

**BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

ROBERT KING HIGH PRESERVATION
PHASE ONE, LLC

Petitioner,
vs.

FHFC No. 2014-062BP
RFA 2014-103

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

MOTION FOR OFFICIAL RECOGNITION

Petitioner, Robert King High Preservation One, LLC ("Robert King") by and through undersigned counsel and pursuant to Sections 120.57(1)(f), 90.202(6), (7), (10) and 90.203, Florida Statutes, and Rule 28-106.213, Florida Administrative Code, respectfully requests the Informal Hearing Officer to take Official Recognition of certain official actions taken by Miami-Dade County. As good cause for the granting of this motion, Petitioner states,

1. On March 28, 2014, Robert King filed its Formal Written Protest and Petition for Formal Administrative Hearing, challenging Florida Housing's review of its Application submitted in response to Request for Applications 2014-003 Affordable Multifamily Housing Developments with SAIL Funding To Be Used In Conjunction With Tax Exempt Bond Financing and Non-Competitive Housing Credits, issued on September 19, 2013 (the "RFA"). Robert King subsequently moved to amend its Petition.

2. The issue in this proceeding is whether the documents submitted by Robert King establish Site Control as required by the RFA. It is the position of Robert King that Site Control has been achieved.

3. Rule 28-106.213(6), F.A.C., provides that Requests for Official Recognition shall be by motion and shall be considered in accordance with the provisions governing judicial notice in Sections 90.201-203, Florida Statutes.

4. Section 90.203, Florida Statutes, provides that a court shall take Judicial notice of any matter in Section 90.202, Florida Statutes, when a party requests it, provides any adverse party with written notice of the request, and furnishes the court with sufficient information to enable it to take judicial notice of the matter.

5. Pursuant to Section 90.202(6), (7), and (10) Florida Statutes, a Court may take judicial notice of the following matters:

(6) Official actions of the legislative, executive, and judicial departments of the United States and of any state, territory, or jurisdiction of the United States

(7) Duly enacted ordinances and resolutions of municipalities and counties located in Florida, provided such ordinances and resolutions are available in printed copies or as certified copies.

(10) Official seals of government agencies and department of the United States and of any state, territory, or jurisdiction of the United States.

6. Pursuant to these sections Robert King submits a certified copy of Resolution No. R-1020-13, dated December 3, 2013, issued by Miami-Dade

County attached hereto as Exhibit "A" and a certified copy of Resolution No. R-855-13, dated October 22, 2013, issued by Miami-Dade County as Exhibit "B".

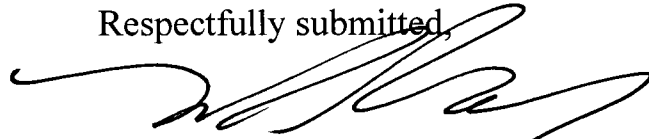
7. Robert King maintains that Exhibits A and B furnish the Informal Hearing Officer with sufficient information to take Official Recognition of these two documents. The Resolutions confirm that the Leases at issue in this proceeding were approved by Miami-Dade County.

8. By serving a copy of this Motion on Intervenors and Respondent, Robert King is providing all with written notice of this request.

9. Robert King has contacted all counsel who object to this motion to the extent it attempts to seek admission of documents that were not submitted as of the RFA submission deadline. (See 120.57(3)(f), Florida Statutes)

Wherefore, Petitioner requests the Informal Hearing Officer take Official Recognition of Exhibits A and B attached hereto.

Respectfully submitted,



MICHAEL P. DONALDSON
Florida Bar No. 0802761
CARLTON FIELDS JORDEN BURT, P.A.
Post Office Drawer 190
215 S. Monroe St., Suite 500
Tallahassee, Florida 32302
Telephone: 850/224-1585
Facsimile: 850/222-0398
Attorney for Petitioner

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that true and correct copy of the foregoing has been served by electronic mail on 14th day of July on the following:

Ashley Black, Agency Clerk
Wellington Meffert, General Counsel
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301
Email: ashley.black@floridahousing.org
Email: wellington.meffert@floridahousing.org
Florida Housing Finance Corporation

J. Stephen Menton, Esquire
Rutledge Ecenia, P.A.
119 South Monroe Street, Suite 202
Tallahassee, FL 32301
Email: smenton@rutledge-ecenia.com
Attorneys for Coquina Place Associates, Ltd.

Douglas Manson
Craig Varn
Manson & Bolves, P.A.
1101 West Swan Avenue
Tampa, FL 33606
Email: dmanson@mansonbolves.com
Email: cvarn@mansonbolves.com

Michael G. Maida
Michael G. Maida, P.A.
1709 Hermitage Boulevard, Suite 201
Tallahassee, FL 32308
Email: mike@maidalawpa.com
Attorneys for Tacolcy Tuscany Cove I, LLC



MICHAEL P. DONALDSON