

STATE OF FLORIDA  
FLORIDA HOUSING FINANCE CORPORATION

TWIN LAKES III, Ltd.,

Petitioner,

CASE NO. 2025-010BP  
Application #2025-293BS

v.

FLORIDA HOUSING FINANCE  
CORPORATION,

Respondent.

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

TWIN LAKES III, Ltd., (“Petitioner”) files this Formal Written Protest and Petition for Administrative Hearing (“Petition”) pursuant to sections 120.57(1) and (3), Florida Statutes, and Rules 28-110.004, 67-48 and 67-60 Florida Administrative Code (“F.A.C.”) to challenge the eligibility determinations, evaluations and proposed allocations set forth in the Notice of Intended Decision posted on January 24, 2025, by Respondent Florida Housing Finance Corporation (“Florida Housing”), with respect to Request for Applications 2024-213 for Live Local SAIL Financing for Mixed-Income, Mixed-Use, and Urban Infill Developments (the “RFA”).

**Parties**

1. Petitioner is a Florida limited partnership engaged in the business of providing affordable housing. Petitioner filed a response to the RFA for its proposed affordable housing project Twin Lakes Estates – Phase III (“Twin Lakes”), which was assigned application number #2025-293BS (“Petitioner’s Application”). Petitioner’s address is 3225 Aviation Avenue, 6<sup>th</sup> Floor, Coconut Grove, Florida 33133. For purposes of this proceeding, Petitioner’s address, telephone number and email address are those of its undersigned counsel.

2. Florida Housing is the affected agency.

3. 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.

4. Florida Housing's address is 227 North Bronough Street, Suite 5000, Tallahassee, FL 32301. Florida Housing's file number for Petitioner's application is #2025-293BS.

### **Notice**

5. Petitioner received notice of Florida Housing's intended decision to award funding pursuant to the RFA on January 24, 2025, when Florida Housing posted RFA 2024-213 Board Approved Scoring Results and the Board Approved Preliminary Awards on its website. See Exhibits A and B.

6. Petitioner's Application was deemed eligible for funding but was not included in the applications selected for a preliminary award. For the reasons set forth below, Petitioner asserts that its Application should have been selected for funding.

7. Petitioner timely filed its Notice of Intent to Protest Florida Housing's intended award decisions on January 29, 2025. See Exhibit C. This Petition is timely filed in accordance with Rule 67-009(2), F.A.C.

### **Background**

8. Florida Housing administers several programs aimed at assisting developers in building affordable housing in the state in an effort to protect financially marginalized citizens from excessive housing costs.

9. The instant RFA was issued to select applicants to be awarded funding from the State Apartment Incentive Loan ("SAIL") program to be used for the purposed of construction,

redevelopment or rehabilitation of affordable housing. Florida Housing is the designated entity in Florida responsible for allocating SAIL funding to assist in financing the construction or substantial rehabilitation of affordable housing. This RFA proposes to utilize \$100,389,979 in SAIL funding available through the Live Local Act, Section 420.5087, Fla. Stat., in conjunction with tax exempt bond financing and 4% housing credits to provide housing in accordance with the terms and conditions set forth in the RFA. See RFA @ 2.

### **The RFA**

10. Chapter 67-60, F.A.C., establishes “the procedures by which the Corporation shall . . . [a]dminister the competitive solicitation funding process for funding programs administered by Florida Housing.” See Rule 67-60.001(2), F.A.C.

11. On November 20, 2024, Florida Housing issued the RFA seeking applications for loans under the Live Local Act to develop mixed-income, mixed-use and urban infill developments for families and the elderly. See RFA @ 2.

12. The RFA was issued pursuant to and in accordance with Rules 67-48.009, 67-48.0095 and 67-60.003, F.A.C. as the competitive solicitation method for allocating the SAIL funding to competing applicants. Applications in response to the RFA were due by 3:00 p.m. on December 20, 2024 (the “Application Deadline”).

13. Florida Housing received several applications in response to the RFA. Petitioner timely submitted its Application requesting financing for its proposed housing development, Twin Lakes, located in Polk County. Petitioner’s Application satisfies all of the required elements of the RFA and is eligible for a funding award. See Exhibit B.

14. The RFA sets forth the information required to be submitted by an applicant and provides a general description of the type of projects that will be considered eligible for funding.

All applicants must meet the requirements set forth in the RFA, and include with their application the specified exhibits and comply with the requirements of the applicable statutes and administrative rules. The RFA also delineates the funding selection criteria and specifies that only those applications that meet all of the Eligibility Items will be eligible for funding. See RFA @ 79-80.

15. The RFA identifies several goals for the funding to be awarded:

1. Goal to fund one Publicly Owned Lands Development
2. Goal to fund one Family Development that qualifies for the Youth Aging Out of Foster Care Goal
3. Goal to fund one Application that qualifies for the Urban Infill Development
4. Goal to fund at least one Application that qualifies for the Florida Keys Area Goal.
5. Goal to fund one Elderly, Mixed-Use Development
6. Goal to fund at least one Mixed-Use Development

Applications may count towards multiple goals. For instance, if an Application is selected for the Elderly, Mixed-Use Development Goal, it will also count towards the goal to fund at least one Mixed-Use Development. See RFA @ 80.

16. The RFA includes a County Award Tally described as follows:

As each Application is selected for tentative funding, the county where the proposed Development is located will have one Application credited towards the County Award Tally.

The Corporation will prioritize eligible unfunded Applications that meet the Funding Test and are located within counties that have the lowest County Award Tally above other eligible unfunded Applications with a higher County Award Tally that also meet the Funding Test, even if the Applications with a higher County Award Tally are higher ranked.

See RFA @ 79-80.

17. The RFA delineates a sorting process based upon an application's priority category:

- a. The highest scoring Applications will be determined by first sorting together all eligible Priority 1 Applications from highest



score to lowest score, with any scores that are tied separated in the following order:

- b. First, by the Application's Tier status, with Applications that are deemed a Tier 1 receiving preference over Tier 2 Applications;
- c. By the Application's Leveraging Classification, applying the multipliers outlined in Item 3 of Exhibit C of the RFA (with Applications having the Leveraging Level of A receiving the highest preference);
- d. 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;
- e. 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
- f. By lottery number, resulting in the lowest lottery number receiving preference.
- g. This will then be repeated for all eligible Priority 2 Applications.

See RFA @ 80.

18. The RFA set forth the Funding Selection Process for selecting Applications for award as follows:

- a. First Application selected for funding

The first Application selected for funding will be the highest-ranking eligible Priority 1 Application that qualifies for the Family Publicly Owned Lands Development Goal if there is not an eligible Application that qualifies the highest-ranking eligible Application that qualifies for the Family Publicly Owned Lands Development Goal.

- b. Family, Youth Aging Out of Foster Care Goal

If not already met above, the next Application selected for funding will be the highest-ranking Priority 1 Application that qualifies for the Family, Youth Aging Out of Foster Care Goal, subject to County Award Tally and Funding Test.

If there is not an eligible Priority 1 Application that qualifies, the highest-ranking eligible Priority 2 Application that qualifies for the Family, Youth Aging Out of Foster Care Goal selected for funding, subject to County Award Tally and Funding Test.

c. Family, Urban Infill Development

If the goal to fund at least one Family, Urban Infill Development has not been met with the selection of the above Applications, the next Application selected for funding will be the highest-ranking Priority 1 Application that qualifies for the Family, Urban Infill Development Goal, subject to County Award Tally and Funding Test.

If there is not an eligible Priority 1 Application that qualifies, the highest-ranking eligible Priority 2 Application that qualifies for the Family, Urban Infill Development Goal selected for funding, subject to County Award Tally and Funding Test.

d. Priority 1 Family Applications that qualify for the Florida Keys Area Goal

The next Applications selected for funding will be the highest-ranking Priority 1 Family Application that qualifies for the Florida Keys Area Goal, subject to Funding Test.

e. Elderly, Mixed-Use Development Goal

The next Application selected for funding will be the highest-ranking eligible Priority 1 Application that qualifies for the Elderly, Mixed-Use Development Goal, subject to County Award Tally and Funding Test.

If there is not an eligible Application that qualifies, then the highest-ranking eligible Priority 2 Application that qualifies for the Elderly, Mixed-Use Development Goal will be selected for funding, subject to County Award Tally and Funding Test.

f. Family, Mixed-Use Development Goal

If the goal to fund at least one Mixed-Use Development has not been met with the selection of the above Applications, the next Application selected for funding will be the highest-ranking Priority 1 Family Application that qualifies for the Mixed-Use Development Goal, subject to County Award Tally and Funding Test.

If there is not an eligible Priority 1 Application that qualifies, the next Application selected for funding will be the highest-ranking eligible Priority 2 Application that qualifies for the Family, Mixed-Use Development Goal, subject to County Award Tally and Funding Test.

g. Allocation of Remaining Funding

1) If funding remains, the remaining eligible unfunded Priority 1 Applications that did not qualify for the Elderly Development, Mixed-Use Development Goal will be selected for funding, subject to the County Award Tally and Funding Tests.

2) If funding remains and there are no Applications that can be funded as described in (1) above, the remaining eligible unfunded Priority 2 Applications that did not qualify for the Elderly Development, Mixed-Use Development Goal will be selected for funding, subject to the County Award Tally and Funding Tests.

3) If funding remains, the remaining eligible unfunded Priority 1 Applications that qualify for the Elderly Development, Mixed-Use Development Goal will be selected for funding, subject to the County Award Tally and Funding Tests.

4) If funding remains and there are no Applications that can be funded as described in (3) above, the remaining eligible unfunded Priority 2 Applications that qualify for the Elderly Development, Mixed-Use Development Goal will be selected for funding, subject to the County Award Tally and Funding Tests.

h. Remaining Funding

If none of the eligible unfunded Applications can meet the Funding Test, or if there are no eligible unfunded Applications, then no further Applications will be selected for funding and the remaining funding will be distributed as approved by the Board. Any remaining funding will be used in a subsequent RFA pursuant to s 420.50871.

Florida Housing anticipates reviewing the Applications that were selected for funding and determining how that aligns with s. 420.50871 (1) and (2). Additional RFAs are anticipated to use remaining funding and address outstanding aspects of the statutory language.

See RFA @ 83-84.

19. A Review Committee comprised of Florida Housing staff was assigned to conduct the initial evaluation and scoring of the RFA responses. The Review Committee scored the applications and developed a chart listing the eligible and ineligible applications. See Exhibit A. The Review Committee also applied the funding selection criteria set forth in the RFA to develop a proposed allocation of funding to eligible participants. The preliminary rankings and allocations were presented to and approved by the Florida Housing Board on January 24, 2025. See Exhibit B.

20. Ten of the applications received in response to the RFA were preliminarily selected for funding. See Exhibit B.

21. Despite Petitioner's Application satisfying all of the required elements of the RFA and being determined an eligible Application, it was not preliminarily selected for funding.

22. The RFA and applicable rules provide an opportunity for applicants to file administrative challenges to the scoring and rankings set forth in the preliminary allocations. After resolution of the administrative challenges, results will be presented to the Florida Housing Board for final approval prior to issuing invitations to the applicants ultimately determined to be in the funding range to enter the credit underwriting process.

23. A correct determination of the developments eligible for funding under the RFA has not been made. Petitioner has identified two applications that were incorrectly scored and ranked:

1. The application filed by Uptown Toho Partners, Ltd. for its proposed development Saratoga at College Road Apartment Homes ("Saratoga") located in Marion County, (assigned application number 2025-355BS) was incorrectly deemed eligible and preliminarily selected for funding; and
2. The application filed by Helm's Bay Landing Workforce, Ltd. for its proposed development Helm's Bay Landing ("Helms Bay") located in Lee County (assigned application number 2025-333S), which was not preliminarily selected for funding but is potentially in line for funding ahead of Twin Lakes if Saratoga is determined to have been erroneously scored and ranked. The Helms Bay application was incorrectly scored and deemed eligible for funding.

24. For the reasons set forth below, the Saratoga application and the Helms Bay application should not be included in the funding range. The eligibility determination and preliminary ranking of the Saratoga application included a letter of intent ("LOI") for an Equity Commitment that fails to meet the mandatory requirements in the RFA, applicable Rules and prior Florida Housing precedents. Under the terms of the RFA and Florida Housing's rules, Saratoga should be deemed ineligible. The Helms Bay application did not include accurate and/or complete information to establish site control as required by the RFA. The Helms Bay application also did

not include accurate and/or complete information on its Development Cost Pro Forma. When the correct information is included, the Pro Forma shows a funding shortfall. The Helms Bay application was also scored incorrectly because it was awarded too many proximity points for the public bus stops identified in its application. Correcting the ranking and scoring errors of the Saratoga and Helms Bay applications will result in Petitioner's Application being ranked in the funding range and awarded funding for its proposed Twins Lakes development.

### **Substantial Interests Affected**

25. Petitioner's substantial interests are affected because deeming the Saratoga and Helms Bay applications eligible for funding results in those applications being ranked higher for funding selection purposes than Petitioner's Application. See *Madison Highlands, LLC v. Florida Housing Finance Corp.*, 220 So. 3d 467, 474 (Fla. 1st DCA 2017). If Saratoga and Helms Bay are correctly evaluated and scored, Petitioner's Application is next in line for funding pursuant to the funding goals and selection process outlined in the RFA. In other words, a correct determination of eligibility based on the RFA and rule requirements will result in the funding of Twin Lakes.

### **Errors in the Preliminary Awards and Determinations of Eligibility**

The LOI for the Equity Commitment Letter submitted with the Saratoga Application does not satisfy the RFA requirements.

26. As a mandatory application item, the RFA requires an applicant that is syndicating/selling housing credits as part of its proposed financing structure to include a letter of intent ("LOI") by an equity provider that meets certain specified criteria. Among the required criteria, the equity LOI submitted with an application must "include specific reference to the applicant as a beneficiary of the equity proceeds." RFA @ 63.

27. The Saratoga application contemplated the syndication of tax credits but did not include an LOI for an equity commitment that satisfies the RFA requirements.

28. Section (iii) on page 63 of the RFA specifically delineates the criteria that must be met for an equity proposal to be acceptable. As noted above, these criteria “include specific reference to the Applicant as the beneficiary of the equity process.” [emphasis added] The Saratoga application identifies the applicant as “Uptown Toho Partners, Ltd.” See page 1 of the Saratoga application. However, the equity LOI submitted with the Saratoga application lists the “applicant” (who is intended on being the beneficiary of the equity proceeds) as “Saratoga at College Road Partners, Ltd. Furthermore, the LOI is addressed to even another entity which is not the RFA applicant, “Foxwood Preserve Partners, Ltd.” Because the equity LOI does not name or identify the actual applicant “Uptown Toho Partners, Ltd.” as the beneficiary of the equity proceeds, it fails to meet the specific requirements of the RFA.

29. In addition, the equity LOI in the Saratoga application is incomplete. It specifically references an additional page as an attachment, but that page was not provided to Florida Housing with the Saratoga application and therefore the document is incomplete on its face.

30. Not only is the Saratoga equity LOI deficient for failing to identify the correct applicant, but the Saratoga application also has a fatal funding shortfall that results in its application being ineligible for funding. The equity LOI indicates the total proceeds to be provided by syndication of the tax credits would be \$11,522,318. However, the Development Cost Pro Forma included on page 29 of the Saratoga application indicates that the total amount of tax credits to be received from the syndication is \$12,918,623. In other words, the application fails to include evidence of an equity commitment from the tax credit syndicator that matches the projected funding needs and there is no source available to make up the deficiency. There is a difference of \$1,396,305 between the total equity proceeds identified in the Equity LOI and what was used in the Development Cost Pro Forma. If the total equity proceeds in the amount of \$11,522,318 set

forth in the equity LOI is inputted into the Development Cost Pro Forma, a clear funding shortfall exists that cannot be satisfied through any other funding source.

The Helms Bay Application fails to demonstrate site control as required by the RFA.

31. One of the mandatory requirements of the RFA is that an applicant must provide evidence of site control. See RFA p. 44. The pertinent provisions in the RFA state that an applicant must:

Demonstrate site control by providing, as **Attachment 6** to Exhibit A, the documentation required in Items (1), (2), and/or (3), as indicated below, demonstrating that it is a party to an eligible contract or lease, or is the owner of the subject property. Such documentation must include all relevant intermediate contracts, agreements, assignments, options, conveyances, intermediate leases, and subleases....

(1) Eligible Contract

An eligible contract must meet all of the following conditions:

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(c) The Applicant must be the buyer unless there is an assignment of the eligible contract, signed by the assignor and the assignee, which assigns all of the buyer's rights, title and interests in the eligible contract to the Applicant; and

(d) **The owner of the subject property must be the seller,** or is a party to one or more intermediate contracts, agreements, assignments, options, or conveyances between or among the owner, the Applicant, or other parties, that have the effect of assigning the owner's right to sell the property to the seller. **Any intermediate contract must meet the criteria for an eligible contract in (a) and (b) above.** **[Emphasis added.]**

RFA @ 44

32. To meet the RFA requirement to demonstrate site control, Helms Bay submitted a Purchase and Sale Agreement (“PSA”) dated June 26, 2024 between FORTMYERSFUTURE, LLC as seller and Helm’s Bay Landing Ltd. as buyer. See Attachment 6 to the Helms Bay application.

33. On page 51 of its application, Helms Bay identifies the underlying existing owner of the property as Bell Tower Campus Inn Limited Partnership. Even though Bell Tower Campus Inn Limited Partnership is identified as a party to the PSA, that entity did not sign the PSA. The only signature included in the PSA for the “seller” is for FORTMYERSFUTURE, LLC. The PSA indicates that it was “consented to” by Bell Tower Campus Inn Limited Partnership, but no written evidence of consent was provided. The County property appraiser's website and the deed for the property confirms the actual underlying existing owner of the property is “Bell Tower Campus Inn Limited Partnership.” Thus, the RFA provisions require that this entity had to either sign the site control documents or provide a written consent to the sale as part of the application. Because the site control document was only signed by “the seller” and Helms Bay application does not contain a PSA executed by the actual existing underlying owner of the property or a written consent from underlying existing owner (Bell Tower Campus Inn Limited Partnership) confirming its consent to the sale, the documentation included in the application fails to meet the requirements of the RFA.

34. The PSA included in the Helms Bay application also reveals a fatal funding shortfall in the Development Cost Pro Forma. The purchase price for the property is set forth in the PSA as \$4.5 million. The Development Cost Pro Forma of the Helms Bay application on pages 25 and 26, line item A3.F. indicates the total land cost as being \$2,205,000. There is a difference of \$2,295,000 between the actual price in the PSA and what was used in the Development Cost Pro Forma. If the actual purchase price of \$4.5 million set forth in the PSA is inputted into the Development Cost Pro Forma, a clear funding shortfall that exists that cannot be satisfied through any other funding source.



35. Based on the foregoing Helms Bay should be deemed ineligible for funding because its application fails to satisfy a mandatory eligibility item and has a funding shortfall that cannot be remedied.

The Helms Bay Application fails to meet the Proximity Funding Preference because the public bus stops cited in its application do not satisfy the definition of “sister stops” as set forth in the RFA.

36. The Helms Bay application was incorrectly scored and is not entitled to the required proximity points necessary to qualify for the Proximity Funding Preference. The RFA requires that applications located in a Medium County (such as Lee County, which is where the proposed Helms Bay development is located), achieve a minimum of 9 proximity points in order to achieve the Proximity Funding Preference. RFA @ 27. According to the RFA’s sorting order, applications that qualify for the Proximity Funding Preference hold a tie-breaker entitling them to be ranked above applications that do not qualify for the Proximity Funding Preference. RFA @ 80. The Helms Bay application indicated it was entitled to 4 proximity points for transit services based upon two public bus stops that they claimed satisfied the RFAs definition of “sister stops.” The term “sister stops” is defined in the RFA 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 @ 108. **[Emphasis added.]**

37. According to written correspondence received from the Lee County Department of Transportation, the two public bus stops identified in the Helms Bay application are both considered part of the eastbound Route 50. In other words, the two public bus stops do not serve buses traveling in different directions (e.g. eastbound and westbound) and consequently the public bus stops in the Helms Bay application do not qualify under criteria (v) of the definition of “sister stops.” “Sister stops” are intended to recognize the benefit of future residents being able to travel

in opposite directions which the two public bus stops in the Helms Bay application do not offer. In addition, the two stops are not separated by a street or intersection from each other as required under criteria (ii) of the definition of “sister stops” in the RFA because both stops are located on the same side of the street.

38. Since the two public bus stops in the Helms Bay application do not comply with the definition of “sister stops,” Helms Bay is not entitled to receive the four proximity points that was awarded to it in the preliminary scoring of the application. Instead, Helms Bay should only receive two proximity points for the bus stops identified in its application. Deducting the incorrectly claimed two proximity points results in the Helms Bay application achieving only 7 overall proximity points which means that the application fails to meet the required nine proximity points necessary to achieve the Proximity Funding Preference in the RFA for applications located in Medium Counties (such as Lee County). As a result, Helms Bay should not be scored or ranked ahead of Twin Lakes.

#### **Reservation of the Right to Amend**

39. 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**

40. Disputed issues of fact and law include, but are not limited to the following:
- a. Whether the equity LOI in the Saratoga application satisfies the RFA;
  - b. Whether there is a funding shortfall based on the information contained in the Saratoga application therefore rendering the application ineligible for funding;
  - c. Whether the Helms Bay application provided the required documents to demonstrate site control;

- d. Whether the Helms Bay application as submitted is ineligible for funding because its pro forma and the documents in the application reveal a funding shortfall;
- e. Whether the public bus stops identified in the Helms Bay application were erroneously scored as meeting the “sister stops” requirements in the RFA and whether the Helms Bay application qualifies for the Proximity Funding Preference awarded to it in the initial scoring;
- f. Whether the Saratoga application answered/complied with all of the RFA’s Mandatory Eligibility requirements;
- g. Whether the Helms Bay application is eligible for funding under the RFA;
- h. Whether the proposed awards are consistent with the RFA and the grounds on which the funding is to be allocated;
- i. Whether the proposed awards are based on a correct determination of the eligibility of the applicants, including Saratoga and Helms Bay;
- j. Whether Florida Housing's proposed award of funding to Saratoga is clearly erroneous, arbitrary and capricious and/or contrary to competition;
- k. Whether Florida Housing's determination that Saratoga is an eligible Applicant is erroneous, arbitrary and capricious and/or contrary to competition;
- l. Whether Florida Housing's proposed award of funding to Helms Bay is clearly erroneous, arbitrary and capricious and/or contrary to competition;
- m. Whether Florida Housing's determination that Helms Bay is an eligible Applicant is erroneous, arbitrary and capricious and/or contrary to competition; and
- n. Such other issues as may be revealed during the protest process.

**Concise Statement of Ultimate Facts**

41. Petitioner participated in the RFA process in order to compete for a funding award based on the scoring and ranking criteria in the RFA. Two developments preliminary scored higher than Petitioner were incorrectly deemed eligible and unjustifiably elevated ahead of the Petitioner. Petitioner will erroneously be denied funding if the eligibility determination of Saratoga and the eligibility determination and/or scoring for the Helms Bay application is not corrected as well as if the current proposed award to Saratoga and Helms Bay are allowed to become final. The funding of Saratoga and Helms Bay would be contrary to the provisions of the RFA and Florida Housing's governing statutes and rules.

42. Petitioner's Application for Twin Lakes should be selected for funding.

**Reservation to Amend**

43. Petitioner reserves the right to identify and raise additional scoring and ranking errors based upon information revealed during the protest process.

44. The process set forth in the RFA for determining eligible projects supports a determination that Saratoga and Helms Bay should be determined ineligible for funding based on the failure to meet the requisite mandatory items for funding eligibility set forth in the RFA.

**Statutes and Rules Entitling Relief**

45. The statutes and rules which are applicable in this case and that require modification of the proposed allocations include, but are not limited to, Section 120.57(3) and Chapter 420, Part V, Florida Statutes, and Chapter 28-110, 67-40 and 67-60, F.A.C.

**Demand for Relief**

46. Pursuant to Section 120.57(3), Florida Statutes, and Rules 28-110.004, F.A.C., the Petitioner requests 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 by mutual agreement, that the matter be referred to the Division of Administrative Hearings for a formal hearing to be conducted before an Administrative Law Judge pursuant to Section 120.57(1) and (3), Florida Statutes.
- c. Recommended and Final Orders be entered determining that Saratoga and Helms Bay are ineligible for an award of funding pursuant to RFA 2024-213 and that Twin Lakes be awarded funding and invited to credit underwriting.

Respectfully submitted this 10 day of February 2025.

/s/ J. Stephen Menton

J. Stephen Menton

Florida Bar No. 331181

Tana D. Storey

Florida Bar No. 514472

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Counsel for Petitioner

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this original has been filed with the Agency Clerk, Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000 Tallahassee, Florida 32301 via email at: CorporationClerk@floridahousing.org and an electronic copy provided to Ethan Katz, Assistant General Counsel, Florida Housing Finance Corporation, Hugh.Brown@floridahousing.org, via email, this 10 day of February 2025.

/s/ J. Stephen Menton

Attorney

RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (SAIL plus ELI)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity	Funding Preference	Florida Job Creation Preference	Lottery Number
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Eligible Applications

2025-292S	Pinellas Heights II	Pinellas	L	Brian Evjen	Newstar Development, LLC; PCHA Development, LLC	NC	MR 5-6	E, Non-ALF	132	12,540,000	\$0	Y	1	10	N	N	N	Y	Y	N	2	B	Y	Y	39
2025-293BS	Twin Lakes Estates - Phase III	Polk	M	Matthew A. Rieger	HTG Twin Lakes III Developer, LLC; Polk County Housing Developers, Inc.	NC	MR 4	F	86	7,353,000	\$0	Y	1	10	Y	Y	N	N	N	Y	2	B	Y	Y	10
2025-294S	Grand Oaks	Pinellas	L	Brian Evjen	Newstar Development, LLC; PCHA Development, LLC	NC	G	F	226	17,000,000	\$0	Y	1	10	Y	N	N	Y	N	N	2	A	Y	Y	26
2025-295BS	Grace Village	Miami-Dade	L	Jacques F. Saint-Louis	Stone Soup Development, Inc.; Grace Evangelical Baptist Church, Inc.	NC	HR	E, Non-ALF	120	10,000,000	\$0	Y	1	5	N	N	N	Y	Y	N	2	B	Y	Y	62
2025-297S	City View	Palm Beach	L	Linda Odum	Landmark Developers, Inc.; Magnolia Affordable Development, Inc.	NC	MR 5-6	E, Non-ALF	90	8,744,600	\$0	Y	1	10	N	N	N	Y	Y	N	2	B	Y	Y	24
2025-298S	Metro Grande I	Miami-Dade	L	Mara S. Mades	Cornerstone Group Partners, LLC	NC	HR	F	108	7,452,000	\$0	Y	1	10	Y	Y	N	N	N	Y	2	A	Y	Y	31
2025-299S	Drexel Senior Apartments	Palm Beach	L	Matthew A. Rieger	HTG Spectra Developer, LLC	NC	MR 4	F	188	11,656,000	\$0	Y	1	10	Y	Y	N	Y	N	N	1	A	Y	Y	36
2025-300BS	Gallery at Lummus Parc	Miami-Dade	L	Alberto Milo, Jr.	Gallery at Lummus Parc Developer, LLC	NC	HR	F	256	12,750,000	\$0	Y	1	10	Y	N	N	N	N	Y	1	A	Y	Y	14
2025-301S	TML Homestead Residences	Miami-Dade	L	Mario Procida	DBC Procida TMWL Homestead LLC	NC	MR 5-6	F	100	3,545,000	\$0	Y	1	10	N	Y	N	N	N	Y	2	A	Y	Y	35
2025-302S	350 Overtown	Miami-Dade	L	Mario Procida	TBP 350 Overtown LLC; SFCLT 350 Dev MM LLC	NC	HR	F	173	7,919,000	\$0	Y	2	10	N	Y	N	N	N	Y	2	A	Y	Y	9
2025-303BS	5300-5360 Summerlin	Lee	M	Mario Procida	TBP Summerlin LLC	NC	MR 4	F	230	6,676,000	\$0	Y	1	10	Y	N	N	N	N	Y	2	A	Y	Y	37
2025-304CS	Lofts at Tavernier	Monroe	S	James R. Hoover	TVC Development, Inc.	NC	G	F	86	13,084,700	\$1,629,260	Y	1	10	N	N	Y	Y	N	N	2	C	Y	Y	56
2025-305S	Gallery at Cross Creek	Broward	L	Alberto Milo, Jr.	Gallery at Cross Creek Developer, LLC	NC	HR	F	279	17,000,000	\$0	Y	1	10	Y	N	N	Y	N	Y	2	A	Y	Y	30
2025-306BS	Mission Flats	Orange	L	C. Hunter Nelson	ECG Florida 2023 IV Developer, LLC	NC	G	F	99	6,930,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	38

RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (\$AIL plus EU)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity Preference	Florida Job Creation Preference	Lottery Number
2025-307BS	WRDG T5	Hillsborough	L	Leroy Moore	WRDG T5 Developer, LLC	NC	HR	F	148	12,750,000	\$0	Y	1	10	Y	Y	N	N	N	Y	2	A	Y	Y	43
2025-308BS	Hollywood Vista	Broward	L	Matthew A. Rieger	HTG Vista Developer, LLC	NC	HR	F	118	9,000,000	\$0	Y	1	10	Y	Y	N	Y	N	Y	2	A	Y	Y	1
2025-309S	Isaiah Clark Apartments	Palm Beach	L	Matthew A. Rieger	HTG Union Baptist Developer, LLC; The Spectra Organization, Inc.; The Union Missionary Baptist Church, Inc.	NC	MR 5-6	E, Non-ALF	125	1,000,000	\$0	Y	2	10	N	N	N	Y	Y	N	2	A	Y	Y	51
2025-310BS	Arise Oneco	Manatee	M	Mario A. Sarlob	Legacy Landing Developer, LLC	NC	HR	F	125	10,669,250	\$0	Y	1	10	N	Y	N	N	N	Y	2	B	Y	Y	65
2025-311BS	RPV Parcel E	Hillsborough	L	Daniel Coakley	RPV Parcel E Developer, LLC; Banc of America Community Development Company, LLC	NC	MR 5-6	E, Non-ALF	160	15,200,000	\$0	Y	1	10	N	N	N	Y	Y	N	2	C	Y	Y	2
2025-312BS	FBC Affordable P1B	Brevard	M	Daniel Coakley	FBC Affordable P1B Developer, LLC; Banc of America Community Development Company, LLC	NC	MR 5-6	F	171	16,245,000	\$0	Y	1	10	N	Y	N	Y	N	Y	2	C	Y	Y	11
2025-313S	RPV Parcel D	Hillsborough	L	Daniel Coakley	RPV Parcel D Developer, LLC; Banc of America Community Development Company, LLC	NC	HR	F	220	13,300,000	\$0	Y	1	10	Y	Y	N	Y	N	Y	2	A	Y	Y	27
2025-316BS	Arbors at Manatee Cove	Manatee	M	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	MR 4	F	102	11,915,000	\$0	Y	1	10	N	Y	N	Y	N	N	2	C	Y	Y	57
2025-317BS	Fern Grove Phase Two	Orange	L	Scott Zimmerman	BDG Fern Grove Phase Two Developer, LLC	NC	MR 5-6	E, Non-ALF	129	11,496,200	\$0	Y	1	10	N	N	N	Y	Y	N	2	B	Y	Y	15
2025-319BS	Vista at Springtree	Broward	L	Kenneth Naylor	APC Springtree Development, LLC; Dania Beach Quality Housing Solutions, Inc.	NC	MR 5-6	F	96	5,952,000	\$0	Y	1	10	N	Y	N	N	N	Y	1	A	Y	Y	4

RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (SAIL plus ELI)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leverage Proximity	Funding Preference	Florida Job Creation Preference	Lottery Number
2025-320BS	Arbors at The Ridge	Lee	M	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	MR 4	E, Non-ALF	124	11,430,000	\$0	Y	1	10	N	N	N	Y	Y	N	2	C	Y	Y	28
2025-321BS	Wynwood West Apartments	Miami-Dade	L	Lewis V Swezy	RS Development Corp	NC	HR	F	184	18,000,000	\$0	Y	1	10	N	N	N	N	N	Y	1	B	Y	Y	63
2025-322BS	Claude Pepper I	Miami-Dade	L	David Burstyn	Redwood CP Developer I, LLC	NC	HR	E, Non-ALF	200	17,000,000	\$0	Y	2	10	Y	N	N	Y	Y	N	2	C	Y	Y	44
2025-323BS	Village Oaks Apartments	Escambia	M	C. Hunter Nelson	ECG Florida 2023 II Developer, LLC	NC	G	F	185	14,430,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	42
2025-324BS	Claude Pepper III	Miami-Dade	L	David Burstyn	Redwood CP Developer III, LLC	NC	HR	F	300	17,000,000	\$0	Y	2	10	Y	Y	N	N	N	Y	2	B	Y	Y	6
2025-325BS	De Hostos True Norte	Miami-Dade	L	Kristin M. Miller	TRG Community Development, LLC; De Hostos Neighborhood Trust Developer, LLC	NC	HR	F	148	17,520,000	\$0	Y	2	10	Y	N	N	N	N	Y	2	B	Y	Y	32
2025-326BS	Aveline Apartments	Miami-Dade	L	Mara S. Mades	Cornerstone Group Partners, LLC	NC	HR	F	120	8,800,000	\$0	Y	1	10	N	Y	N	N	N	Y	2	A	Y	Y	29
2025-327BS	Ekos at Bayonet Point III	Pasco	M	Christopher L. Shear	MHP Pasco III Developer, LLC	NC	MR 5-6	F	126	8,820,000	\$0	Y	1	10	N	N	N	N	N	Y	2	A	Y	Y	54
2025-328BS	Pinnacle at Cypress, Phase 2	Broward	L	David O. Deutch	Pinnacle Communities II, LLC	NC	HR	F	120	11,400,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	7
2025-329BS	Pinnacle on Sixth	Palm Beach	L	David O. Deutch	Pinnacle Communities II, LLC	NC	MR 4	F	90	8,550,000	\$0	Y	1	10	N	Y	N	N	N	Y	2	C	Y	Y	33
2025-330S	Pinnacle at Southland	Miami-Dade	L	David O. Deutch	Pinnacle Communities, LLC	NC	HR	F	178	11,036,000	\$0	Y	1	10	N	N	N	Y	N	Y	1	B	Y	Y	61
2025-333S*	Helm's Bay Landing	Lee	M	Jonathan L. Wolf	Helm's Bay Landing Workforce Developer, LLC	NC	MR 5-6	F	98	15,938,984	\$0	Y	1	10	N	N	N	N	N	Y	2	A	Y	Y	22
2025-334BS	The Tomlinson at Mirror Lake	Pinellas	L	Omabuwa Binitie	Dantes Partners South LLC; Cornerstone Strategic Partners, LLC; ALGO - FL LLC	NC	HR	F	195	17,707,800	\$0	Y	1	10	Y	N	N	N	N	Y	1	C	Y	Y	47
2025-335BS	Ekos Coconut	Sarasota	M	Christopher L. Shear	MHP Coconut Developer, LLC; Sara De Soto, LLC	NC	HR	F	158	14,220,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	40



RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (\$AIL plus EU)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-337BS	Arbors at Naranja	Miami-Dade	L	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	HR	F	120	15,700,000	\$0	Y	1	10	N	Y	N	Y	N	N	2	C	Y	Y	13
2025-338BS	Ekos at the Springs	Seminole	M	Christopher L. Shear	MHP Seminole I Developer, LLC	NC	MR 5-6	F	100	8,500,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	21
2025-339BS	Foxwood Preserve Apartment Homes	Marion	M	Jay P. Brock	Atlantic Housing Partners, L.L.L.P.	NC	G	F	186	15,936,108	\$0	Y	1	10	N	N	N	Y	N	N	2	A	Y	Y	53
2025-340S	Dulce Vida Apartments	Miami-Dade	L	Michael D Wohl	Dulce Vida Development, LLC	NC	HR	F	227	8,000,000	\$0	Y	1	10	Y	N	N	Y	N	Y	1	A	Y	Y	19
2025-341BS	Harmony Creek Residences	Orange	L	Kenneth Naylor	Harmony Creek Residences Development, LLC	NC	G	F	114	7,970,000	\$0	Y	1	10	N	Y	N	N	N	Y	2	B	Y	Y	17
2025-342BS	Lofts at Carver Theater	Miami-Dade	L	Kenneth Naylor	Carver Theater Development, LLC	NC	HR	F	71	5,000,000	\$0	Y	1	10	Y	Y	N	N	N	Y	2	A	Y	Y	25
2025-343S	Residences at Palm Court	Miami-Dade	L	Alberto Milo, Jr.	Residences at Palm Court Developer, LLC	NC	HR	F	316	1,500,000	\$0	Y	2	10	Y	N	N	Y	N	Y	2	A	Y	Y	34
2025-344S	Desoto Apartments II	Manatee	M	J. David Heller	Desoto Apartments II Developer LLC; WCZ Development LLC	NC	MR 4	F	200	15,500,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	8
2025-345S*	Catchlight Crossings Live Local Workforce	Orange	L	Jonathan L. Wolf	WHFT LL Workforce Developer, LLC	NC	MR 5-6	F	84	12,185,521	\$0	Y	1	10	N	N	N	N	N	Y	1	B	Y	Y	58
2025-346S	Edison Towers II	Miami-Dade	L	Carol Gardner	TEDC Affordable Communities Inc.	NC	HR	E, Non-ALF	96	9,120,000	\$0	Y	1	10	N	N	N	Y	Y	N	2	C	Y	Y	55
2025-347BS	Cedars Edge Apartment Homes	Duval	L	Iared M Houser	Pedcor Development Associates, LLC	NC	G	F	144	13,680,000	\$0	Y	1	10	N	N	N	N	N	Y	2	C	Y	Y	3
2025-348BS	Hoagland Flats	Osceola	M	C. Hunter Nelson	ECG Florida 2023 VII Developer, LLC	NC	MR 4	F	181	12,670,000	\$0	Y	1	10	N	N	N	N	N	Y	2	A	Y	Y	64
2025-349S	Valor Village	Escambia	M	Darren Smith	SHAG Valor Village Developer, LLC	NC	MR 4	F	90	8,550,000	\$0	Y	1	10	Y	Y	N	N	N	Y	2	C	Y	Y	52
2025-350BS	3 McCown Tower	Sarasota	M	Darren Smith	SHA Affordable Development, LLC; McCown Redevelopment II Fortis Developer, LLC	NC	HR	E, Non-ALF	96	9,120,000	\$0	Y	1	10	N	N	N	Y	Y	N	2	B	Y	Y	18
2025-352BS	Waldin Lakes	Miami-Dade	L	Michael N. Nguyen	AHFFL Waldin Lakes Developer, LLC	NC	HR	F	180	11,000,000	\$0	Y	1	10	N	Y	N	N	N	Y	1	B	Y	Y	50

RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (\$AIL plus ELI)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-353BS	Reserve at Eastwood I	Lee	M	Kathy S. Makino	Development Partners, Inc.; Lighthouse Development partners, LLC	NC	MR 4	F	168	350,000	\$0	Y	1	10	N	N	N	N	N	Y	2	A	Y	Y	60
2025-354BS	Notre Communauté	Miami-Dade	L	Stephanie Berman	Carrfour Supportive Housing, Inc.	NC	HR	F	112	16,965,000	\$0	Y	1	10	N	Y	N	Y	N	Y	2	C	Y	Y	20
2025-355BS	Saratoga at College Road Apartment Homes	Marion	M	Jay P. Brock	Atlantic Housing Partners, L.L.L.P.	NC	G	F	150	12,414,400	\$0	Y	1	10	N	N	N	Y	N	N	1	A	Y	Y	23
2025-356BS	Arbours at Seven Hills	Leon	M	Sam Johnston	Arbour Valley Development, LLC	NC	G	F	168	12,700,000	\$0	Y	1	10	N	N	N	N	N	Y	2	B	Y	Y	59

Ineligible Applications

2025-296BS	Dr. Marvin Dunn Manor	Miami-Dade	L	Douglas R. Mayer	Stone Soup Development, Inc.; Sailed Homes LLC	NC	HR	F	200	17,000,000	\$0	N	1	5	N	Y	N	N	N	Y	2	A	Y	Y	41
2025-314BS	David M. Pemberton Senior Residences	Miami-Dade	L	Willie Logan	Opa-locka Community Development Corporation, Inc. d/b/a Ten North Group	NC	HR	E, Non-ALF	131	12,445,000	\$0	N	1	10	N	N	N	Y	Y	N	2	C	Y	Y	5
2025-315BS	Meadow Oaks	Orange	L	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	MR 4	F	240	17,000,000	\$0	N	1	10	N	Y	N	N	N	Y	2	B	Y	Y	45
2025-318BS	Magnolia Terrace	Marion	M	Timothy M. Morgan	JIC Florida Development, LLC; Orlando Neighborhood Development Corporation, Inc.	NC	G	E, Non-ALF	78	7,635,000	\$0	N	1	10	N	N	N	Y	Y	N	2	C	Y	Y	46

RFA 2024-213 - All Applications

Application Number	Name of Development	County	County Size	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	Total Live Local SAIL Request Amount (\$AIL plus EI)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands Development Goal	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-331BS	BLVD 365	Lee	M	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	G	F	120	11,200,000	\$0	N	1	10	N	Y	N	N	N	Y	2	C	Y	Y	16
2025-332BS	The Residenz	Osceola	M	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	G	F	144	12,880,000	\$0	N	1	10	N	Y	N	N	N	Y	2	C	Y	Y	48
2025-336BS	Uptown Center, LLC	Miami-Dade	L	Kareem T Brantley	Integral Florida LLC	NC	HR	F	214	14,698,000	\$0	N	1	10	N	Y	N	Y	N	Y	1	C	Y	Y	12
2025-351S	Orange on 14th	Manatee	M	Brian E Swanton	Gorman & Company, LLC	NC	MR 4	F	174	10,788,000	\$0	N	1	10	N	N	N	N	N	Y	1	C	Y	Y	49

\*Corporation Funding Per Set-Aside was adjusted during scoring.

RFA 2024-213 – Review Committee Recommendations

Total Live Local SAIL Funding	100,389,979
Total Live Local SAIL Allocated	100,211,100
Total Live Local SAIL Remaining	178,879

Total 9% HC Available	1,629,260
Total 9% HC Allocated	1,629,260
Total 9% HC Remaining	-

To ensure an appropriate amount of funding is available for future RFAs that will fund additional projects meeting the criteria outlined in s. 420.50871(1)(a)-(d), the Corporation will award a maximum of \$62,000,000 in Live Local SAIL to Applications that do not qualify for any of the following: the Public Lands Development Goal; the Youth Aging Out of Foster Care Goal; or the Elderly Mixed-Use Development Goal.

Total Live Local SAIL Funding allocated to Developments that do not qualify for these goals: \$ 25,849,100.00

Application Number	Name of Development	County	County Size	Authorized Principal Representative	Name of Developer	Demo	Units	Total Live Local SAIL Request Amount (SAIL plus EI)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Public Lands Development	Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C/Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
<b>Goal to fund one Family Development that qualifies for the Public Lands Development Goal</b>																							
2025-300B5	Gallery at Lummus Parc	Miami-Dade	L	Alberto Milo, Jr.	Gallery at Lummus Parc Developer, LLC	F	256	12,750,000	\$0	Y	1	10	Y	N	N	N	N	Y	1	A	Y	Y	14
<b>Goal to fund one Family Development that qualifies for the Youth Aging Out of Foster Care Goal</b>																							
2025-319B5	Vista at Springtree	Broward	L	Kenneth Naylor	APC Springtree Development, LLC; Dania Beach Quality Housing Solutions, Inc.	F	96	5,952,000	\$0	Y	1	10	N	Y	N	N	N	Y	1	A	Y	Y	4
<b>Goal to fund at least one Family Development that qualifies for the Urban Infill Development Goal, if not met above</b>																							
MET ABOVE																							
<b>Goal to fund one Priority 1 Family Development that qualifies for the Florida Keys Area Goal</b>																							
2025-304C5	Lofts at Tavernier	Monroe	S	James R. Hoover	TVC Development, Inc.	F	86	13,084,700	\$1,629,260	Y	1	10	N	N	Y	Y	N	N	2	C	Y	Y	56
<b>Goal to fund one Application that qualifies for the Elderly, Mixed-Use Development Goal</b>																							
2025-317B5	Fern Grove Phase Two	Orange	L	Scott Zimmerman	BDG Fern Grove Phase Two Developer, LLC	E, Non-ALF	129	11,496,700	\$0	Y	1	10	N	N	N	Y	Y	N	2	B	Y	Y	15
<b>Goal to fund at least one Family Application that qualifies for the Mixed-Use Development Goal, if not met above</b>																							
MET ABOVE																							

RFA 2024-213 – Review Committee Recommendations

Application Number	Name of Development	County	County Site	Authorized Principal Representative	Name of Developer	Demo	Units	Total Live Local SAIL Request Amount (\$SAIL plus ELU)	9% HC Request Amount	Eligible For Funding?	Priority Level	Total Points	Publicly Owned Lands	Development Youth Aging Out of Foster Care Goal	Florida Keys Area Goal	Mixed-Use Development	Elderly, Mixed-Use Development	Urban In-Fill Development	Tier Level	A/B/C Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
<b>Remaining Funding:</b>																							
2025-355B5	Saratoga at College Road Apartment Homes	Marion	M	Jay P. Brock	Atlantic Housing Partners, L.L.P.	F	150	12,414,400	\$0	Y	1	10	N	N	N	Y	N	N	1	A	Y	Y	23
2025-2995	Drexel Senior Apartments	Palm Beach	L	Matthew A. Rieger	HTG Spectra Developer, LLC	F	188	11,656,000	\$0	Y	1	10	Y	Y	N	Y	N	N	1	A	Y	Y	36
2025-334B5	The Tomlinson at Mirror Lake	Pinellas	L	Ombuwa Bintie	Dantes Partners South LLC; Cornerstone Strategic Partners, LLC; ALGO - FL LLC	F	195	17,707,800	\$0	Y	1	10	Y	N	N	N	N	Y	1	C	Y	Y	47
2025-3135	RPV Parcel D	Hillsborough	L	Daniel Coakley	RPV Parcel D Developer, LLC; Banc of America Community Development Company, LLC	F	220	13,300,000	\$0	Y	1	10	Y	Y	N	Y	N	Y	2	A	Y	Y	27
2025-353B5	Reserve at Eastwood I	Lee	M	Kathy S. Makino	Development Partners, Inc.; Lighthouse Development partners, LLC	F	168	350,000	\$0	Y	1	10	N	N	N	N	N	Y	2	A	Y	Y	60
2025-3435	Residences at Palm Court	Miami-Dade	L	Alberto Milo, Jr.	Residences at Palm Court Developer, LLC	F	316	1,500,000	\$0	Y	2	10	Y	N	N	Y	N	Y	2	A	Y	Y	34

January 29, 2025

**Sent Via E-mail**

Ms. Ana McGlamory

Corporation Clerk

[CorporationClerk@floridahousing.org](mailto:CorporationClerk@floridahousing.org)

Florida Housing Finance Corporation

227 North Bronough, Suite 5000

Tallahassee, FL 32301

**RE: Notice of Intent to Protest, Request for Applications (RFA) 2024-213 Proposed Funding Selections**

Dear Corporation Clerk:

On behalf of Applicant Twin Lakes III, Ltd., for its proposed development Twin Lakes Estates - Phase III (Application No. 2025-29385), we hereby give notice of the intent to protest the Preliminary Awards Notice and Scoring and Ranking of applications for RFA 2024-213 posted by Florida Housing Finance Corporation on January 24, 2025, at 9:51am concerning Live Local SAIL Financing for Mixed Income, Mixed-Use, and Urban Infill Developments.

⇒ [Board Approved Preliminary Awards/Notice of Intended Decision \(posted January 24, 2025 at 9:51 a.m.\)](#)

▶ [RFA 2024-213 Applications Selected](#)

▶ [RFA 2024-213 Received Applications](#)

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

Respectfully Submitted



Rodrigo Paredes

Cc: Ethan Katz, FHFC Counsel

Exhibit C