excluded from Monroe Crossings' claimed Transit Services, it still cannot overcome this error. When the remaining claimed stops (Stops 1 and 3) are scored

under the two-stop Transit Service Scoring Chart per the RFA, which measures to the furthest claimed stop, a furthest distance of 0.80 miles yields 0.0 points. RFA, p. 127. On that application, Monroe Crossings would fail the 2.0 point Minimum Transit Score and would be ineligible for funding per Section Five A.1.

85. When Mills Creek and Monroe Crossings are each properly deemed ineligible for funding, Petitioner is the highest ranking eligible unfunded Priority 1 Application in Pinellas County that qualifies for the Geographic Area of Opportunity / SADDA Goal, and Section Five B.5.a.(2) requires that it be selected for funding.

86. In the alternative, if Monroe Crossings is not deemed ineligible, it is not entitled to the Proximity Funding Preference for the reasons outlined above. Without that preference, Monroe Crossings ranks below Egret on Union through the sorting order's third tiebreaker because Egret on Union qualifies for the Proximity Funding Preference. Therefore, it would rank below the Petitioner under the sorting order in Section Five B.2.b. of the RFA.

87. Accordingly, Florida Housing should select Egret on Union, Application No. 2027-022C, for funding in the Pinellas County Geographic Area of Opportunity / SADDA slot under Section Five B.5.a.(2), in the amount of \$3,200,000, and should apply the funding selection process in Section Five B.5 to the remaining Applications on that basis.

VI. Disputed Issues of Material Fact and Law

88. Disputed issues of material fact and law include the following:

- a. Whether Florida Housing's Approved Scoring Results are contrary to the agency's governing statutes, the agency's rules or policies, or the solicitation specifications;
- b. Whether Florida Housing's Approved Scoring Results are clearly erroneous, contrary to competition, arbitrary, or capricious;

- c. Whether Mills Creek's Application meets the requirements of the RFA;
- d. Whether Mills Creek should be deemed ineligible for submitting an incorrect Principals Disclosure Form to Florida Housing;
- e. Whether Mills Creek properly disclosed all Principals of the Applicant as identified in the Application;
- f. Whether Mills Creek's Application identified each Developer as of the Application Deadline;
- g. Whether Mills Creek properly disclosed all Principals of each Developer identified in the Application;
- h. Whether Mills Creek provided the evidence required by Section Four A.3.b.(2) and Section Five A.1 of the RFA that each Developer entity was a legally formed entity qualified to do business in Florida as of the Application Deadline;
- i. Whether Mills Creek's Application meets the Eligibility Items "Name of Each Developer provided," "Evidence that each Developer entity is a legally formed entity qualified to do business in the state of Florida as of the Application Deadline provided," and "Principals for Applicant and Developer(s) Disclosure Form provided and meets requirements";
- j. Whether Mills Creek obtained the Transit Service Points required to be eligible for funding under the RFA;
- k. Whether the bus stops identified by Mills Creek meet the RFA's definition of a Public Bus Stop;
- l. Whether the grocery store identified by Mills Creek met the RFA's definition of a Grocery Store;

- m. Whether the grocery store identified by Mills Creek was in existence and available for use by the general public as of the Application Deadline;
- n. Whether the grocery store identified by Mills Creek had been issued a food permit, current and in force as of the Application Deadline;
- o. Whether Mills Creek met the Minimum Total Proximity Score required to be eligible for funding under the RFA;
- p. Whether Monroe Crossings' Application meets the requirements of the RFA;
- q. Whether Monroe Crossings should be deemed ineligible for submitting an incorrect Principals Disclosure Form;
- r. Whether Monroe Crossings properly disclosed all Principals of the Applicant identified in the Application;
- s. Whether the bus stops identified by Monroe Crossings meet the definition of a "Sister Stop" under the RFA;
- t. Whether Monroe Crossings achieved the Proximity Funding Preference;
- u. Whether Monroe Crossings obtained the Transit Service Points required to be eligible for funding under the RFA; Whether Florida Housing's proposed award of funding to Mills Creek is clearly erroneous, arbitrary and capricious, or contrary to competition; and
- v. Whether Florida Housing's determination that Monroe Crossings is eligible for funding (and therefore next in line for selection after Mills Creek) is clearly erroneous, arbitrary and capricious, or contrary to competition.

VII. Statement of Ultimate Facts

89. The ultimate facts alleged are that Mills Creek and Monroe Crossings are not eligible for funding. As a result of this determination, Egret on Union should be awarded the funding for the Pinellas County goal.

VIII. Right to Amend

90. Petitioner reserves the right to amend this petition if disputed issues of material fact or law become known during the course of discovery in this proceeding.

IX. Statutes and Rules that Entitle Petitioner to Relief

91. Statutes and rules entitling Petitioner to Relief are Part V of Chapter 420, Florida Statutes; sections 120.569 and 120.57, Florida Statutes; Chapters 67-48, 67-60, 67-53, and rules 28-106 and 28-110, Florida Administrative Code.

X. Demand for Relief

92. Pursuant to section 120.57(3), Florida Statutes and Florida Administrative Code Rule 28-100.004, Egret on Union requests the following relief:

- a. Florida Housing schedule a meeting with Petitioner to discuss resolution of this protest within seven business days, as required by section 120.57(3)(d)1., Florida Statutes;
- b. If the matter cannot be resolved, that Florida Housing refer this petition to the Division of Administrative Hearings for assignment of an Administrative Law Judge (ALJ);
- c. The ALJ enter a Recommended Order holding that Mills Creek and Monroe Crossings are ineligible for funding, awarding funding to Egret on Union, and inviting Egret on Union to the credit underwriting process;
- d. That Florida Housing adopt the Recommended Order of the ALJ as a Final Order.

Respectfully submitted this 12th day of October, 2026.

/s/ Christopher B. Lunny

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**COUNSEL FOR PETITIONER,
EGRET ON UNION, LTD.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Formal Written Protest and Petition for Administrative Hearing has been filed by email to the Florida Housing Finance Corporation Clerk at CorporationClerk@floridahousing.org this 12th day of October, 2026.

/s/ Christopher B. Lunny

CHRISTOPHER B. LUNNY

RFA 2026-202 Board Approved Preliminary Awards

Page 1 of 1

Total HC Available for RFA	33,633,880
Total HC Allocated	32,129,000
Total HC Remaining	1,504,880

Application Number	Name of Development	County	Name of Authorized Principal Representative	Developers	Demo	Total Units	HC Funding Amount	Priority Level	Limited to one Priority 1 award?	Nickname of group of P1 Apps if limit applies	Qualifies for the Geographic Areas of Opportunity / SADDA Goal	Qualifies for the LGAO Designation	Qualifies for the LGAO Goal	Total Points	Development Category Funding Preference	Leveraging Classification	Proximity Funding Preference	Permit Ready Application?	Permit Ready Tier Status	Developer Experience Funding Preference	Florida Job Creation Preference	Lottery Number
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One Application proposing a Development located in Broward County that qualifies for the GAO / SADDA Goal, with preference that it also qualifies for the LGAO Designation

2027-019C	Altamira	Broward	Mara S. Mades	Cornerstone Group Partners, LLC	F	90	\$3,800,000	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	6
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One Application proposing a Development located in Pinellas County that qualifies for the Geographic Area of Opportunity / SADDA Goal

2027-040C	Mills Creek	Pinellas	Joseph J. Chambers	HP Capital Mills Development, LLC; Calston Mills Developer, LLC; HOP - Targeted Opportunities in Time, Inc.	F	78	\$2,100,000	1	N		Y	N	N	15	Y	A	Y	Y	1	Y	Y	30
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One Application proposing a Development located in Broward County that qualifies for the LGAO Goal

2027-013C	Ekos Melrose Manors	Broward	Christopher L. Shear	MHP Broward II Developer, LLC	F	120	\$3,800,000	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	7
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One Application proposing a Development located in Duval County that qualifies for the LGAO Goal

2027-021C	Astor Gardens	Duval	Kenneth Naylor	APC Development IV, LLC	F	96	\$3,200,000	1	N		Y	Y	Y	15	Y	A	N	N	2	Y	Y	37
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One Application proposing a Development located in Hillsborough County that qualifies for the LGAO Goal

2027-024C	Summerfield Landing	Hillsborough	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	F	130	\$3,500,000	1	N		Y	Y	Y	15	Y	A	N	N	2	Y	Y	19
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One Application proposing a Development located in Orange County that qualifies for the LGAO Goal

none

One Application proposing a Development located in Palm Beach County that qualifies for the LGAO Goal

2027-005C	Pine Bay Landings	Palm Beach	J. David Heller	Pine Bay Landings Developer LLC; WCZ Development LLC	F	86	\$3,100,000	1	Y	N/A	N	Y	Y	15	Y	A	Y	Y	1	Y	Y	24
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One Application proposing a Development located in Polk County that qualifies for the LGAO Goal

none

Additional Applications if necessary to ensure that all counties received a certain number of awards

2027-029C	Berkshire Square	Orange	Jonathan L. Wolf	Berkshire Square Developer, LLC	F	100	\$3,499,000	1	Y	Wendover	Y	N	N	15	Y	A	Y	N	2	Y	Y	3
2027-015C	Residences at Magnolia Place	Polk	Robert Hoskins	NuRock Development Partners Inc.; R Howell Development, LLC; R Block Development, LLC	F	75	\$3,000,000	1	N		N	Y	N	15	Y	B	Y	N	2	Y	Y	2

Additional awards in Hillsborough, Orange, and Palm Beach County

2027-039C	ANR 01	Hillsborough	Daniel Coakley	ANR 01 Developer, LLC	F	90	\$3,500,000	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	12
2027-037C	HP Apt	Orange	Daniel Coakley	HP Apt Developer, LLC	F	94	\$2,630,000	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	20

On September 25, 2026, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion and staff recommendation to select the above Applications for funding and invite the Applicants to enter credit underwriting.

Any Applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., Rule Chapter 28-110, F.A.C., and Rule 67-60.009, F.A.C. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

Exhibit 1



PHONE (850) 425-6654 FAX (850) 425-6694 WEB WWW.RADEYLAW.COM
MAIL POST OFFICE BOX 10967 | TALLAHASSEE, FL 32302 OFFICE 301 SOUTH BRONOUGH ST. | STE. 200 | TALLAHASSEE, FL 32301

September 30, 2026

RECEIVED

SEP 30 2026 8:44 AM

Via Electronic Filing

Corporation Clerk
Florida Housing Finance Corporation
227 North Bronough Street
Suite 5000
Tallahassee, Florida 32301

FLORIDA HOUSING
FINANCE CORPORATION

Re: Notice of Intent to Protest, RFA 2026-202, Proposed Funding Selections

Dear Corporation Clerk:

Pursuant to section 120.57(3), Florida Statutes, rule chapters 28-106 and 28-110, and rule 67-60.009, Florida Administrative Code, Applicant No. 2027-022C, Egret On Union, Ltd., files this Notice of Intent to Protest the proposed funding selections adopted by the Florida Housing Finance Corporation ("FHFC") Board of Directors on September 25, 2026, concerning Request for Applications 2026-202, Housing Credit Financing For Affordable Housing Developments Located In Broward, Duval, Hillsborough, Lee, Orange, Palm Beach, Pinellas, and Polk Counties.

A copy of the Board's Approved Preliminary Awards, as posted on the FHFC website, is attached to this notice as **Exhibit A**. A copy of the Board's Approved Scoring Results, also posted on the FHFC website, is attached as **Exhibit B**. A formal written protest petition will be filed within 10 days of this notice, as required by law.

Sincerely,

Christopher Lunny

Exhibit 2

RFA 2026-202 Board Approved Scoring Results

Application Number	Name of Development	County	Name of Authorized Principal Representative	Developers	Demo	Total Units	HC Funding Amount	Eligible For Funding?	Priority Level	Limited to one Priority 1	Nickname of group of P1 Apps if limit applies	Qualifies for the Geographic Areas of Opportunity / SADDA Goal	Qualifies for the LGAO Designation	Qualifies for the LGAO Goal	Total Points	Dev Cat Funding Preference	Leveraging Classification	Proximity Funding	Permit Ready Application?	Permit Ready Tier Status	Dev Exp Funding Preference	Florida Job Creation Preference	Lottery Number
Eligible Applications																							
2027-001C	Pinnacle Vista	Broward	David O. Deutch	Pinnacle Communities II, LLC	F	90	\$3,750,000	Y	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	41
2027-002C	Pinnacle at Audubon Place	Broward	David O. Deutch	Pinnacle Communities II, LLC	E, Non-ALF	116	\$3,800,000	Y	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	42
2027-003C	Gateway Lofts	Broward	Oscar Sol	Gateway Lofts Dev, LLC	E, Non-ALF	90	\$3,750,000	Y	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	22
2027-005C	Pine Bay Landings	Palm Beach	J. David Heller	Pine Bay Landings Developer LLC; WCZ	F	86	\$3,100,000	Y	1	Y	N/A	N	Y	Y	15	Y	A	Y	Y	1	Y	Y	24
2027-006C	Tamarac Terrace	Broward	Matthew A. Rieger	HTG Tamarac Terrace Developer, LLC	F	90	\$3,799,412	Y	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	26
2027-007C	Pinellas Pointe	Pinellas	J. David Page	Southport Development, Inc., a WA corporation	F	120	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	17
2027-008C	Roma Heights	Pinellas	Scott Macdonald	Blue RH Developer, LLC	F	76	\$2,975,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	34
2027-010C	1600 Building	Broward	Matthew A. Rieger	HTG Meridian Developer, LLC	F	80	\$3,590,000	Y	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	36
2027-011C	Residences at Hollywood	Broward	Robert Hoskins	NuRock Development Partners Inc.; R Howell	F	94	\$3,800,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	13
2027-012C	Residences at Park View	Broward	Robert Hoskins	NuRock Development Partners Inc.; R Howell	F	95	\$3,800,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	15
2027-013C	Ekos Melrose Manors	Broward	Christopher L. Shear	MHP Broward II Developer, LLC	F	120	\$3,800,000	Y	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	7
2027-014C	Ekos Suncoast View	Pinellas	Christopher L. Shear	MHP Suncoast View Developer, LLC	F	110	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	33
2027-015C	Residences at Magnolia Place	Polk	Robert Hoskins	NuRock Development Partners Inc.; R Howell	F	75	\$3,000,000	Y	1	N		N	Y	N	15	Y	B	Y	N	2	Y	Y	2
2027-016C	Blue Tarpon	Pinellas	Scott Macdonald	Blue Tarpon Developer, LLC	F	82	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	25
2027-017C	Residences at Harris Park	Pinellas	Brian Swanton	Gorman & Company, LLC	F	70	\$2,747,500	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	43
2027-018C	Village at Oakland Park	Broward	Mara S. Mades	Cornerstone Group Partners, LLC; Urban	F	90	\$3,800,000	Y	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	38
2027-019C	Altamira	Broward	Mara S. Mades	Cornerstone Group Partners, LLC	F	90	\$3,800,000	Y	1	N		Y	Y	Y	15	Y	A	Y	N	2	Y	Y	6
2027-020C	Mobbly Shores	Hillsborough	Kenneth Naylor	Mobbly Shores Development, LLC	F	159	\$3,500,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	39
2027-021C	Astor Gardens	Duval	Kenneth Naylor	APC Development IV, LLC	F	96	\$3,200,000	Y	1	N		Y	Y	Y	15	Y	A	N	N	2	Y	Y	37
2027-022C	Egret on Union	Pinellas	Kenneth Naylor	Egret on Union Development, LLC; HOP-	F	88	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	4
2027-023C	Pinnacle Manor	Pinellas	David O. Deutch	Pinnacle Communities II, LLC	F	76	\$3,200,000	Y	1	N		Y	N	N	15	Y	B	Y	N	2	Y	Y	11

Exhibit 3

RFA 2026-202 Board Approved Scoring Results

Application Number	Name of Development	County	Name of Authorized Principal Representative	Developers	Demo	Total Units	HC Funding Amount	Eligible For Funding?	Priority Level	Limited to one Priority 1	Nickname of group of P1 Apps if limit applies	Qualifies for the Geographic Areas of Opportunity / SADDAs Goal	Qualifies for the LGAOs Designation	Qualifies for the LGAOs Goal	Total Points	Dev Cat Funding Preference	Leveraging Classification	Proximity Funding	Permit Ready Application?	Permit Ready Tier Status	Dev Exp Funding Preference	Florida Job Creation Preference	Lottery Number
2027-024C	Summerfield Landing	Hillsborough	J. David Page	Southport Development, Inc., a WA corporation	F	130	\$3,500,000	Y	1	N		Y	Y	Y	15	Y	A	N	N	2	Y	Y	19
2027-025C	Washington Commons	Pinellas	Brett Green	Archway Washington Commons Developer, LLC	F	84	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	10
2027-026C	Palm Bluff Commons	Pinellas	Brett Green	Archway Palm Bluff Developer, LLC	F	92	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	27
2027-027C	Skyway Palms	Pinellas	Brett Green	Archway Skyway Palms Developer, LLC	F	80	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	18
2027-029C	Berkshire Square	Orange	Jonathan L. Wolf	Berkshire Square Developer, LLC	F	100	\$3,499,000	Y	1	Y	Wendover	Y	N	N	15	Y	A	Y	N	2	Y	Y	3
2027-030C	Madison Trails	Pinellas	Patrick E. Law	ARD Madison Trails, LLC; New South Residential, LLC	F	90	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	31
2027-031C	Madison Pines	Orange	Patrick E. Law	ARD Madison Pines, LLC; New South Residential, LLC	F	112	\$3,500,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	21
2027-032C	Ekos at Wekiva Springs	Orange	Christopher L. Shear	MHP Wekiva Springs Developer, LLC	F	80	\$2,400,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	28
2027-033C	Benschley Manor	Orange	N. Dwayne Gray	Benschley Manor Developer, LLC	E, Non-ALF	100	\$3,499,000	Y	1	Y	Wendover	N	N	N	15	Y	A	Y	N	2	Y	Y	16
2027-034C	District Lofts	Orange	Matthew A. Rieger	HTG Harmony Developer, LLC	F	88	\$3,499,412	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	32
2027-035C	Trailside Estates I	Pinellas	Nikul A. Inamdar	Sage Pointe Developer, LLC	F	94	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	29
2027-036C	New Life Seniors	Orange	Saki S. Middleton	John Stanley Florida Inc.; New Life Ministries of Orlando, Inc.	E, Non-ALF	85	\$2,970,074	Y	1	Y	N/A	N	N	N	15	Y	A	Y	N	2	N	Y	9
2027-037C	HP Apt	Orange	Daniel Coakley	HP Apt Developer, LLC	F	94	\$2,630,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	20
2027-039C	ANR 01	Hillsborough	Daniel Coakley	ANR 01 Developer, LLC	F	90	\$3,500,000	Y	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	12
2027-040C	Mills Creek	Pinellas	Joseph J. Chambers	HP Capital Mills Development, LLC; Calston Mills Developer, LLC; HOP - Targeted Opportunities in Time, Inc.	F	78	\$2,100,000	Y	1	N		Y	N	N	15	Y	A	Y	Y	1	Y	Y	30

RFA 2026-202 Board Approved Scoring Results

Application Number	Name of Development	County	Name of Authorized Principal Representative	Developers	Demo	Total Units	HC Funding Amount	Eligible For Funding?	Priority Level	Limited to one Priority 1	Nickname of group of P1 Apps if limit applies	Qualifies for the Geographic Areas of Opportunity / SADDAs Goal	Qualifies for the LGAO Designation	Qualifies for the LGAO Goal	Total Points	Dev Cat Funding Preference	Leveraging Classification	Proximity Funding	Permit Ready Application?	Permit Ready Tier Status	Dev Exp Funding Preference	Florida Job Creation Preference	Lottery Number
2027-041C	Monroe Crossings	Pinellas	Joseph J. Chambers	HP Capital Monroe Development, LLC; Calston Monroe Developer, LLC; HOP-Targeted Opportunities in Time, LLC	F	128	\$3,200,000	Y	1	N		Y	N	N	15	Y	A	Y	Y	2	Y	Y	1
2027-043C	RPV Parcel E1	Hillsborough	Daniel Coakley	RPV Parcel E1 Developer, LLC	E, Non-ALF	100	\$3,500,000	Y	1	N		N	N	N	15	Y	A	Y	N	2	Y	Y	44

Ineligible Applications

2027-004C	Roseland Gardens Phase II	Palm Beach	Darren Smith	SHAG Roseland Gardens Phase II Developer, LLC; Magnolia Affordable Development, Inc.	F	100	\$3,500,000	N	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	35
2027-009C	Grove Manor Phase III	Polk	Darren Smith	SHAG Grove Manor Phase III Developer, LLC; LWHA Development, LLC	F	82	\$3,000,000	N	1	N		N	Y	Y	15	Y	A	Y	N	2	Y	Y	5
2027-028C	Liberty Landing	Hillsborough	Michael Ruane	Heartland Development Group LLC; CORE Liberty Landing Developer LLC	F	80	\$2,950,000	N	1	N		Y	N	N	15	Y	A	Y	N	2	Y	Y	40
2027-038C	Destiny Place	Polk	Scott Macdonald	Blue DP Developer, LLC ; Trinity Developer, LLC	F	96	\$3,000,000	N	1	N		N	N	N	10	Y	A	N	Y	1	Y	Y	23
2027-042C	Fern Grove Phase Three	Orange	Scott Zimmerman	BDG Fern Grove Phase Three Developer, LLC	E, Non-ALF	129	\$3,500,000	N	1	N		N	N	N	15	Y	A	Y	Y	1	Y	Y	14
2027-075C*	Villas of Clear Lake	Orange	Eddy Moratin	New Affordable Housing Partners, LLC; Lift Orlando Community Development, LLC	E, Non-ALF	100	\$3,500,000	N	1	N		N	Y	Y	15	Y	A	N	N	2	Y	Y	8

*Due to an internal numbering issue, this Application was not assigned a sequential number and was instead assigned #2027-075C.

On September 25, 2026, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion to adopt the scoring results above.

Any Applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., Rule Chapter 28-110, F.A.C., and Rule 67-60.009, F.A.C. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

Principal Disclosures for the Applicant

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the Applicant entity:

The Applicant is a: Limited Liability Company

Provide the name of the Applicant Limited Liability Company:

Mills Creek PC, LLC

First Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for the Applicant](#)

First Level Entity #	Select Type of Principal of Applicant	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Investor Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
2.	<u>Non-Investor Member</u>	<u>HP Capital Mills Apartments, LLC</u>	<u>Limited Liability Company</u>
3.	<u>Non-Investor Member</u>	<u>Calston Mills, LLC</u>	<u>Limited Liability Company</u>
4.	<u>Non-Investor Member</u>	<u>Housing Opportunities of Pinellas, Inc.</u>	<u>Non-Profit Corporation</u>
5.	<u>Manager</u>	<u>HP Capital Mills Apartments, LLC</u>	<u>Limited Liability Company</u>
6.	<u>Manager</u>	<u>Calston Mills, LLC</u>	<u>Limited Liability Company</u>
7.	<u>Manager</u>	<u>Housing Opportunities of Pinellas, Inc.</u>	<u>Non-Profit Corporation</u>
8.	<u><Select an option></u>	<u>Housing Opportunities of Pinellas, Inc. is an instrumentality</u>	<u><Select an option></u>
9.	<u><Select an option></u>	<u>of the Pinellas County Housing Authority</u>	<u><Select an option></u>

Second Principal Disclosure Level:

Mills Creek PC, LLC

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for the Applicant](#)

Select the corresponding First
Level Principal Entity # from
above for which the Second
Level Principal is being
identified

Select the type of Principal
being associated with the
corresponding First Level
Principal Entity

Select organizational structure
of Second Level Principal
identified

Second Level Entity #		Enter Name of Second Level Principal	
2. <u>(HP Capital Mills Apartments, LLC)</u>	2.A. <u>Managing Member</u>	<u>Hemmer, Frederick</u>	<u>Natural Person</u>
2. <u>(HP Capital Mills Apartments, LLC)</u>	2.B. <u>Managing Member</u>	<u>Hansen, Nicholas</u>	<u>Natural Person</u>
5. <u>(HP Capital Mills Apartments, LLC)</u>	5.A. <u>Managing Member</u>	<u>Hemmer, Frederick</u>	<u>Natural Person</u>
5. <u>(HP Capital Mills Apartments, LLC)</u>	5.B. <u>Managing Member</u>	<u>Hansen, Nicholas</u>	<u>Natural Person</u>
3. <u>(Calston Mills, LLC)</u>	3.A. <u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
6. <u>(Calston Mills, LLC)</u>	6.A. <u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
4. <u>(Housing Opportunities of Pinelli)</u>	4.A. <u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
4. <u>(Housing Opportunities of Pinelli)</u>	4.B. <u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
4. <u>(Housing Opportunities of Pinelli)</u>	4.C. <u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
4. <u>(Housing Opportunities of Pinelli)</u>	4.D. <u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
4. <u>(Housing Opportunities of Pinelli)</u>	4.E. <u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>
7. <u>(Housing Opportunities of Pinelli)</u>	7.A. <u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
7. <u>(Housing Opportunities of Pinelli)</u>	7.B. <u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
7. <u>(Housing Opportunities of Pinelli)</u>	7.C. <u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
7. <u>(Housing Opportunities of Pinelli)</u>	7.D. <u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
7. <u>(Housing Opportunities of Pinelli)</u>	7.E. <u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>

Exhibit 4

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

How many Developers are part of this Application structure? (Please complete the Principal Disclosures for each of the three Co-Developers below.)

Select the organizational structure for the first Co-Developer entity:

The first Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

HP Capital Mills Development, LLC

First Principal Disclosure Level:

HP Capital Mills Development, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Managing Member</u>	<u>Hemmer, Frederick</u>	<u>Natural Person</u>
2.	<u>Managing Member</u>	<u>Hansen, Nicholas</u>	<u>Natural Person</u>

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the second Co-Developer entity:

The second Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

Calston Mills Developer, LLC

First Principal Disclosure Level:

Calston Mills Developer, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the third Co-Developer entity:
The third Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:
HOP- Targeted Opportunities in Time, LLC

First Principal Disclosure Level: HOP- Targeted Opportunities in Time, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Sole Member</u>	<u>Housing Opportunities of Pinellas, Inc</u>	<u>Non-Profit Corporation</u>
2.	<u><Select an option></u>	<u>Housing Opportunities of Pinellas, Inc. is an instrumentality</u>	<u><Select an option></u>
3.	<u><Select an option></u>	<u>of the Pinellas County Housing Authority</u>	<u><Select an option></u>

Second Principal Disclosure Level: HOP- Targeted Opportunities in Time, LLC

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for a Developer](#)

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being	Second Level Entity #	Select the type of Principal being associated with the corresponding First Level Principal Entity	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal identified
<u>1. (Housing Opportunities of Pinell;</u>	1.A.	<u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinell;</u>	1.B.	<u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinell;</u>	1.C.	<u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinell;</u>	1.D.	<u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinell;</u>	1.E.	<u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>

**Electronic Articles of Organization
For
Florida Limited Liability Company**

**L26000397300
FILED 8:00 AM
July 27, 2026
Sec. Of State
fjeggleston**

Article I

The name of the Limited Liability Company is:
MILLS CREEK PC, LLC

Article II

The street address of the principal office of the Limited Liability Company is:
5852 DORA DRIVE
MOUNT DORA, FL. US 32757

The mailing address of the Limited Liability Company is:
5852 DORA DRIVE
MOUNT DORA, FL. US 32757

Article III

The name and Florida street address of the registered agent is:
JOSEPH J CHAMBERS
5852 DORA DRIVE
MOUNT DORA, FL. 32757

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: JOSEPH CHAMBERS

Article IV

The name and address of person(s) authorized to manage LLC:

Title: MGR
HP CAPITAL MILLS APARTMENTS, LLC
9800 4TH ST, SUITE 200
ST. PETERSBURG, FL. 33702 US

Title: MGR
PCHA-MILLS GP, LLC
11479 ULMERTON RD
LARGO, FL. 33778 US

Title: MGR
CALSTON MILLS, LLC
5852 DORA DRIVE
MOUNT DORA, FL. 32757 US

L26000397300
FILED 8:00 AM
July 27, 2026
Sec. Of State
fjeggleston

Article V

The effective date for this Limited Liability Company shall be:

07/27/2026

Signature of member or an authorized representative

Electronic Signature: JOSEPH CHAMBERS

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

LA6000384776

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

☐ PICK-UP

☐ WAIT

☐ MAIL

(Business Entity Name)

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Thank you!

COVER LETTER

**TO: New Filing Section
Division of Corporations**

SUBJECT: PCHA-Mills GP, LLC
Name of Limited Liability Company

The enclosed Articles of Organization and fee(s) are submitted for filing.

Please return all correspondence concerning this matter to the following:

Michael H. Syme

Name of Person

Fox Rothschild LLP

Firm/Company

Six PPG Place, Suite 1000

Address

Pittsburgh, PA 15222

City/State and Zip Code

nbrickfield@pinellashousing.com

E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

Neil Brickfield

727

443-7684

at (

Name of Person

Area Code

Daytime Telephone Number

Enclosed is a check for the following amount:

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☐ \$130.00 Filing Fee &
Certificate of Status

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(additional copy is enclosed)

Mailing Address

New Filing Section
Division of Corporations
P.O. Box 6327
Tallahassee, FL 32314

Street Address

New Filing Section Division
The Centre of Tallahassee
2415 N. Monroe Street, Suite 810
Tallahassee, FL 32303

ARTICLES OF ORGANIZATION FOR FLORIDA LIMITED LIABILITY COMPANY

ARTICLE I - Name:

The name of the Limited Liability Company is:

PCHA-Mills GP, LLC

(Must contain the words "Limited Liability Company," "L.L.C.," or "LLC.")

ARTICLE II - Address:

The mailing address and street address of the principal office of the Limited Liability Company is:

Principal Office Address:

Mailing Address:

11479 Ulmerton Rd.

Largo, FL 33778

11479 Ulmerton Rd.

Largo, FL 33778

ARTICLE III - Registered Agent, Registered Office, & Registered Agent's Signature:

(The Limited Liability Company cannot serve as its own Registered Agent. You must designate an individual or another business entity with an active Florida registration.)

The name and the Florida street address of the registered agent are:

Neil Brickfield

Name

11479 Ulmerton Rd.

Florida street address (P.O. Box **NOT** acceptable)

Largo

FL

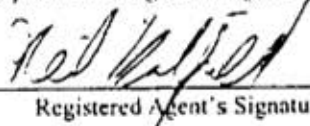
33778

City

State

Zip

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 605, F.S.



Registered Agent's Signature (REQUIRED)

(CONTINUED)

ARTICLE IV-

The name and address of each person authorized to manage and control the Limited Liability Company:

Title:

"AMBR" = Authorized Member

"MGR" = Manager

Name and Address:

AMBR

Housing Opportunities of Pinellas, Inc.

11479 Ulmerton Rd.

Largo, FL 33778

(Use attachment if necessary)

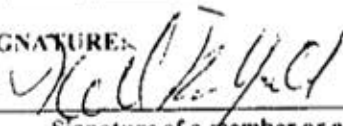
ARTICLE V: Effective date, if other than the date of filing: _____ (OPTIONAL)

(If an effective date is listed, the date must be specific and cannot be more than five business days prior to or 90 days after the date of filing.)

Note: If the date inserted in this block does not meet the applicable statutory filing requirements, this date will not be listed as the document's effective date on the Department of State's records.

ARTICLE VI: Other provisions, if any.

REQUIRED SIGNATURE:



Signature of a member or an authorized representative of a member.

This document is executed in accordance with section 605.0203 (1) (b), Florida Statutes. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

Neil Brickfield

Typed or printed name of signee

Filing Fees:

\$125.00 Filing Fee for Articles of Organization and Designation of Registered Agent

\$ 30.00 Certified Copy (Optional)

\$ 5.00 Certificate of Status (Optional)

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,
ORANGE, PALM BEACH, PINELLAS, AND POLK COUNTIES

Unless stated otherwise, all information requested pertains to the Development proposed in this Application upon completion. The effective date of this Exhibit A is 07/27/2026.

Section 4.A.1.
Review of Attachments

Provide all attachments as required pursuant to the RFA. If it is determined that the Attachments do not meet the RFA requirements or the Applicant submitted materially incorrect information in the Application, the Corporation may take any or all of the following actions, even if the Application was not selected for funding, was deemed ineligible, or was withdrawn: deem the Application ineligible, rescind the award, and consider all Principals of the Applicant to have made a material misrepresentation subject to Section 420.518, F.S.

Section 4.A.2
Demographic Commitment

a. Demographic Commitment

State the Demographic Commitment.

Family

Section 4.A.3
Applicant, Developer, Management Company and Contact Person

a. Applicant

(1) (a) Name of Applicant: Mills Creek PC, LLC

(2) Provide the required documentation to demonstrate that the Applicant is a legally formed entity qualified to do business in the state of Florida as of the Application Deadline as **Attachment 1**.

(3) Non-Profit Applicant Qualifications

Does the Applicant or the General Partner or managing member of the Applicant meet the definition of Non-Profit as set forth in Rule Chapter 67-48, F.A.C. and wish to apply as a Non-Profit Application?

Yes

If "Yes", provide the required information for the Non-Profit entity, as detailed in the RFA, during credit underwriting.

b. Developer Information

(1) Name of each Developer (including all co-Developers, one per line)

HP Capital Mills Development, LLC
Calston Mills Developer, LLC
HOP - Targeted Opportunities in Time, Inc.

(2) For each Developer entity listed in question (1) above (that is not a natural person, Local Government, or Public Housing Authority), provide, as **Attachment 3**, the required documentation demonstrating that the Developer is a legally formed entity qualified to do business in the state of Florida as of the Application Deadline.

(3) Developer Experience

(a) Required Developer Experience

At least one Developer entity named in (1) above must meet the Developer experience outlined in Section Four of the RFA.

Name of the natural person Principal with the required experience: Joseph J. Chambers



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HOP-Targeted Opportunitie

[Search](#)

Entity Name List

Corporate Name	Document Number	Status
HOP - TARGETED OPPORTUNITIES IN TIME, LLC	L25000150657	Active
HOPTECH LLC	L21000313926	INACT
HOP THANH, LLC	L20000015867	Active
HOPTHRU, INC.	F21000001502	INACT
HOPTHRU, INC.	W21000036980	Active
HOP TIL YOU DROP LLC	L20000327717	INACT/UA
HOP 'TIL YOU SHOP, INC.	P06000011307	INACT
HOPTIMISTIC BREWS, LLC	L13000136810	InActive
HOPTINGER, LLC	L14000083105	Active
HOP TO ELECTRIC INC	P22000043829	InActive
HOP TO GO LLC	L11000095939	INACT
HOPTOI MAHJONG LLC	L25000309330	Active
HOP TO IT LLC	L19000068003	INACT
HOP TO IT, INC.	P08000041035	INACT
HOP TO IT CLEANING, LLC	L23000352502	INACT
HOP TO IT ELDERLY CARE LLC	L25000111600	INACT/UA
HOP TO IT HANDYMAN LLC	L25000168885	Active
HOP TO IT HOUSEKEEPING, LLC	L21000227520	Active
HOP TO IT INFLATABLES, LLC	L23000008627	INACT
HOP-TO-IT LAWN CARE INC	P08000098683	INACT

[Next List](#)

Opportunities in Time, Inc.

[Search](#)

State of Florida

Department of State

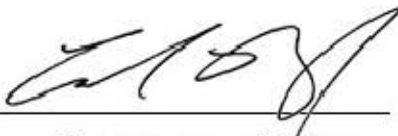
I certify from the records of this office that HOP - TARGETED OPPORTUNITIES IN TIME, LLC is a limited liability company organized under the laws of the State of Florida, filed on April 7, 2025.

The document number of this limited liability company is L25000150657.

I further certify that said limited liability company has paid all fees and penalties due this office through December 31, 2026, that its most recent annual report was filed on June 12, 2026, and that its status is active.

*Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capital, this
the Tenth day of August, 2026*




Secretary of State

Tracking Number: 3428725315CU

To authenticate this certificate, visit the following site, enter this number, and then follow the instructions displayed.

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BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION

HTG ASTORIA, Ltd.

Petitioner,

vs.

FLORIDA HOUSING
FINANCE CORPORATION.

Respondent.

FHFC Case No: ~~2020~~ 2021-006BP

RFA No. 2020-205

App. No. 2021-197BSN

RECEIVED

FEB 8 2021 11:57AM

FLORIDA HOUSING
FINANCE CORPORATION

FORMAL WRITTEN PROTEST AND PETITION
FOR ADMINISTRATIVE HEARING

Petitioner, HTG Astoria, Ltd., ("Petitioner" or "HTG Astoria"), 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 2020-205 Sail Financing of Affordable Multifamily Housing Developments to be Used in Conjunction with Tax-Exempt Bonds and Non-Competitive Housing Credits*. (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 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 October 15, 2020 Florida Housing issued the RFA.

5. On November 3, 2020 and again on November 9, 2020, the RFA was modified by Florida Housing.

6. Applications in response to the RFA were due on or before November 12, 2020.

7. Florida Housing received 90 applications in response to the RFA. Petitioner, applied in response to the RFA, requesting an allocation of \$6,000,000 in Sail Funding for its proposed one-hundred and twenty (120) unit affordable housing development in Manatee County, Florida. Petitioner's application satisfied all the required elements of the RFA and is eligible for a funding award.

8. Petitioner received notice of the preliminary RFA scoring and rankings through electronic posting on Friday, January 22, 2021 at 2:55 pm. A copy of the notices posted on the Corporations website are attached hereto as Exhibit "A". Petitioner was deemed eligible for funding but was not among those recommended for funding.

9. On Wednesday, January 27, 2021 at 12:31 pm., 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.

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.

12. Florida Housing administers a competitive solicitation process to make and service mortgage loans for new construction or rehabilitation of affordable rental units under the State Apartment Incentive Loan (SAIL) Program and the Elderly Housing Community Loan (EHCL) Program.. See Chapter 67-60, Fla. Admin. Code.

RFA 2020-205

13. Through the RFA process Florida Housing anticipated awarding an estimated \$88,959,045 of SAIL funding for proposed Developments in Small, Medium and Large Counties as defined by the RFA. (RFA at 23)

14. Appointed Review Committee members independently evaluated and scored their assigned portions of the submitted applications based on various mandatory and scored items. (RFA at 97) The maximum point total that an applicant can receive is 25 points. (RFA at 90) Failure to meet all eligibility items results in an application being deemed ineligible. (RFA at 85)

15. The RFA provides the following funding goals,

- Two Elderly, New Construction Applications located in a Large County, with a preference for at least one Application that qualifies for the Veterans Preference.
- Three Family, New Construction Applications located in a Large County with a preference that at least two Applications are from Self-Sourced Applicants.
- One Elderly, New Construction, Application located in a Medium County, with a preference for Applications that qualify for the Veteran Preference.
- Two Family, New Construction, Application located in a Medium County, with a preference that at least one Application is from a Self-Sourced Applicant.

(RFA at 92)

16. The RFA provides that the highest scoring Applications will be determined by first sorting together all eligible Applications from highest score to lowest score, with any scores that are tied separated in the following order:

- a. By the Application's eligibility for the Per Unit Construction Funding Preference (which is outlined in Section Four A.11.d of the RFA) with Applications that qualify for the preference listed above Applications that do not qualify for the preference.
- b. Next, by the Application's Leveraging Level number (which is outlined in item 3. of Exhibit C) with Applications that have a lower Leveraging Level number listed above Applications that have a higher Leveraging Level number.
- c. 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.
- d. By the Application's eligibility for the Grocery Store Funding Preference (which is outlined in Section Four A. 5. e. of the RFA) with Applications that qualify for the preference listed above that do not qualify for the preference);
- e. Next, by the Application's eligibility for the Community Service 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);

- f. 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. By lottery number, resulting in the lowest lottery number receiving preference.

(RFA at 93)

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

a. Goal to fund seven Medium and Large County, New Construction Applications

- (1) Goal to fund one New Construction Application located in Miami-Dade County and one New Construction Application located in Broward County.

(a) First Application

The first Application selected for funding will be the highest ranking eligible New Construction Application that is located in Miami-Dade County or Broward County, regardless of the Demographic Commitment, the Application's qualifications for the Veterans Preference, or the Applicants' status as a Self-Sourced Applicant or Non-Self-Sourced Applicant.

(b) Second Application

- If the first Application selected for funding was an Elderly Application located in Miami-Dade County, the second Application will be the highest-ranking Family Application located in Broward County, with a preference that it be a Self-Sourced Applicant located in Broward County.
- If the first Application selected for funding was an Elderly Application located in Broward County, the second Application will be the highest-ranking Family Application located in Miami-Dade County, with a preference that it be a Self-Sourced Application located in Miami-Dade County.

- If the first Application selected for funding was a Family Application located in Miami-Dade County, the second Application will be the highest- ranking Application located in Broward County that either (i) is an Elderly Application that qualifies for the Veterans Preference; or (ii) is a Family Application that qualifies as a Self - Sourced Application. If there are no eligible Elderly Applications that qualifies for the Veterans Preference or Family Application that qualifies as a Self-Sourced Applications located in Broward County, then the second Applications selected for funding will be the highest-ranking Application located in Broward County, regardless of the Demographic Commitment, the Applicant's qualifications for the Veterans Preference, or the Applicants' status as a Self-Sourced Applicant or Non-Self-Sourced Applicant.
- If the first Application selected for funding was a Family Application located in Broward County, the second Application will be the highest- ranking Application located in Miami-Dade County that either (i) is an Elderly Application that qualifies for the Veterans Preference; or (ii) is a Family Application that qualifies as a Self - Sourced Application. If there are no Elderly Applications that qualifies for the Veterans Preference or Family Application that qualifies as a Self-Sourced Applications located in Miami-Dade County, then the second Applications selected for funding will be the highest-ranking Application located in Miami-Dade County, regardless of the Demographic Commitment, the Applicant's qualifications for the Veterans Preference, or the Applicants' status as a Self-Sourced Applicant or Non-Self-Sourced Applicant.

(2) Goal to fund two Elderly, Large County, New Construction Applications

This goal will be met under the following circumstances:

- (a) If neither of the Applications selected to meet the goal described in (1) above are Elderly Applications, the two highest-ranking eligible Elderly, Large County, New Construction Applications that meets the Veterans Preference will be selected for funding, subject to the County Award Tally and both Funding Tests. If the Goal could not be met because there were not enough eligible Applications that meets the Veterans Preference and this goal, the two highest-ranking eligible Elderly, Large County, New Construction Applications will be selected for funding, subject to the County Award Tally and both Funding Tests.
- (b) If one of the Applications selected to meet the goal described in (1) above is an Elderly Applications, the highest-ranking eligible Elderly, Large County, New Construction Applications that meets the Veterans

Preference will be selected for funding, subject to the County Award Tally and both Funding Tests. If the goal could not be met because there were no eligible unfunded Elderly, Large County, New Construction Applications that meets the Veterans Preference, the highest-ranking eligible Elderly, Large County, New Construction Application will be selected for funding, subject to the County Award Tally and both Funding Tests.

(3) Goal to Fund Three Family, Large County, new Construction Applications

This goal will be met under the following circumstances:

(a) If one or both of the Applications selected to meet the goal described in (1) above is a Family Application, that Application(s) will count towards this goal. To meet this goal, the highest-ranking Family, Large County, New Construction Self-Sourced Application(s) will be selected, subject to the County Award Tally and both Funding Tests, until this goal is met. If the goal could not be met because there were not enough eligible unfunded Self-Sourced Applications that could meet this goal, then the highest-ranking Family, Large County, new Construction Non-Self-Sourced Application(s) will be selected, subject to the County Award Tally and both Funding Tests, until this goal is met.

(4) Goal to Fund one Elderly, Medium County, New Construction Application

The Application selected for funding will be the highest-ranking eligible Elderly, Medium County, New Construction Application that meets the Veterans Preference, subject to the Funding Tests. If the goal could not be met because there were no eligible unfunded Elderly, Medium County, New Construction Applications that meets the Veterans Preference, the highest-ranking eligible Elderly, Medium County, New Construction Application will be selected for funding, subject to the Funding Tests.

(5) Goal to Fund two Family, Medium County, New Construction Applications

The first Application selected for funding will be the highest-ranking eligible Family, Medium County, New Construction Application from a Self-Sourced Applicant, subject to the County Award Tally and Funding Tests.

After the selection of the Application from a Self-Sourced Applicant or if there are no Applications from a Self-Sourced Applicant that can meet this goal, the additional Application(s) selected to meet this goal, will be the

highest-ranking Family, Medium County, New Construction Application(s), regardless of whether the Application(s) is from a Self-Sourced Applicant, subject to the County Award Tally and both Funding Tests.

b. Family or Elderly (ALF or Non-ALF) Small County Applications

The highest ranking eligible unfunded Family or Elderly (ALF or Non-ALF) Small County Applications, regardless of the Development Category, the Application's qualifications for the Veterans Preference, or the Applicants' status as a Self-Sourced Applicant or Non-Self-Sourced Applicant, will be selected for funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally.

If funding remains and none of the eligible unfunded Small County Applications can meet both of the Funding Tests, or if there are no eligible unfunded Small County Applications, the remaining Small County Geographic funding will be allocated to the Medium County Geographic Category and to the Large County Geographic Category on a pro-rata basis based on the geographic distribution adjusted to meet the requirements of Section 420.5087, F.S.

c. Family or Elderly (ALF or Non-ALF) Medium County Applications

(1) Self-Sourced Applications

First, the highest ranking eligible unfunded Family Medium County Self-Sourced Applications will be selected for funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally. If funding remains and none of the eligible unfunded Family Medium County Self-Sourced Applications can meet both of the Funding Tests, no further Family Medium County Self-Sourced Applications will be selected for funding.

(2) One Application that meet the Veterans Preference

Next, the highest ranking eligible unfunded Elderly Medium County Application that meet the Veterans Preference will be selected for funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally.

(3) Remaining Medium County Funding

If funding remains, the highest ranking eligible unfunded Family or Elderly (ALF or Non-ALF) Medium County Applications, regardless of the Development Category, will be selected for

funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally. If none of the eligible unfunded Medium County Applications can meet both of the Funding Tests, or if there are no eligible unfunded Medium County Applications, the remaining Medium County Geographic funding will be allocated to the Large County Geographic Category.

d. Family or Elderly (ALF or Non-ALF) Large County Applications

(1) Self-Sourced Applications

First, the highest ranking eligible unfunded Family Large County Self-Sourced Applications will be selected for funding, subject to the Geographic and Demographic Funding Tests and County Award Tally.

If funding remains and none of the eligible unfunded Family Large County Self Sourced Applications can meet both Funding Tests, all remaining Self-Sourced Applicant Family Funding and Non-Self-Sourced Applicant Family Funding will be merged ("Family Funding Merge"). No further Self-Sourced Applications will be funded.

(2) One Application that meets the Veterans Preference

Next, the highest ranking eligible unfunded Elderly Large County Application that meet the Veterans Preference will be selected for funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally.

(3) Remaining Large County Funding

If funding remains, the highest ranking eligible unfunded Family or Elderly (ALF or Non-ALF) Large County Applications, regardless of the Development Category, will be selected for funding, subject to the Geographic and Demographic Funding Tests and the County Award Tally.

If funding remains and no eligible unfunded Large County Applications can meet the Funding Tests, then no further Applications will be selected for funding and the remaining funding will be distributed as approved by the Board.

(RFA at p.93-96)

18. The following applications were selected in the following order for funding by the Review Committee:

2021-221S-POAH Cutler Manor II, LLC (Large County/Miami-Dade/Family)
2021-199BSN- University Station II Ltd. (Large County/Broward/Family)
2021-216 Quiet Meadows, Ltd (Large County/Palm Beach/Elderly)
2021-252SN-Fulham Terrace (Large County/Hillsborough/Elderly)
2021-244BS-Princeton Crossings LLC (Large County/Miami-Dade/Family)
2021-246BS-MHP FLVII, LLLP (Medium County/Collier /Elderly)
2021-258S-Nathan Ridge, Ltd (Medium/Clay County/Family)
2021-222BS-St. Peter Claver Place, Ltd (Medium County/Lee/Elderly)
2021-209BS -Sweetwater Apartments. (Small County/Columbia)
2021-251BS- RST The Willows, LP (Medium County/Saint Lucie)
2021-206BS- BDG Rosewood Pointe, LLC (Medium County/Osceola)
2021-255SN-Somerset Landings Ltd. (MediumCounty/PalmBeach)
2021-245BS-StadiumTowers (Large County/Miami-Dade)
2021-203BSN-BDG Fern Grove, LP (Large County/Orange))
2021-212BSN-Tallman Pines Phase I (Large County/Broward)
2021-269SN- Southwick Commons Ltd. (Large County/Orange)
2021-225S-Island Cove, LLC (Large County/Palm Beach)

HTG Astoria, Application 2021-197BSN, in Manatee County was deemed eligible but unfunded. The scoring committee erroneously found RST The Willows (the "Willows") eligible for funding. If the Willows had been properly deemed ineligible then HTG Astoria would have been selected for funding under the "Family or Elderly (ALF or Non-ALF) Medium County Applications" as the highest ranking eligible unfunded Elderly Medium County Application that meets the Veterans Preference, subject to the Geographic and Demographic Funding Tests and the County Award Tally.

The Willows
Principal Disclosure Form

19. The RFA provides as follows,

“to meet eligibility requirements, the Principals Disclosure Form must identify pursuant to subsections 67-48.002(94) ...F.A.C., the Principals of the Applicant and Developer(s) as of the Application Deadline. A Principals Disclosure Form should not include, for any organizational structure, any type of entity that is not specifically included in the Rule definition of Principal.

(RFA at 15)

20. The Applicant on their *Principal Disclosures for the Developer Form* identified the Developer as Roundstone Development, LLC. Pursuant to Rule 67-48.002(94),

(94) “Principal” means

(c) For a limited liability company, each manager and each member of the limited liability company.

21. At the Second Principal Disclosure level, the Applicant disclosed two member entities that are limited liability companies, Realty Advisors, LLC and Southmark RST, LLC. A true and correct copy of the Principal Disclosure for the Developer Form is attached hereto as Exhibit C.

22. At the Third Principal Disclosure level, Realty Advisors, LLC disclosed Realty Advisors, Inc. as the sole Member. Southmark RST, LLC disclosed Southmark Corporation as its sole Member. Neither Realty Advisors, LLC or Southmark RST, LLC disclosed a manager at the Third Principal Disclosure Level.

23. Upon information and belief, Gina H. Hay, is a Manager of Realty Advisors, LLC and was not disclosed by the Applicant entity. A true and correct copy of the Entity Information from the Nevada Corporate website is attached hereto as Exhibit D.

24. The Applicant should be deemed ineligible for failing to disclose managers on the *Principal Disclosure for Developer Form*.

Substantial Interests Affected

25. If the Willows had been properly deemed ineligible, then HTG Astoria would have been selected for funding under the "Family or Elderly (ALF or Non-ALF) Medium County Applications" as the highest ranking eligible unfunded Elderly Medium County Application that meets the Veterans Preference.

26. 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.

27. 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

28. 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 Florida Housing's actions in determining Willows eligible for funding were arbitrary and capricious?
- b. Whether Florida Housing's actions in determining Willows eligible elected for funding were contrary to competition?

- c. Whether Florida Housing's actions in determining Willow eligible for funding were clearly erroneous?
- d. Whether the Willows failed to disclose a Principal of the Developer Entity on the *Principal Disclosure for Developer Form*?
- e. Such, other issues as may be revealed during the protest process.

Statutes and Rules Entitling Relief

29. 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

30. Petitioner participated in the RFA process to compete for an award of SAIL funds based upon the delineated scoring and ranking criteria in the RFA.

31. 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.

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

Right to Amend this Petition

33. 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 applications of RST The Willows, LP should have been deemed ineligible for funding and award funding to HTG Astoria, LTD.
- d) That the Corporation adopt the Recommended Order of the ALJ.

FILED AND SERVED this 8th day of February 2021.



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STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

HTG ASTORIA, LTD,

DOAH Case No. 21-0725BID

Petitioner,

v.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent,

and

RST THE WILLOWS, LP,

Intervenor.

MHP FL VIII LLLP,

DOAH Case No. 21-0726BID

Petitioner,

v.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent,

and

FULHAM TERRACE, LTD., BDG FERN GROVE,
LP, and QUIET MEADOWS, LTD,

Intervenors.

VISTA AT COCONUT PALM, LTD,

DOAH Case No. 21-0727BID

Petitioner,

v.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent,

and

UNIVERSITY STATION I, LLC, RESIDENCES
AT SOMI PARC, LLC, and BDG FERN GROVE, LP,

Intervenors.

_____ /

RST THE WILLOWS, LP'S NOTICE OF FILING PROPOSED EXHIBIT

RST The Willows, LP, ("Willows") hereby gives notice of providing electronic and paper copy of RST The Willows, LP's exhibit to G. W. Chisenhall, Administrative Law Judge on March 26, 2021.

DATED this 26th day of March, 2021.

Respectfully submitted,

/s/ *Michael P. Donaldson*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by E-Mail this
26th day of March 2021 to:

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Betty Zachem, Assistant General Counsel
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/s/ *Michael P. Donaldson*
Attorney

**BEFORE THE STATE OF FLORIDA
FLORIDA DIVISION OF ADMINISTRATIVE HEARINGS**

HTG ASTORIA, LTD.

DOAH CASE NO. 21-0725BID

Petitioner,

vs.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent

and

RST THE WILLOWS, LP,

Intervenor.

MHP FL VIII, LLP,

DOAH CASE NO. 21-0726BID

vs.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent,

and

BDG FERN GROVE, LP,

Intervenor.

VISTA AT COCONUT PALM, LTD,

DOAH CASE NO. 21-0727BID

Petitioner,

vs.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent,

and

UNIVERSITY STATION I, LLC, RESIDENCES
AT SOMI PARC, LLC, AND BDG FERN
GROVE, LP,

Intervenors.

**STIPULATION FOR ENTRY OF FINDINGS OF FACT AND RECOMMENDED
ORDER IN FAVOR OF PETITIONER HTG ASTORIA, LTD**

Pursuant to Section 120.57(4), Florida Statutes, Petitioner, HTG Astoria, Ltd., (“HTG Astoria”), Intervenor, RST The Willows, LP (“RST Willows”), and Respondent, Florida Housing Finance Corporation (“Florida Housing”), hereby stipulate and agree as follows:

1. HTG Astoria (Application #2021-197BSN) and RST Willows (Application #2021-249BS) each submitted applications in Request for Applications 2020-205 SAIL Financing of Affordable Multifamily Housing Developments to be Used in Conjunction with Tax-Exempt Bonds and Non-Competitive Housing Credits (the “RFA”). Each application was scored as having satisfied eligibility requirements for funding. RST’s Application was preliminarily selected for funding and HTG Astoria’s Application was not.

2. HTG Astoria timely filed a Petition for Administrative Hearing challenging the eligibility and selection of RST Willows’ application for funding. In particular, HTG Astoria challenged Florida Housing’s determination that RST Willows satisfied the Principal Disclosure Requirements of the RFA.

AGREEMENT TO RESOLVE DISPUTE

3. As a result of factual information learned by the parties through discovery, the parties, in the interest of avoiding time, expense, and uncertainty of further litigation, agree to the following findings of fact and to resolve this litigation on the following terms:

a. RST Willows agrees to the designation of its application as ineligible for consideration for funding, and hereby waives the right to challenge that designation. RST Willows denies any wrongdoing or intentional misrepresentation, and neither HTG Astoria nor Florida Housing assert any wrongdoing or intentional misrepresentations by RST Willows.

b. Florida Housing agrees that RST Willows is ineligible for funding under RFA 2020-205.

c. Florida Housing agrees that this Stipulation does not constitute the withdrawal of an application by RST Willows, or by its Applicant, Developer, Principals of the Applicant or Developer, affiliate of the Applicant or Developer, or Financial Beneficiary of the Applicant or Developer, and shall not result in any point loss, preference loss, ineligibility determination, penalty, or negative impact of any kind against such entities or individuals in any pending or future Florida Housing program.

d. Florida Housing agrees that neither the submission of RST Willows' application nor this Stipulation shall impact in any way the ability of RST Willows, the Applicant and Developer entities identified in RST Willows' Application, or the Principals of the Applicant or Developer entities from submitting Applications in the future for other RFAs or funding programs and having those Applications considered for funding under the terms of those future RFAs or funding programs.

e. RST Willows agrees that the Application of HTG Astoria is eligible for funding and waives the right to challenge that factual finding and an Order ruling that the Application of HTG Astoria is eligible for funding. At the time of filing this Stipulation, there are no challenges to the eligibility of HTG Astoria and Florida Housing's position is that HTG Astoria is eligible for funding in RFA 2020-205.

f. Consistent with this Stipulation, the parties respectfully request that the Administrative Law Judge enter the following Finding of Fact into a Recommended Order providing that:

- i. the RST Willows application should be deemed ineligible for funding.

4. All parties shall be responsible for their own costs and attorneys' fees incurred in this matter.

RESPECTFULLY SUBMITTED this 22nd day of March, 2021.

/s/ Betty C. Zachem

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by E-Mail this 22nd day of March 2021 to:

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/s/ Michael P. Donaldson
Attorney

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,

Section 4.A.5
Proximity, Mandatory Distance, and RECAP

e. Proximity

(1) PHA or RD 515 Proximity Point Boost

(a) Does the proposed Development qualify for the PHA Proximity Point Boost?

No

If "Yes", provide the required letter as Attachment 5.

(b) Does the proposed Development qualify for the RD 515 Proximity Point Boost?

No

If "Yes", provide the required letter as Attachment 10.

*Subject to verification of other RFA requirements

Points awarded for Proximity Point Boost*
0.0

(2) Transit Services

Applicants may select Private Transportation or provide the location information and distance for one of the remaining four Transit Services on which to base the Application's Transit Score.

(a) If the proposed Development will serve the Elderly (Non-ALF) Demographic Commitment, does the Applicant commit to provide Private Transportation?

(The proposed Development does not qualify to select this option.)

Points awarded for Transit Type
0.0

(a) Other Transit Services

Service	Latitude Coordinates	Longitude Coordinates	Distance*	Points awarded for Transit Type
Public Bus Stop 1	28.126374	-82.759446	0.05	4
Public Bus Stop 2	28.125853	-82.759508	0.08	
Public Bus Stop 3				
Public Bus Transfer Stop				
Public Bus Rapid Transit Stop				
Public Rail Station				

This area intentionally left blank.

(3) Community Services

Up to three Community Services may be selected, for a maximum 4 points for each service.

Service	Service Name	Service Address	Distance*	Points awarded for Community Services
Grocery Store	Aldi	1171 S Pinellas Ave, Tarpon Springs, FL 34689	0.66	3.0
Medical Facility	Advent Health North Pinellas	1395 S Pinellas Ave, Tarpon Springs, FL 34689	0.43	3.5

Exhibit 12

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,

Pharmacy	ORANGE Walgreens Pharmacy	605 S Pinellas Ave, Tarpon Springs, FL 34689	0.98	2.5
Public School				

*Rounded up to the nearest hundredth of a mile. Distance between the coordinates of the Development Location Point and the coordinates of the service. The method used to determine the latitude and longitude coordinates must conform to Rule 5J-17, F.A.C., formerly 61G17-6, F.A.C. All calculations shall be based on "WGS 84" and be grid distances. The horizontal positions shall be collected to meet sub-meter accuracy (no autonomous hand-held GPS units shall be used).

f. **Racially and Ethnically Concentrated Areas of Poverty (RECAP)**
Is any part of the proposed Development located in a RECAP designated area?

No

(1) Does the Application qualify for the Development Subcategory of Redevelopment, with or without Acquisition?

(2) The proposed Development qualifies for the Local Government Areas of Opportunity Designation?

No

Florida Housing has reviewed some of the above information through an automated process and has made the determinations below. Items not specifically addressed by these determination statements are not being automatically reviewed.	
Transit Service Points calculated based on the information entered above:	4
Community Service Points calculated based on the information entered above:	9
PHA or RD Proximity Boost points achieved?	0
Total Proximity Points calculated based on information entered above:	13
• Does the information provided at question 11 indicate that the Application qualifies for the Local Government Area of Opportunity Designation?	No
• Using the information entered above, does the Application meet the minimum Transit Point Requirement?	Yes
• Using the information entered above, does the Application meet the minimum Proximity Point Requirement?	Yes
• Using the information entered above, does the Application meet the Proximity Funding Preference?	Yes
• Total Proximity Points calculated based on information entered above, without the benefit of a PHA Boost:	13

Route JTC — TARPON SPRING / CLEARWATER BEACH

Direction 0 → CLEARWATER BCH TRANSIT CENTER | Mon–Thu | 13 trips

Pattern	trip_id	block	DODECANES E BLVD + SPONGE DOCKS	ORANGE ST & RIDGE RD	BAYSHORE BLVD + CAUSEWAY BLVD	MAIN ST + PINELLAS TRAIL	OSCEOLA AVE AND CLEVELAND ST	GARDEN & PARK STREET	Clearwater Beach Transit Center North
		<i>stop_id</i>	<i>10386</i>	<i>10506</i>	<i>1485</i>	<i>5523</i>	<i>10417</i>	<i>10384</i>	<i>4212</i>
B	2107020	801007	09:06		09:38	09:50	10:04	10:06	10:14
B	3923020	801017	10:06		10:38	10:50	11:04	11:06	11:14
B	5255020	801027	11:06		11:38	11:50	12:04	12:06	12:14
B	2910020	801007	12:06		12:38	12:50	13:04	13:06	13:14
B	2647020	801017	13:06		13:38	13:50	14:04	14:06	14:14
B	2382020	801027	14:06		14:38	14:50	15:04	15:06	15:14
B	6118020	801007	15:06		15:38	15:50	16:04	16:06	16:14
B	1102020	801017	16:06		16:38	16:50	17:04	17:06	17:14
B	3185020	801027	17:06		17:38	17:50	18:04	18:06	18:14
B	5354020	801007	18:06		18:38	18:50	19:04	19:06	19:14
B	681020	801017	19:06		19:38	19:50	20:04	20:06	20:14
B	4844020	801027	20:06		20:38	20:50	21:04	21:06	21:14
D	2713020	801007	20:49		21:21	21:33			

Direction 0 → CLEARWATER BCH TRANSIT CENTER | Fri | 16 trips

Pattern	trip_id	block	DODECANES E BLVD + SPONGE DOCKS	ORANGE ST & RIDGE RD	BAYSHORE BLVD + CAUSEWAY BLVD	MAIN ST + PINELLAS TRAIL	OSCEOLA AVE AND CLEVELAND ST	GARDEN & PARK STREET	Clearwater Beach Transit Center North
		<i>stop_id</i>	<i>10386</i>	<i>10506</i>	<i>1485</i>	<i>5523</i>	<i>10417</i>	<i>10384</i>	<i>4212</i>
B	5402060	801005	09:06		09:38	09:50	10:04	10:06	10:14
B	2183060	801015	10:06		10:38	10:50	11:04	11:06	11:14
B	3300060	801025	11:06		11:38	11:50	12:04	12:06	12:14
B	172060	801005	12:06		12:38	12:50	13:04	13:06	13:14
B	2956060	801015	13:06		13:38	13:50	14:04	14:06	14:14
B	2015060	801025	14:06		14:38	14:50	15:04	15:06	15:14
B	5524060	801005	15:06		15:38	15:50	16:04	16:06	16:14
B	3676060	801015	16:06		16:38	16:50	17:04	17:06	17:14
B	5222060	801025	17:06		17:38	17:50	18:04	18:06	18:14
A	631060	801005	18:06	18:33	18:38	18:50	19:04	19:06	19:14
A	4025060	801015	19:06	19:33	19:38	19:50	20:04	20:06	20:14
A	510060	801025	20:06	20:33	20:38	20:50	21:04	21:06	21:14
A	3730060	801005	21:06	21:33	21:38	21:50	22:04	22:06	22:14
A	5786060	801015	22:06	22:33	22:38	22:50	23:04	23:06	23:14
A	305060	801025	23:06	23:33	23:38	23:50	24:04	24:06	24:14
C	2142060	801005	23:49	24:16	24:21	24:33			

Direction 1 → DUNEDIN DOWNTOWN | Mon–Thu | 15 trips

Pattern	trip_id	block	Clearwater Beach Transit Center North	CLEARWATER R BEACH TRANSIT CENTER	GARDEN & PARK STREET	MAIN ST + PINELLAS TRAIL	BAYSHORE BLVD + 2727	ORANGE ST & RIDGE RD	SAFFORD ST & TARPON AVE	DODECANES E BLVD + SPONGE DOCKS
		<i>stop_id</i>	4212	4214	10384	5547	1369	10505	10387	10386
D	1168020	801007				08:21	08:34:44		09:01	09:06
D	1001020	801017				09:21	09:34:44		10:01	10:06
B	3010020	801027	09:35	09:39	09:48	10:04	10:17:44		10:44	10:49
B	3950020	801007	10:35	10:39	10:48	11:04	11:17:44		11:44	11:49
B	1574020	801017	11:35	11:39	11:48	12:04	12:17:44		12:44	12:49
B	783020	801027	12:35	12:39	12:48	13:04	13:17:44		13:44	13:49
B	4641020	801007	13:35	13:39	13:48	14:04	14:17:44		14:44	14:49
B	5726020	801017	14:35	14:39	14:48	15:04	15:17:44		15:44	15:49
B	2780020	801027	15:35	15:39	15:48	16:04	16:17:44		16:44	16:49
B	3880020	801007	16:35	16:39	16:48	17:04	17:17:44		17:44	17:49
B	6154020	801017	17:35	17:39	17:48	18:04	18:17:44		18:44	18:49
B	5619020	801027	18:35	18:39	18:48	19:04	19:17:44		19:44	19:49
B	4905020	801007	19:35	19:39	19:48	20:04	20:17:44		20:44	20:49
C	3981020	801017	20:14	20:18	20:27					
C	5285020	801027	21:14	21:18	21:27					

Direction 1 → DUNEDIN DOWNTOWN | Fri | 18 trips

Pattern	trip_id	block	Clearwater Beach Transit Center North	CLEARWATER R BEACH TRANSIT CENTER	GARDEN & PARK STREET	MAIN ST + PINELLAS TRAIL	BAYSHORE BLVD + 2727	ORANGE ST & RIDGE RD	SAFFORD ST & TARPON AVE	DODECANES E BLVD + SPONGE DOCKS
		<i>stop_id</i>	4212	4214	10384	5547	1369	10505	10387	10386
D	4095060	801005				08:21	08:34:44		09:01	09:06
D	1675060	801015				09:21	09:34:44		10:01	10:06
B	4718060	801025	09:35	09:39	09:48	10:04	10:17:44		10:44	10:49
B	4560060	801005	10:35	10:39	10:48	11:04	11:17:44		11:44	11:49
B	3531060	801015	11:35	11:39	11:48	12:04	12:17:44		12:44	12:49
B	67060	801025	12:35	12:39	12:48	13:04	13:17:44		13:44	13:49
B	5465060	801005	13:35	13:39	13:48	14:04	14:17:44		14:44	14:49
B	3577060	801015	14:35	14:39	14:48	15:04	15:17:44		15:44	15:49
B	663060	801025	15:35	15:39	15:48	16:04	16:17:44		16:44	16:49
B	5889060	801005	16:35	16:39	16:48	17:04	17:17:44		17:44	17:49
A	2298060	801015	17:35	17:39	17:48	18:04	18:17	18:21	18:30	18:35
A	3969060	801025	18:35	18:39	18:48	19:04	19:17	19:21	19:30	19:35
A	4389060	801005	19:35	19:39	19:48	20:04	20:17	20:21	20:30	20:35
A	2990060	801015	20:35	20:39	20:48	21:04	21:17	21:21	21:30	21:35
A	1389060	801025	21:35	21:39	21:48	22:04	22:17	22:21	22:30	22:35
A	5050060	801005	22:35	22:39	22:48	23:04	23:17	23:21	23:30	23:35
C	5279060	801015	23:14	23:18	23:27					
C	1051060	801025	24:14	24:18	24:27					

From: Walls, Trevor <Trevor.Walls@fdacs.gov>
Sent: Thursday, October 8, 2026 10:50 AM
To: Carine Yhap <cyhap@apcompanies.com>
Subject: FW: Supermarket license status

You don't often get email from trevor.walls@fdacs.gov. [Learn why this is important](#)

Thank you for contacting the Department of Agriculture and Consumer Services' Division of Food Safety. This establishment passed inspection on 8/6/2026. Permit start date is listed as 8/14/2026. See below and attached.

Primary Information

Food Entity #:

451737

Food Entity Name:

Aldi #306

Current C

Type Category:

SUP - Supermarket

FDA FEI:

Type:

111 - Supermarket

Business Conducted:

☒ Retail

☐ Manufactured

Status:

Active

Regulate

More FE Details

Owner

Visits

Products & Processes

Permit Details

Comp

Additional Information

FE

Renewal

Plan Review Complete:

☐ Yes

☒ No

Packages and Sells Ice:

☐ Yes

☒ No

Bottles Water:

☐ Yes

☒ No

Uses Shared Kitchen:

☐ Yes

☒ No

Is Shared Kitchen:

☐ Yes

☒ No

Select if the FE offers any waste food for animal feed:

☐

Sells Fuel:

☐ Yes

☒ No

Backup Generator:

☐ Yes

☒ No

FE sells products (Hemp) pursuant to 581.172, F.S.?

☐ Yes

☒ No

FE sells products (Kratom) pursuant to 500.92, F.S.?

☐ Yes

☒ No

Meets definition of a Food Charity per s. 496.406(2) F.S.:

☐ Small

☐ Large

☒ N/A

Operation and Inspection

Established On:

8/6/2026

FE Hours:

Insp. Frequency:

12

Risk Score:

363

Next Insp.:

Permit Details

Select From the List.

☐	Permit Number	Permit Status	Permit Start Date	Permit Renew By D...	Original Print Date	Last Print Da
☒	2027-N-2271...	Active	8/14/2026 7:56 AM	2/17/2027	8/14/2026 7:58 AM	10/8/2026

Thanks,

Trevor Walls

Government Analyst II
Division of Food Safety
Florida Department of Agriculture and Consumer Services

(850) 245-5415
(850) 488-7946 Fax
Trevor.Walls@FDACS.gov

The Conner Building
3125 Conner Boulevard
Tallahassee, Florida 32399-1650

www.FDACS.gov

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.

From: Carine Yhap <cyhap@apcompanies.com>

Sent: Thursday, October 1, 2026 5:28 PM

To: Food Safety <foodsafety@fdacs.gov>

Subject: Supermarket license status

You don't often get email from cyhap@apcompanies.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Could you please confirm the status of the Supermarket license for Aldi located at 1171 S. Pinellas Avenue, Tarpon Springs, Florida as of August 13, 2026 including:

1. whether the license was active; and
2. the supermarket was authorized to operate at that location on August 13, 2026.

Thank you,

CARINE YHAP | SENIOR VICE PRESIDENT
ATLANTIC | PACIFIC COMPANIES
161 NW 6 ST | SUITE 1020 | MIAMI FL 33136
305.357.4724 | cyhap@apcompanies.com



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WILTON SIMPSON
COMMISSIONER

Florida Department of Agriculture and Consumer Services
Division of Food Safety

ANNUAL FOOD PERMIT

Chapter 500, Florida Statutes (F.S.)
Rule Chapter 5K-4.020 Florida Administrative Code (F.A.C.)
1-800-HELP-FLA (435-7352) | www.FDACS.gov

October 08, 2026



Aldi (Florida) LLC
2651 State Road 17 S
Haines City, FL 33844 - 1503

PERMIT TYPE: 111
PERMIT NUMBER: 2027-N-2271588
FOOD ENTITY NUMBER: 451737

PERMITTED LOCATION ADDRESS:
Aldi #306
1171 S Pinellas Ave
Tarpon Springs, FL 34689 - 3717

The attached permit must be renewed by February 17, 2027.

This annual food permit must be displayed in a conspicuous location at the permitted location. Failure to conspicuously display the permit may result in administrative action for violation of 5K-4.020, F.A.C.

This permit shall be renewed annually. A late fee of \$100 will be imposed if the renewal fee for this food establishment is received after the renewal date. In accordance with Chapter 500, F.S., failure to renew or an incomplete renewal may subject the food establishment to administrative fines not to exceed \$5,000 and/or permit suspension. Rule 5K-4.020(7), F.A.C., requires food establishments to notify the department within 30 days of closing or dissolution. Visit <https://foodpermit.fdacs.gov> to renew or dissolve this permit.

THIS FOOD PERMIT IS NOT TRANSFERABLE

FDACS-14414 Rev. 03/26



WILTON SIMPSON
COMMISSIONER

Florida Department of Agriculture and Consumer Services
Division of Food Safety

ANNUAL FOOD PERMIT

Chapter 500, Florida Statutes (F.S.)
Rule Chapter 5K-4.020 Florida Administrative Code (F.A.C.)
1-800-HELP-FLA (435-7352) | www.FDACS.gov

RENEW BY:
February 17, 2027

PERMIT TYPE: 111
FOOD ENTITY NUMBER: 451737

LOCATION:
Aldi #306
1171 S Pinellas Ave
Tarpon Springs, FL 34689 - 3717

OWNER:
Aldi (Florida) LLC
2651 State Road 17 S
Haines City, FL 33844 - 1503

This annual food permit must be displayed in a conspicuous location at the permitted location. Failure to conspicuously display the permit may result in administrative action for violation of 5K-4.020, F.A.C.

This permit shall be renewed annually. A late fee of \$100 will be imposed if the renewal fee for this food establishment is received after the renewal date. In accordance with Chapter 500, F.S., failure to renew or an incomplete renewal may subject the food establishment to administrative fines not to exceed \$5,000 and/or permit suspension. Rule 5K-4.020(7), F.A.C., requires food establishments to notify the department within 30 days of closing or dissolution. Visit <https://foodpermit.fdacs.gov> to renew or dissolve this permit.

THIS FOOD PERMIT IS NOT TRANSFERABLE

FDACS-14414 Rev. 03/26

Principal Disclosures for the Applicant

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the Applicant entity:

The Applicant is a: Limited Liability Company

Provide the name of the Applicant Limited Liability Company:

Monroe Crossings PC, LLC

First Principal Disclosure Level:

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for the Applicant](#)

First Level Entity #	Select Type of Principal of Applicant	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Investor Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
2.	<u>Non-Investor Member</u>	<u>HP Capital Monroe Apartments, LLC</u>	<u>Limited Liability Company</u>
3.	<u>Non-Investor Member</u>	<u>Calston Monroe, LLC</u>	<u>Limited Liability Company</u>
4.	<u>Non-Investor Member</u>	<u>Housing Opportunities of Pinellas, Inc.</u>	<u>Non-Profit Corporation</u>
5.	<u>Manager</u>	<u>HP Capital Monroe Apartments, LLC</u>	<u>Limited Liability Company</u>
6.	<u>Manager</u>	<u>Calston Monroe, LLC</u>	<u>Limited Liability Company</u>
7.	<u>Manager</u>	<u>Housing Opportunities of Pinellas, Inc.</u>	<u>Non-Profit Corporation</u>
8.	<u><Select an option></u>	<u>Housing Opportunities of Pinellas, Inc. is an instrumentality</u>	<u><Select an option></u>
9.	<u><Select an option></u>	<u>of the Pinellas County Housing Authority</u>	<u><Select an option></u>

Second Principal Disclosure Level:

Monroe Crossings PC, LLC

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for the Applicant](#)

Select the corresponding First
Level Principal Entity # from
above for which the Second
Level Principal is being
identified

Select the type of Principal
being associated with the
corresponding First Level
Principal Entity

Select organizational structure
of Second Level Principal
identified

Second Level Entity #		Enter Name of Second Level Principal	
<u>2. (HP Capital Monroe Apartments,</u>	2.A. <u>Managing Member</u>	<u>Hemmer, Frederick</u>	<u>Natural Person</u>
<u>2. (HP Capital Monroe Apartments,</u>	2.B. <u>Managing Member</u>	<u>Hansen, Nicholas</u>	<u>Natural Person</u>
<u>5. (HP Capital Monroe Apartments,</u>	5.A. <u>Managing Member</u>	<u>Hemmer, Frederick</u>	<u>Natural Person</u>
<u>5. (HP Capital Monroe Apartments,</u>	5.B. <u>Managing Member</u>	<u>Hansen, Nicholas</u>	<u>Natural Person</u>
<u>3. (Calston Monroe, LLC)</u>	3.A. <u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
<u>6. (Calston Monroe, LLC)</u>	6.A. <u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>
<u>4. (Housing Opportunities of Pinelli</u>	4.A. <u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
<u>4. (Housing Opportunities of Pinelli</u>	4.B. <u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
<u>4. (Housing Opportunities of Pinelli</u>	4.C. <u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
<u>4. (Housing Opportunities of Pinelli</u>	4.D. <u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
<u>4. (Housing Opportunities of Pinelli</u>	4.E. <u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>
<u>7. (Housing Opportunities of Pinelli</u>	7.A. <u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
<u>7. (Housing Opportunities of Pinelli</u>	7.B. <u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
<u>7. (Housing Opportunities of Pinelli</u>	7.C. <u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
<u>7. (Housing Opportunities of Pinelli</u>	7.D. <u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
<u>7. (Housing Opportunities of Pinelli</u>	7.E. <u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>

Exhibit 15

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

How many Developers are part of this Application structure? (Please complete the Principal Disclosures for each of the three Co-Developers below.)

3
Select the organizational structure for the first Co-Developer entity:

The first Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

HP Capital Monroe Development, LLC

First Principal Disclosure Level:

HP Capital Monroe Development, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	Managing Member	Hemmer, Frederick	Natural Person
2.	Managing Member	Hansen, Nicholas	Natural Person

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the second Co-Developer entity:

The second Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

Calston Monroe Developer, LLC

First Principal Disclosure Level:

Calston Monroe Developer, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Managing Member</u>	<u>Chambers, Joseph J</u>	<u>Natural Person</u>

Principal Disclosures for the three Developers

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 7.27.26 Approved 7.30.26

Select the organizational structure for the third Co-Developer entity:

The third Co-Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

HOP- Targeted Opportunities in Time, LLC

First Principal Disclosure Level:

HOP- Targeted Opportunities in Time, LLC

[Click here for Assistance with Completing the Entries for the First Level Principal Disclosure for a Developer](#)

First Level Entity #	Select Type of Principal of Developer	Enter Name of First Level Principal	Select organizational structure of First Level Principal identified
1.	<u>Managing Member</u>	<u>Housing Opportunities of Pinellas, Inc.</u>	<u>Non-Profit Corporation</u>
2.	<u><Select an option></u>	<u>Housing Opportunities of Pinellas, Inc. is an instrumentality</u>	<u><Select an option></u>
3.	<u><Select an option></u>	<u>of the Pinellas County Housing Authority</u>	<u><Select an option></u>

Second Principal Disclosure Level:

HOP- Targeted Opportunities in Time, LLC

[Click here for Assistance with Completing the Entries for the Second Level Principal Disclosure for a Developer](#)

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being	Second Level Entity #	Select the type of Principal being associated with the corresponding First Level Principal Entity	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal identified
<u>1. (Housing Opportunities of Pinelli;</u>	1.A.	<u>Executive Director</u>	<u>Brickfield, Cornelius</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinelli;</u>	1.B.	<u>Officer/Director</u>	<u>Firebaugh, Chloe</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinelli;</u>	1.C.	<u>Officer/Director</u>	<u>Tomczak, Alen</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinelli;</u>	1.D.	<u>Officer/Director</u>	<u>Mineo, Wayne</u>	<u>Natural Person</u>
<u>1. (Housing Opportunities of Pinelli;</u>	1.E.	<u>Officer/Director</u>	<u>Hickey, Veronica</u>	<u>Natural Person</u>

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L26000397329
FILED 8:00 AM
July 27, 2026
Sec. Of State
kcostello

Article I

The name of the Limited Liability Company is:
MONROE CROSSINGS PC, LLC

Article II

The street address of the principal office of the Limited Liability Company is:
5852 DORA DRIVE
MOUNT DORA, FL. US 32757

The mailing address of the Limited Liability Company is:
5852 DORA DRIVE
MOUNT DORA, FL. US 32757

Article III

The name and Florida street address of the registered agent is:
JOSEPH J CHAMBERS
5852 DORA DRIVE
MOUNT DORA, FL. 32757

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: JOSEPH CHAMBERS

Article IV

The name and address of person(s) authorized to manage LLC:

Title: MGR
CALSTON MONROE, LLC
5852 DORA DRIVE
MOUNT DORA, FL. 32757 US

Title: MGR
PCHA-MONROE GP, LLC
11479 ULMERTON RD
LARGO, FL. 33778 US

Title: MGR
HP CAPITAL MONROE APARTMENTS, LLC
9800 4TH ST N, SUITE 200
SAINT PETERSBURG, FL. 33702 US

L26000397329
FILED 8:00 AM
July 27, 2026
Sec. Of State
kcostello

Article V

The effective date for this Limited Liability Company shall be:

07/27/2026

Signature of member or an authorized representative

Electronic Signature: JOSEPH CHAMBERS

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

L24000114827

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

☐ PICK-UP

☐ WAIT

☐ MAIL

(Business Entity Name)

(Document Number)

Certified Copies _____

Certificates of Status _____

Special Instructions to Filing Officer:

Office Use Only



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TALLAHASSEE, FL

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TALLAHASSEE, FLORIDA

CT CORP
(850) 656-4724
3458 lakesore Drive
Tallahassee, FL 32312

Date: 03/11/2024
Acc#120160000072

en: c DW

Name:	PCHA-Monroe GP, LLC
Document #:	
Order #:	15432778 - 1

Certified Copy of Arts & Amend:	☐		
Plain Copy:	☐		
Certificate of Good Standing:	☐		
Certified Copy of	☐		
Apostille/Notarial Certification:	☐	Country of Destination:	
		Number of Certs:	

Filing: ☒	Certified: ☒
	Plain: ☐
	COGS: ☐

Email Address for Annual Report Notifications:

nbrickfield@pinellas-housing.com

FILED
MAR 11 PM 3:56
CLERK OF STATE
TALLAHASSEE, FL

Availability _____
Document _____
Examiner _____
Updater _____
Verifier _____
W.P. Verifier _____
Ref# _____

Amount: \$ **155.00**

Thank you!

COVER LETTER

**TO: New Filing Section
Division of Corporations**

SUBJECT: PCHA-Monroe GP, LLC

Name of Limited Liability Company

The enclosed Articles of Organization and fee(s) are submitted for filing.

Please return all correspondence concerning this matter to the following:

Michael H. Syme

Name of Person

Fox Rothschild LLP

Firm/Company

500 Grant Street, Suite 2500

Address

Pittsburgh, PA 15219

City/State and Zip Code

nbrickfield@pinellashousing.com

E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

Neil Thompson

727

489-0771

at ()

Name of Person

Area Code

Daytime Telephone Number

Enclosed is a check for the following amount:

\$125.00 Filing Fee

☐ \$130.00 Filing Fee &
Certificate of Status

☒ \$155.00 Filing Fee &
Certified Copy
(additional copy is enclosed)

☐ \$160.00 Filing Fee
Certificate of Status
Certified Copy
(additional copy is enclosed)

Mailing Address

New Filing Section
Division of Corporations
P.O. Box 6327
Tallahassee, FL 32314

Street Address

New Filing Section Division
The Centre of Tallahassee
2415 N. Monroe Street, Suite 810
Tallahassee, FL 32303

2024 MAR 11 PM 3:56
OFFICE OF STATE
TALLAHASSEE, FL

FILED

ARTICLES OF ORGANIZATION FOR FLORIDA LIMITED LIABILITY COMPANY

ARTICLE I - Name:

The name of the Limited Liability Company is:

PCHA-Monroe GP, LLC

(Must contain the words "Limited Liability Company," "L.L.C.," or "LLC.")

ARTICLE II - Address:

The mailing address and street address of the principal office of the Limited Liability Company is:

Principal Office Address:

Mailing Address:

11479 Ulmerton Rd.

Largo, FL 33778

11479 Ulmerton Rd.

Largo, FL 33778

ARTICLE III - Registered Agent, Registered Office, & Registered Agent's Signature:

(The Limited Liability Company cannot serve as its own Registered Agent. You must designate an individual or another business entity with an active Florida registration.)

The name and the Florida street address of the registered agent are:

Neil Thompson

Name

11479 Ulmerton Rd.

Florida street address (P.O. Box **NOT** acceptable)

Largo

FL

33778

City

State

Zip

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 605, F.S.

Neil Thompson

Registered Agent's Signature (REQUIRED)

(CONTINUED)

2024 MAR 11 PM 3:56
SEC. OF STATE
TALLAHASSEE, FL

FILED

ARTICLE IV-

The name and address of each person authorized to manage and control the Limited Liability Company:

Title:

"AMBR" = Authorized Member

"MGR" = Manager

Name and Address:

AMBR

Housing Opportunities of Pinellas, Inc.

11479 Ulmerton Rd.

Largo, FL 33778

(Use attachment if necessary)

ARTICLE V: Effective date, if other than the date of filing: _____. (OPTIONAL)

(If an effective date is listed, the date must be specific and cannot be more than five business days prior to or 90 days after the date of filing.)

Note: If the date inserted in this block does not meet the applicable statutory filing requirements, this date will not be listed as the document's effective date on the Department of State's records.

ARTICLE VI: Other provisions, if any.

REQUIRED SIGNATURE:

Neil Thompson

Signature of a member or an authorized representative of a member:

This document is executed in accordance with section 605.0203 (1) (b), Florida Statutes.
I am aware that any false information submitted in a document to the Department of State
constitutes a third degree felony as provided for in s.817.155, F.S.

Neil Thompson

Typed or printed name of signee

Filing Fees:

\$125.00 Filing Fee for Articles of Organization and Designation of Registered Agent

\$ 30.00 Certified Copy (Optional)

\$ 5.00 Certificate of Status (Optional)

2024 MAR 11 PM 3:56
SECRETARY OF STATE
TALLAHASSEE, FL

FILED

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,

Section 4.A.5
Proximity, Mandatory Distance, and RECAP

e. Proximity

(1) PHA or RD 515 Proximity Point Boost

(a) Does the proposed Development qualify for the PHA Proximity Point Boost?

No

If "Yes", provide the required letter as Attachment 5.

(b) Does the proposed Development qualify for the RD 515 Proximity Point Boost?

No

If "Yes", provide the required letter as Attachment 10.

*Subject to verification of other RFA requirements

Points awarded for Proximity Point Boost*
0.0

(2) Transit Services

Applicants may select Private Transportation or provide the location information and distance for one of the remaining four Transit Services on which to base the Application's Transit Score.

(a) If the proposed Development will serve the Elderly (Non-ALF) Demographic Commitment, does the Applicant commit to provide Private Transportation?

(The proposed Development does not qualify to select this option.)

Points awarded for Transit Type
0.0

(a) Other Transit Services

Service	Latitude Coordinates	Longitude Coordinates	Distance*	Points awarded for Transit Type
Public Bus Stop 1	27.926233	-82.730755	0.24	4.5
Public Bus Stop 2	27.9263953	-82.7301756	0.27	
Public Bus Stop 3	27.916438	-82.732260	0.80	
Public Bus Transfer Stop				
Public Bus Rapid Transit Stop				
Public Rail Station				

This area intentionally left blank.

(3) Community Services

Up to three Community Services may be selected, for a maximum 4 points for each service.

Service	Service Name	Service Address	Distance*	Points awarded for Community Services
Grocery Store	Publix	5000 E Bay Dr, Clearwater, FL 33764-5719	0.70	3.0
Medical Facility				

Exhibit 18

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,

Pharmacy	ORANGE Publix Pharmacy	5000 E Bay Dr, Clearwater, FL 33764-5719	0.70	3.0
Public School	Belcher Elementary School	2215 Lancaster Dr, Clearwater, FL 33764	0.69	3.5

*Rounded up to the nearest hundredth of a mile. Distance between the coordinates of the Development Location Point and the coordinates of the service. The method used to determine the latitude and longitude coordinates must conform to Rule 5J-17, F.A.C., formerly 61G17-6, F.A.C. All calculations shall be based on "WGS 84" and be grid distances. The horizontal positions shall be collected to meet sub-meter accuracy (no autonomous hand-held GPS units shall be used).

f. **Racially and Ethnically Concentrated Areas of Poverty (RECAP)**
Is any part of the proposed Development located in a RECAP designated area?

No

(1) Does the Application qualify for the Development Subcategory of Redevelopment, with or without Acquisition?

(2) The proposed Development qualifies for the Local Government Areas of Opportunity Designation?

No

Florida Housing has reviewed some of the above information through an automated process and has made the determinations below. Items not specifically addressed by these determination statements are not being automatically reviewed.

Transit Service Points calculated based on the information entered above:	4.5
Community Service Points calculated based on the information entered above:	9.5
PHA or RD Proximity Boost points achieved?	0
Total Proximity Points calculated based on information entered above:	14
• Does the information provided at question 11 indicate that the Application qualifies for the Local Government Area of Opportunity Designation?	No
• Using the information entered above, does the Application meet the minimum Transit Point Requirement?	Yes
• Using the information entered above, does the Application meet the minimum Proximity Point Requirement?	Yes
• Using the information entered above, does the Application meet the Proximity Funding Preference?	Yes
• Total Proximity Points calculated based on information entered above, without the benefit of a PHA Boost:	14

RFA 2026-202 HOUSING CREDIT FINANCING FOR AFFORDABLE HOUSING
DEVELOPMENTS LOCATED IN BROWARD, DUVAL, HILLSBOROUGH, LEE,

Section 4.A.5
Location of Proposed Development

a. County: Pinellas County Size: Large

b. Address of Development Site
Street Address or closest designated intersection:

17068 US Hwy 19 N

City of Development Site*: Largo
**If the proposed Development is located in the unincorporated area of a county, provide that information.*

c. State whether the Development consists of Scattered Sites

(1) Does the proposed Development consist of Scattered Sites? No

d. Latitude and Longitude Coordinates

(1) Development Location Point

Latitude in decimal degrees, rounded to at least the sixth decimal place: 27.927969
Longitude in decimal degrees, rounded to at least the sixth decimal place: -82.734245

(2) If the proposed Development consists of Scattered Sites, for each Scattered Site that is in addition to the Development Location Point information provided in (1) above, identify the latitude and longitude coordinate, rounded to at least the sixth decimal place:

service_name	psta	psta
stop_id	2674	2789
stop_name	US HWY 19 N + 16991	US HWY 19 N + 17116
county	Pinellas	Pinellas
stop_lat	27.926373	27.926541
stop_lon	-82.730142	-82.730736
route_short_names	19	19
route_long_names	LARGO TRANSIT / TARPON SPRINGS	LARGO TRANSIT / TARPON SPRINGS

Exhibit 20



Exhibit 21



