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**STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION**

FLORIDA HOUSING
FINANCE CORPORATION

MHP BREVARD I, LLC

FHFC Case No. 2024-072BP

Petitioner,

FHFC RFA No. 2024-306

Appl. No. 2025-195BD

vs.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent.

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

Petitioner, MHP Brevard I, LLC (“MHP” or “Petitioner”), by and through its undersigned counsel and pursuant to sections 120.569, 120.57(1) and (3), Florida Statutes and Florida Administrative Code Chapters 28-110, 67-48 and 67-60 as well as the terms of Florida Housing Finance Corporation’s (“FHFC” or “Respondent”) Request for Applications 2024-306 at Section Six, hereby files its Formal Written Protest and Petition for a Formal Administrative Hearing to contest both the proposed award of funding as well as the eligibility, scoring and ranking determinations of FHFC with regard to RFA 2024-306 as set forth herein. In support of this Formal Protest and Petition, Petitioner states as follows:

Parties

1. The agency affected by this Protest and Petition is Florida Housing Finance Corporation located at 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329.
2. Petitioner, MHP Brevard I, LLC, is a Florida limited liability company whose business address is 777 Brickell Avenue, Suite 1300, Miami, Florida 33131. For purposes of this proceeding, the address of Petitioner is that of its undersigned counsel.

3. Petitioner submitted Application No. 2025-195BD in response to Request for Applications 2024-306 (“RFA”) seeking Community Development Block Grant-Disaster Recovery (“CDBG-DR”) financing for affordable housing developments located in Hurricane Ian impacted areas to assist with the development and construction of a 100-unit apartment complex in Brevard County, Florida to be named “Ekos at Rockledge Park.”

Notice

4. FHFC issued RFA 2024-306 on August 1, 2024. It was modified several times, and the final RFA was issued on August 24, 2024.

5. Applications in response to this RFA were due to be filed on or before September 5, 2024.

6. FHFC received thirty-nine applications in response to this RFA.

7. Petitioner timely filed its application number 2025-195BD requesting an allocation of funding for its proposed 100-unit affordable housing complex to be located in Brevard 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 FHFC’s preliminary determination of which applications were eligible or ineligible for funding as well as which applications were preliminarily selected for funding. These notices, published on two spreadsheets, were published on the FHFC website on October 22, 2024 at 10:36 a.m.

9. On October 25, 2024, Petitioner timely filed its Notice of Intent to Protest. See Exhibit A.¹

¹ The spreadsheets providing notice of eligibility and of preliminary selection are attached to the Notice of Intent to Protest.

10. This Formal Written Protest and Petition are timely filed in accordance with section 120.57(3), Florida Statutes, and Florida Administrative Code Rules 28-110.004 and 67-60.009.

Background

11. FHFC is a public corporation created in section 420.504, Florida Statutes, organized to provide and promote the public welfare by administering the governmental function of financing or refinancing housing and related facilities in Florida. FHFC's statutory authority is set forth in Chapter 420, Part V, Florida Statutes.

12. FHFC's statutory authority and mandates are set forth in Part V of Chapter 420, Florida Statutes. See, Sections 420.501-420.55, Fla. Stat.

13. Florida was allocated CDBG-DR funding from the United States Department of Housing and Urban Development (HUD) for award under the Florida Department of Commerce Workforce Affordable Housing Construction Program. The proposed developments must help address the unmet need in the HUD-Designated Most Impacted and Distressed ("HUD Designated MIDs"), or other areas impacted by the storms and deemed as a priority by the State that are not HUD MIDs ("State-Designated MIDs"). See RFA at p. 2

14. FHFC administers a competitive solicitation process to implement the provisions of its programs, including the CDBG-DR funding to be awarded pursuant to the RFA. See Chapter 67-60, F.A.C.

RFA 2024-306

15. Florida Housing expects to offer an estimated \$90,000,000 in funding for this RFA. RFA at p. 2.

16. The RFA sets forth the information that must be submitted by Applicants.

17. Applicants must meet certain mandatory eligibility requirements to be selected for funding. RFA at pp. 64-67.

18. The RFA contains a Selection Process setting forth funding goals:
- a. The highest ranking eligible unfunded Applications proposing Developments in HUD Designated MIDs will be selected first, subject to the County Award Tally and Funding Test.
 - b. If there are no eligible unfunded Applications proposing Developments in HUD Designated MIDs that meet the Funding Test, eligible unfunded Applications proposing Developments in State-Designated MIDs will be selected for funding, subject to the County Award Tally and Funding Test.

RFA at p. 68.

19. The RFA describes how the applications will be sorted as follows:

Application Sorting Order

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

- a. First, preference will be given to Applications that qualify for the Federal Funding Experience Preference which is outlined in Section Four, A.3.b.(4) 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 Classification, applying the multipliers outlined in Item 3 of Exhibit C of the RFA (with Applications having the Classification of A listed above Applications having the Classification of B);
- c. Next, preference will be given to Applications that qualify 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. Next, preference will be given to Applications that qualify for the Florida Job Creation Funding Preference which is outlined in Item 4 of Exhibit C (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);

e. Finally, by lottery number, with Applications that have a lower lottery number listed above Applications with a higher lottery number.

RFA at pp. 67-68.

Substantial Interests Affected

20. Petitioner’s substantial interests are being determined in this proceeding because Petitioner is an applicant for CDBG-DR funding pursuant to this RFA. Based on the funding goals, application sorting order and funding selection order, if the application ranked ahead of Petitioner is deemed ineligible or otherwise not selected for funding, then Petitioner’s application would be approved for funding.

21. As set forth further below, application number 2025-196BD filed by ECG Florida 2023 V, LP (“ECG”), selected for funding in Brevard County should not be selected for funding.

ECG FLORIDA 2023 V, LP

ECG Should Not Have Received The Proximity Funding Preference

22. Application number 2025-196BD is by ECG Florida 2023 V, LP for an 84-unit complex in Brevard County, Florida.

23. Brevard County is a “medium” county for purposes of this RFA. RFA at p. 20

24. Applications can be distinguished based on the scores they receive. Applications can earn a Proximity Funding Preference defined in Section Four, subsection A.5.e as follows:

e. Proximity

The Application may earn proximity points based on the distance between the Development Location Point and the Bus or Rail Transit Service (if Private Transportation is not selected at question 5.e.(2)(a) of Exhibit A) and the Community Services stated in Exhibit A. Proximity points are awarded according to the Transit and Community Service Scoring Charts outlined in Item 2 of Exhibit C. Proximity points will not be applied towards the total score.

There is no minimum eligibility requirement for transit points or total proximity score in this RFA. Application may still be eligible for funding even if the Application achieved zero proximity points. Proximity points will only be used to determine whether the Applicant meets the Proximity Funding Preference, as outlined in the chart below....

RFA at p. 21.

25. The RFA provides the following regarding “Community Services” (in pertinent part):

(3) Community Services (Up to three Community Services may be selected, for a maximum 4 Points for each service)

The Community Services that are available are Grocery Store, Medical Facility, Pharmacy, and Public School.

Up to three Community Services may be selected, for a maximum 4 Points for each service. If all four Community Services are selected, the Corporation will only award points for the three Community Services that are closest to the Development Location Point based on the distance stated in Exhibit A, even if the service that is furthest from the Development Location Point would have achieved a higher point value. In the event that the two Community Services that are furthest from the Development Location Point have an equal distance, the Corporation will select the service that is listed higher on the Community Service chart in Exhibit A. Under no circumstance will the fourth service be considered for points, even if during the litigation process, one of the Community Services is determined to not qualify for proximity points.

RFA at p. 23.

26. Applications for projects in Brevard County must achieve nine or more points to achieve the Proximity Funding Preference. RFA at p. 21.

27. To achieve the proximity points and to attempt to achieve the Proximity Funding Preference, ECG identified a Grocery Store, a Medical Facility and a Pharmacy. Attached hereto as Exhibit B is an excerpt from the ECG application with the identified Community Services; the

proximity of those services to the proposed site; and the points to be awarded for the identified Community Services.

28. ECG listed “VS Primo HealthCare” located at 840 Executive Lane, Suite 110, Rockledge, Florida 32955 as its identified “Medical Facility” and claimed four points for proximity to this location.

29. The RFA defines a “Medical Facility” as follows:

A medically licensed facility that employs or has under contractual obligation at least one physician licensed under Chapter 458 or 459, F.S. available to provide general medical treatment to patients by walk-in or by appointment. **Facilities that only treat specific classes of medical conditions, including, but not limited to clinics/emergency rooms affiliated with specialty or Class II hospitals, or facilities that only treat specific classes of patients (e.g., age, gender) will not be accepted.**

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

RFA at p. 87.

30. VS Primo HealthCare does not meet the definition of a “Medical Facility.” VS Primo HealthCare is a primary care medical practice owned by and staffed with a single physician—Vincent Sciortino, M.D.

31. Upon information and belief, VS Primo HealthCare, as of the application deadline (as well as prior and subsequent thereto) does not accept or treat patients under the age of sixteen. As such, VS Primo HealthCare restricts the patients it treats by age disqualifying it as a “Medical Facility.”

32. As such, no proximity points should be awarded for proximity to VS Primo HealthCare.

33. ECG identified items totaling eleven points for the Proximity Funding Preference. However, if the four points awarded to ECG for proximity to a Medical Facility are deducted, ECG would receive seven proximity points, would not receive the Proximity Funding Preference and should not have been selected for funding.

34. If ECG is not selected for funding, the next project in line for funding is MHP.

ECG Is Ineligible for Failing to List All Principals

35. To be eligible for funding, an Applicant must provide “Principal Disclosures for the Applicant” and “Principal Disclosures for the Developer” forms that meets the requirements of the RFA. RFA at pp. 64-65. Section Four of the RFA provides, in pertinent part:

To meet eligibility requirements, the Principals Disclosure Form must identify, pursuant to Exhibit H of the RFA and subsections 67-21.002(86), 67-21.0025(7), and 67-21.0025(8), F.A.C., if applicable, 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 Principals. Per section 67- 21.002(86), F.A.C., any Principal other than a natural person must be a legally formed entity as of the Application deadline.

If the Applicant is requesting 4% Housing Credits, the investor limited partner of an Applicant limited partnership or the investor member of an Applicant limited liability company (or a placeholder for the investor) must be identified on the Principal Disclosure Form.

RFA at p. 12 (emphasis added).

36. Florida Administrative Code Rule 67-48.002(94), defines “Principal” as follows:

(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. (emphasis added)

37. Attached hereto as Exhibit C are the Principal Disclosure for the Applicant and Principal Disclosure for the Developer forms submitted with the ECG application.

38. ECG is ineligible for funding because it failed to accurately complete both the Applicant and Developer Principal Disclosure Forms as required by the RFA and Florida Administrative Code Rule 67-48.0075(8).

39. Applicants are also eligible to receive five points for participating in the Advance Review Process for the Principal Disclosure Forms.

40. The Applicant in the ECG application is “ECG Florida 2023 V, LP.” The General Partner of “ECG Florida V, LP” is “ECG Florida 2023 V GP, LLC.” At the Second Principal Disclosure Level, ECG Florida 2023 V GP, LLC” lists a single Managing Member and eight other Members.

41. The Developer in the ECG Application is “ECG Florida 2023 V Developer, LLC.” At the First Principal Disclosure Level, a single Managing Member and eight other Members are listed.²

42. Both ECG Florida 2023 V GP, LLC and ECG Florida 2023 V Developer LLC are registered in Florida as Foreign limited liability companies.

43. Both ECG Florida 2023 V GP, LLC and ECG Florida 2023 V Developer LLC are Tennessee limited liability companies.

² The same people are listed at the Managing Member and other Members of both ECG Florida 2023 V GP, LLC and ECG Florida 2023 V Developer, LLC.

44. Attached hereto as Exhibit D is a printout from the Tennessee Secretary of State's website regarding ECG Florida 2023 V GP, LLC. Exhibit D indicates that ECG Florida 2023 V GP, LLC has eleven members. However, the ECG Principal Disclosure form only lists nine members.

45. Since at least two members are missing, the Principal Disclosure Form does not fully list all the required principals. As such, the ECG application is not eligible for funding. *HTG Village View, LLC v. Florida Housing Finance Corporation*, DOAH Case No. 18-2156BID (September 14, 2018).

46. ECG should not have been awarded five points for participation in the Advance Review Process because this form was incorrectly completed.

47. Attached hereto as Exhibit E is a printout from the Tennessee Secretary of State's website regarding ECG Florida 2023 V Developer, LLC. Exhibit E indicates that ECG Florida 2023 V Developer, LLC has eleven members. However, the ECG Principal Disclosure form only lists nine members.

48. Since at least two members are missing, the Principal Disclosure Form does not fully list all the required principals. As such, the ECG application is not eligible for funding. *HTG Village View, LLC v. Florida Housing Finance Corporation*, DOAH Case No. 18-2156BID (September 14, 2018).

49. ECG should not have been awarded five points for participation in the Advance Review Process because this form was incorrectly completed.

Disputed Issues Of Material Fact And Law

50. Disputed issues of material fact and law exist and entitle Petitioner to a formal administrative hearing pursuant to section 120.57, Florida Statutes. The disputed issues of material fact and law include, but are not limited to, the following:

- a. Whether the proposed award of funding for ECG is contrary to FHFC's governing statutes, FHFC's rules or policies, or the specifications of this RFA;
- b. Whether the proposed award of funding to ECG is clearly erroneous, arbitrary and capricious, or contrary to competition;
- c. Whether ECG should have been awarded points based on the listed Medical Facility;
- d. Whether ECG was entitled to the Proximity Funding Preference;
- e. Whether ECG is ineligible for failure to properly identify all of the principals of the applicant and/or developer;
- f. Whether ECG should lose five points for submitting inaccurate Principal Disclosure Forms in the Advance Review Process.
- g. Whether Petitioner's application should be chosen for the award of CDBG-DR funding;
- h. Such other issues as may be revealed during the protest process.

Concise Statement Of Ultimate Fact And Law, Including The

Specific Facts Warranting Reversal Of The Agency's Intended Award

51. Petitioner participated in the RFA process in order to compete for an award of CDBG-DR funds based upon the delineated scoring and ranking criteria. For the reasons set forth

above, the application by ECG should be deemed ineligible and/or should not be selected for funding.

52. A correct application of the eligibility, scoring and ranking criteria will result in an award of funding to Petitioner.

Statutes And Rules That Entitle Petitioner To Relief

53. The statutes and rules that entitle Petitioner to relief are found in sections 120.569, 120.57, Chapter 420, Part V, Florida Statutes, and Florida Administrative Code Chapters 28-110, 67-48 and 67-60.

Reservation Of Right To Amend

54. Petitioner reserves the right to amend this Petition as this matter proceeds.

Demand For Relief

WHEREFORE, MHP Brevard I, LLC respectfully requests:

- A. An opportunity to resolve this protest by mutual agreement as set forth in section 120.57(3), Florida Statutes.
- B. If this protest cannot be resolved by mutual agreement, that this matter be referred to the Florida Division of Administrative Hearings for assignment to an Administrative Law Judge for a formal hearing to be conducted pursuant to section 120.57(1) and (30), Florida Statutes.
- C. That the ALJ issue a Recommended Order determining that the application by ECG be deemed ineligible or otherwise not selected for funding pursuant to RFP 2024-306.
- D. That the ALJ issue a Recommended Order recommending that the application by Petitioner be selected for funding pursuant to RFP 2024-306.

- E. That a Final Order be issued by FHFC determining that the application by ECG be deemed ineligible or otherwise not selected for funding pursuant to RFP 2024-306.
- F. That a Final Order be issued by FHFC selecting Petitioner's application for funding pursuant to RFP 2024-306.
- G. That Petitioner be granted such other and further relief as is deemed just and proper.

Respectfully submitted this 4th day of November 2024.



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Attorneys for Petitioner MHP Brevard I, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing Formal Written Protest and Petition for Formal Administrative Hearing has been filed by e-mail with the Corporation Clerk (CorporationClerk@floridahousing.org), Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329 this 4th day of November 2024.



ATTORNEY

EXHIBIT A



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OCT 24, 2024 11:34am

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October 24, 2024

VIA EMAIL TO:
CorporationClerk@floridahousing.org

Corporation Clerk
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301-1329

RE: RFA 2024-306 Community Development Block Grant—Disaster Recovery to be Used in Conjunction with Tax-Exempt Bonds & 4% Housing Credits in Counties Deemed Hurricane Ian Recovery Priorities
Notice of Protest by MHP Brevard I, LLC, Applicant for Application No. 2025-195BD

Dear Corporation Clerk:

This law firm represents MHP Brevard I, LLC. Pursuant to sections 120.569 and 120.57(3), Florida Statutes and Florida Administrative Code Rules 28-110.003 and 67-60.009(2), MHP Brevard I, LLC, the applicant for Application No. 2025-195BD in RFA 2024-306, hereby gives notice of its intent to protest the determinations contained on the attached spreadsheets reflecting the proposed awards of funding (Att. A) and proposed scoring, eligibility and ineligibility determinations (Att. B) in RFA 2024-306 as approved by the Board of Florida Housing Finance Corporation on Tuesday, October 22, 2024. These spreadsheets were posted on the Corporation's website on Tuesday, October 22, 2024 at 10:36 a.m. This Notice of Protest is timely filed within 72 hours of said posting.

MHP Brevard I, LLC. will file its formal written protest within the time required by Section 120.57(3), Florida Statutes.

Sincerely,



Michael J. Glazer

cc: Ethan Katz (ethan.katz@floridahousing.org)

EXHIBIT A

RFA 2024-306 Board Approved Preliminary Awards

Total CDBG-DR Funding	99,276,000
Total CDBG-DR Allocated	92,900,000
Total CDBG-DR Remaining	6,376,000

Application Number	Name of Development	County	County Size	HUD or State-Designated MID?	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	CDBG-DR Base Request Amount	Eligible For Funding?	Total Points	Federal Funding Experience Preference	A/B Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-180BD	40th Street Lofts	Hillsborough	L	HUD	Renee Sandell	Paces Preservation Partners, LLC	NC	MR 4	F	65	\$6,500,000	Y	10	Y	A	Y	Y	1
2025-203BD	Villas on Central	Seminole	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 5-6	F	90	\$10,000,000	Y	10	Y	A	Y	Y	2
2025-187BD	Amberwood Lofts	Osceola	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	G	F	88	\$9,500,000	Y	10	Y	A	Y	Y	7
2025-196BD	Rockledge Apartments	Brevard	M	HUD	C. Hunter Nelson	ECG Florida 2023 V Developer, LLC	NC	G	F	84	\$6,900,000	Y	10	Y	A	Y	Y	15
2025-198BD	Ekos at Santa Clara	Collier	M	HUD	Christopher L. Shear	MHP Collier IV Developer, LLC	NC	G	F	84	\$10,000,000	Y	10	Y	A	Y	Y	19
2025-206D	Largo Station	Pinellas	L	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	MR 4	F	168	\$10,000,000	Y	10	Y	A	Y	Y	20
2025-168BD	Highland Creek	Polk	M	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	G	F	120	\$10,000,000	Y	10	Y	A	Y	Y	22
2025-186D	Desoto Apartments	Manatee	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 4	F	140	\$10,000,000	Y	10	Y	A	Y	Y	32
2025-185D	Cortaro Heights Apartments LLC	Hillsborough	L	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 4	F	100	\$10,000,000	Y	10	Y	A	Y	Y	3
2025-192BD	Harwick Place	Seminole	M	HUD	Julie von Weller	Harwick Place Developer, LLC; SHIA Development, LLC	NC	G	E, Non-ALF	80	\$10,000,000	Y	10	Y	A	Y	Y	4

On October 22, 2024, 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 unsuccessful 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.

ATTACHMENT A

RFA 2024-306 - Board Approved Scoring Results

Application Number	Name of Development	County	County Size	HUD or State-Designated MID?	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	CDBG-DR Base Request Amount	Non Competitive HC Request Amount	MMRB Request Amount	Eligible For Funding?	Total Points	Federal Funding Experience Preference	A/B Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
Eligible Applications																				
2025-1688D	Highland Creek	Polk	M	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	G	F	120	\$10,000,000	\$1,700,000	\$22,000,000	Y	10	Y	A	Y	Y	22
2025-1698D	Arbors at Fruitland Park	Lake	M	State	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	G	E, Non-ALF	50	\$7,250,000	\$713,816	\$8,000,000	Y	10	Y	B	Y	Y	29
2025-1708D	Arbors at Ruskin Place	Hillsborough	L	HUD	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	G	E, Non-ALF	56	\$9,995,000	\$673,701	\$9,500,000	Y	10	Y	B	Y	Y	35
2025-1718D	Kissimmee Cove	Osceola	M	HUD	Matthew A. Rieger	HTG Kissimmee Cove Developer, LLC	NC	MR 4	F	73	\$8,400,000	\$1,209,213	\$13,000,000	Y	10	Y	A	Y	Y	10
2025-1728D	Arbors at Whispering Pines	Manatee	M	HUD	Daniel F. Acosta	ACRUVA Community Developers, LLC	NC	MR 4	E, Non-ALF	52	\$9,250,000	\$836,856	\$9,300,000	Y	10	Y	B	Y	Y	11
2025-1738D	Enchanted Oaks	Osceola	M	HUD	Matthew A. Rieger	HTG Enchanted Oaks Developer, LLC	NC	G	F	100	\$10,000,000	\$1,602,821	\$19,000,000	Y	10	Y	A	Y	Y	25
2025-1748D	Orange on 14th	Manatee	M	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	MR 4	F	150	\$10,000,000	\$2,600,000	\$30,000,000	Y	10	Y	A	Y	Y	33
2025-175D	Cleveland Commons	Pinellas	L	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	MR 5-6	F	100	\$9,000,000	\$1,795,000		Y	10	Y	A	Y	Y	31
2025-1768D	Residences at Lake Isles	Osceola	M	HUD	Kenneth Naylor	Residences at Lake Isles Development, LLC	NC	G	F	90	\$10,000,000	\$1,290,199	\$15,000,000	Y	10	Y	B	Y	Y	9
2025-1778D	Harmony Creek Residences	Osceola	M	HUD	Kenneth Naylor	Harmony Creek Residences Development, LLC	NC	MR 4	F	90	\$10,000,000	\$1,335,332	\$15,500,000	Y	10	Y	A	Y	Y	18
2025-1808D	40th Street Lofts	Hillsborough	L	HUD	Renee Sandell	Paces Preservation Partners, LLC	NC	MR 4	F	65	\$6,500,000	\$1,236,032	\$16,700,000	Y	10	Y	A	Y	Y	1
2025-181D	Bay Village	Hillsborough	L	HUD	Darren Smith	SHAG Bay Village Developer, LLC	NC	MR 4	E, Non-ALF	80	\$10,000,000	\$1,407,934		Y	10	Y	A	Y	Y	27
2025-1828D	River Fox Commons	Lake	M	State	Renee Sandell	Paces Preservation Partners, LLC	NC	G	E, Non-ALF	92	\$7,000,000	\$1,476,697	\$18,000,000	Y	10	Y	A	Y	Y	37
2025-1848D	Emerald Pointe	Collier	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	High-Rise	F	72	\$8,250,000	\$1,346,918	\$17,500,000	Y	10	Y	A	Y	Y	24
2025-185D	Cortaro Heights Apartments LLC	Hillsborough	L	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 4	F	100	\$10,000,000	\$1,559,758		Y	10	Y	A	Y	Y	3

ATTACHMENT B

RFA 2024-306 - Board Approved Scoring Results

Application Number	Name of Development	County	County Size	HUD or State-Designated MID?	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	CDBG-DR Base Request Amount	Non Competitive HC Request Amount	MMRB Request Amount	Eligible For Funding?	Total Points	Federal Funding Experience Preference	A/B Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-186D	Desoto Apartments	Manatee	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 4	F	140	\$10,000,000	\$2,113,306		Y	10	Y	A	Y	Y	32
2025-187BD	Amberwood Lofts	Osceola	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	G	F	88	\$9,500,000	\$1,605,666	\$20,000,000	Y	10	Y	A	Y	Y	7
2025-188BD	Azalea Bloom	Seminole	M	HUD	Michael Ruane	CORE Azalea Bloom Developer LLC	NC	G	E, Non-ALF	80	\$10,000,000	\$1,045,628	\$13,000,000	Y	10	Y	A	Y	Y	30
2025-189BD	Valencia at Twin Lakes	Polk	M	HUD	Michael Ruane	CORE Sunset Ridge Developer LLC	NC	MR 4	E, Non-ALF	80	\$10,000,000	\$1,023,635	\$11,000,000	Y	10	Y	A	Y	Y	34
2025-191BD	The Adderley 2	Hillsborough	L	HUD	Shawn Wilson	Blue TA2 Developer, LLC	NC	MR 5-6	E, Non-ALF	100	\$9,500,000	\$1,651,475	\$18,250,000	Y	10	Y	A	Y	Y	16
2025-192BD	Harwick Place	Seminole	M	HUD	Julie von Weller	Harwick Place Developer, LLC; SHA Development, LLC	NC	G	E, Non-ALF	80	\$10,000,000	\$1,465,241	\$15,000,000	Y	10	Y	A	Y	Y	4
2025-193BD	Talland Park	Seminole	M	HUD	Jonathan L. Wolf	Talland Park Developer, LLC; SHA Development, LLC	NC	G	F	72	\$10,000,000	\$1,350,951	\$13,500,000	Y	10	Y	B	Y	Y	8
2025-194BD	Carisbrooke Terrace	Seminole	M	HUD	Jonathan L. Wolf	Carisbrooke Terrace Developer, LLC; SHA Development, LLC	NC	G	F	80	\$10,000,000	\$1,465,241	\$15,000,000	Y	10	Y	A	Y	Y	6
2025-195BD	Ekos at Rockledge Park	Brevard	M	HUD	Christopher L. Shear	MHP Brevard I Developer, LLC	NC	MR 5-6	F	100	\$10,000,000	\$1,504,683	\$20,250,000	Y	10	Y	A	Y	Y	26
2025-196BD	Rockledge Apartments	Brevard	M	HUD	C. Hunter Nelson	ECG Florida 2023 V Developer, LLC	NC	G	F	84	\$6,900,000	\$1,472,715	\$18,000,000	Y	10	Y	A	Y	Y	15
2025-198BD	Ekos at Santa Clara	Collier	M	HUD	Christopher L. Shear	MHP Collier IV Developer, LLC	NC	G	F	84	\$10,000,000	\$957,604	\$17,600,000	Y	10	Y	A	Y	Y	19
2025-199BD	Ekos at Flagler Pointe	Flagler	M	State	Christopher L. Shear	MHP Flagler I Developer, LLC	NC	G	F	96	\$9,500,000	\$1,538,424	\$20,650,000	Y	10	Y	A	Y	Y	23
2025-200BD	Ekos at Kissimmee Station	Osceola	M	HUD	Christopher L. Shear	MHP Osceola I Developer, LLC	NC	MR 5-6	F	85	\$9,500,000	\$1,200,649	\$16,975,000	Y	10	Y	A	Y	Y	38
2025-201D	Grand Oaks	Pinellas	L	HUD	Brian Evjen	Newstar Development, LLC; PCHA Development, LLC	NC	G	F	100	\$10,000,000	\$1,259,498		Y	10	Y	A	Y	Y	39
2025-203BD	Villas on Central	Seminole	M	HUD	J. David Heller	NRP Sunshine Development LLC; WCZ Development, LLC	NC	MR 5-6	F	90	\$10,000,000	\$1,470,217	\$18,000,000	Y	10	Y	A	Y	Y	2
2025-204BD	Plaza Hermosa	Osceola	M	HUD	Matthew A. Rieger	HTG Hermosa Family Developer, LLC	NC	MR 4	F	60	\$10,000,000	\$1,122,705	\$12,000,000	Y	10	Y	B	Y	Y	5
2025-205BD	Hartford & Saratoga Apartments	Pinellas	L	HUD	Michael Lundy	Blue Hartford Developer, LLC ; Housing Authority of the City of St. Petersburg	NC	MR 5-6	F	134	\$10,000,000	\$2,116,841	\$28,000,000	Y	10	Y	A	Y	Y	21

ATTACHMENT B

Application Number	Name of Development	County	County Size	HUD or State-Designated MID?	Name of Authorized Principal Representative	Name of Developer	Dev Category	Development Type	Demo	Units	COBG-DR Base Request Amount	Non Competitive HC Request Amount	MMRB Request Amount	Eligible For Funding?	Total Points	Federal Funding Experience Preference	A/B Leveraging	Proximity Funding Preference	Florida Job Creation Preference	Lottery Number
2025-206D	Largo Station	Pinellas	L	HUD	J. David Page	Southport Development, Inc., a WA corporation doing business in FL as Southport Development Services, Inc.	NC	MR 4	F	168	\$10,000,000	\$2,450,000		Y	10	Y	A	Y	Y	20

Ineligible Applications

2025-1788D	Poinciana Parc Phase II	Osceola	M	HUD	Oscar Sol	Poinciana Parc 2 Dev, LLC	NC	MR 5-6	E, Non-ALF	70	\$9,000,000	\$970,000	\$11,900,000	N	10	Y		Y	Y	14
2025-1798D	United Commons	Polk	M	HUD	Oscar Sol	United Commons Dev, LLC	NC	MR 4	E, Non-ALF	70	\$10,000,000	\$964,110	\$11,000,000	N	10	Y		Y	Y	13
2025-183D	Hillcrest Reserve	Polk	M	HUD	Darren Smith	SHAG Hillcrest Developer, LLC; WHHA Development, LLC	NC	G	F	72	\$10,000,000	\$956,121		N	10	Y		Y	Y	17
2025-1908D	Twin Lakes Estates - Phase III	Polk	M	HUD	Matthew A. Rieger	HTG Twin Lakes III Developer, LLC; Polk County Housing Developers, Inc.	NC	MR 4	F	86	\$10,000,000	\$1,021,694	\$21,000,000	N	10	Y		Y	Y	36
2025-1978D	Wave at Rose	Collier	M	HUD	Andrew Cribbs	OHG FL Collier I Rose Developer LLC	NC	MR 4	F	230	\$10,000,000	\$3,705,553	\$44,694,000	N	5	Y		Y	Y	28
2025-2028D	Vesta at Regal Bay	Osceola	M	HUD	Kory Geans	Newstar Development, LLC; Middleburg Communities, LLC	NC	MR 4	F	80	\$10,000,000	\$1,199,363	\$14,000,000	N	10	Y		Y	Y	12

On October 22, 2024, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee’s motion to adopt the scoring results above

Any unsuccessful 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 B

Exhibit A to RFA 2024-306 Community Development Block Grant — Disaster Recovery to be used in Conjunction with Tax-Exempt Bonds and Non-Competitive Housing Credits in Counties Deemed Hurricane Ian Recovery Priorities

Unless stated otherwise, all information requested pertains to the Development proposed in this Application upon completion. The effective date of this Exhibit A is 08/21/2024.

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: ECG Florida 2023 V, LP

(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 67-21, F.A.C. and wish to apply as a Non-Profit Application?

No

b. Developer Information

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

ECG Florida 2023 V Developer, LLC

(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: C. Hunter Nelson

Name of Developer entity (for the proposed Development) for which the above individual is a Principal: ECG Florida 2023 V Developer, LLC

(i) First development that meets the Developer experience requirement outlined in Section Four, A.3.b.(3)(a) of the RFA:

Name of Development: Southside Flats

Exhibit A to RFA 2024-306 Community Development Block Grant — Disaster Recovery to be used in Conjunction with Tax-Exempt Bonds and Non-Competitive Housing Credits in Counties Deemed Hurricane Ian Recovery Priorities

**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 4.

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

No

If "Yes", provide the required letter as Attachment 9.

Points awarded for Proximity Point Boost*
0.0

**Subject to verification of other RFA requirements*

(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 with a Demographic Commitment of Family.)

Points awarded for Transit Type
0.0

(b) Other Transit Services

Service	Latitude Coordinates	Longitude Coordinates	Distance*	Points awarded for Transit Type
Public Bus Stop 1	28.315797	-80.722149	0.09	2
Public Bus Stop 2				
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	Publix	1880 US-1 Rockledge, FL 32955	0.81	2.5
Medical Facility	VS Primo Health Care	840 Executive Lane, Suite 110 Rockledge, FL 32955	0.19	4.0

Exhibit A to RFA 2024-306 Community Development Block Grant — Disaster Recovery to be used in Conjunction with Tax-Exempt Bonds and Non-Competitive Housing Credits in Counties Deemed Hurricane Ian Recovery Priorities

Pharmacy	Publix	1880 US-1 Rockledge, Fl 32955	0.81	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).

Transit Service Points calculated based on the information entered above:	<u>2</u>
Community Service Points calculated based on the information entered above:	<u>9</u>
PHA or RD Proximity Boost points achieved?	<u>0</u>
Total Proximity Points calculated based on information entered above:	<u>11</u>
Using the information entered above, does the Application meet the Proximity Funding Preference?	<u>Yes</u>
Total Proximity Points calculated based on information entered above, without the benefit of a PHA Boost:	<u>11</u>

EXHIBIT C

Principal Disclosures for the Applicant

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 8.21.2024; Approved 8.22.2024

Select the organizational structure for the Applicant entity:

The Applicant is a: Limited Partnership

Provide the name of the Applicant Limited Partnership:

ECG Florida 2023 V, LP

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>General Partner</u>	<u>ECG Florida 2023 V GP, LLC</u>	<u>Limited Liability Company</u>
2.	<u>Investor LP</u>	<u>Nelson, C. Hunter (Place Holder)</u>	<u>Natural Person</u>

Second Principal Disclosure Level:

ECG Florida 2023 V, LP

[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

Select organizational structure of Second Level Principal identified

Second Level Entity #	Principal Entity	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal identified
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.A. Member</u>	<u>Rosenblum, Cary</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.B. Member</u>	<u>Brewer, Benjamin</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.C. Member</u>	<u>Seibels, Ryan</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.D. Member</u>	<u>Shepard, John</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.E. Member</u>	<u>Sohr, Scott</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.F. Member</u>	<u>Horowitz, Joseph</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.G. Member</u>	<u>McCord, Mark</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.H. Member</u>	<u>Jamison, Cochrane</u>	<u>Natural Person</u>
<u>1. (ECG Florida 2023 V GP, LLC)</u>	<u>1.I. Managing Member</u>	<u>Nelson, C. Hunter</u>	<u>Natural Person</u>

EXHIBIT C

Principal Disclosures for the Developer

APPROVED for HOUSING CREDITS
FHFC Advance Review
Received 8.21.2024; Approved 8.22.2024

How many Developers are part of this Application structure?

1

Select the organizational structure for the Developer entity:

The Developer is a: Limited Liability Company

Provide the name of the Developer Limited Liability Company:

ECG Florida 2023 V Developer, LLC

First Principal Disclosure Level:

ECG Florida 2023 V 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.	Member	Rosenblum, Cary	Natural Person
2.	Member	Brewer, Ben	Natural Person
3.	Member	Seibels, Ryan	Natural Person
4.	Member	Shepard, John	Natural Person
5.	Member	Sohr, Scott	Natural Person
6.	Member	Horowitz, Joseph	Natural Person
7.	Member	McCord, Mark	Natural Person
8.	Member	Jamison, Cochrane	Natural Person
9.	Managing Member	Nelson, C. Hunter	Natural Person

EXHIBIT D



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

Filing Information

Name: **ECG Florida 2023 V GP, LLC**

General Information

SOS Control #	001489961	Formation Locale:	TENNESSEE
Filing Type:	Limited Liability Company - Domestic	Date Formed:	12/05/2023
	12/05/2023 11:56 AM	Fiscal Year Close	12
Status:	Active	Member Count:	11
Duration Term:	Perpetual		
Managed By:	Member Managed		

Registered Agent Address

ELMINGTON AFFORDABLE, LLC
SUITE 500
1030 16TH AVE SOUTH
NASHVILLE, TN 37212

Principal Address

SUITE 500
1030 16TH AVE SOUTH
NASHVILLE, TN 37212

The following document(s) was/were filed in this office on the date(s) indicated below:

Date Filed	Filing Description	Image #
12/05/2023	Initial Filing	B1460-3210

Active Assumed Names (if any)	Date	Expires
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EXHIBIT E



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

Filing Information

Name: ECG Florida 2023 V Developer, LLC

General Information

SOS Control #	001489959	Formation Locale:	TENNESSEE
Filing Type:	Limited Liability Company - Domestic	Date Formed:	12/05/2023
	12/05/2023 11:56 AM	Fiscal Year Close	12
Status:	Active	Member Count:	11
Duration Term:	Perpetual		
Managed By:	Member Managed		

Registered Agent Address
ELMINGTON AFFORDABLE, LLC
SUITE 500
1030 16TH AVE SOUTH
NASHVILLE, TN 37212

Principal Address
SUITE 500
1030 16TH AVE SOUTH
NASHVILLE, TN 37212

The following document(s) was/were filed in this office on the date(s) indicated below:

Date Filed	Filing Description	Image #
12/05/2023	Initial Filing	B1460-3209

Active Assumed Names (if any)	Date	Expires
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