

STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION

FHFC CASE NO. 2013-022VW
Application No. 2011-61C

VILLAGE SQUARE FAMILY, LTD.

Petitioner,

vs.

FLORIDA HOUSING FINANCE CORPORATION,

Respondent.

**PETITION FOR WAIVER OF 2011 UNIVERSAL APPLICATION INSTRUCTIONS,
HOUSING CREDIT PROGRAM, PART III, SECTION B(4)(a)**

Petitioner, Village Square Family, Ltd., a Florida limited partnership (“VSF”) petitions Respondent Florida Housing Finance Corporation (“Florida Housing”) for a waiver of the requirement to provide heat pumps in all units located in the Development (as defined below). See 2011 Universal Application Instructions, Housing Credit Program, Part III, Section B(4)(a) (the “Instructions”), which incorporate the Energy Star Qualified Homes Florida Builder Option Package, Rev. 01/05/2010 (the “Builder Option Package”).

Pursuant to Section 120.542, Fla. Stat., and Rule 28-104.001 through 28-104.006, F.A.C., VSF requests a waiver of the Instructions in order to allow for the use of 16 SEER electric heat strips (the “Alternative HVAC”) in lieu of a heat pump (the “Required Pump”), in all units in the Development. In South Florida, where the differential between inside versus outside air temperature is much lower than in North Florida or other parts of the country, the Alternative HVAC is much more cost-efficient and energy-efficient than the Required Pumps. Inclusion of the Alternative HVAC will allow the Development to achieve a more favorable Home Energy

Rating System (“HERS”) Index Score, while providing a more efficient product and saving costs to VSF and the residents of the Development (see letter from U.S. Eco Logic, with energy calculations, attached hereto as Exhibit “A”).

A. THE PETITIONER

1. The name, address, telephone and facsimile numbers, and email address for VSF and its qualified representative are:

Village Square Family, Ltd.
c/o Roundstone Development, LLC
Attention: Lisa Taylor
2010 Valley View Lane, Suite 210
Farmer’s Branch, TX 75234
Telephone: 972-243-4205, Ext. 304
Facsimile: 972-243-4267
E-mail: lat@rstdev.com

2. The name, address, telephone and facsimile numbers, and e-mail address of VSF’s attorney, for purposes of this Petition, are:

Brian J. McDonough, Esquire
STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
150 West Flagler Street
Miami, Florida 33130
Telephone: 305-789-3350
Facsimile: 305-789-3395
E-mail: bmcdonough@stearnsweaver.com

B. THE DEVELOPMENT

3. In 2011, VSF applied for low-income housing tax credits from Florida Housing pursuant to the 2011 Universal Cycle. *See* Application No. 2011-61C. The Universal Application package has been adopted and incorporated into Chapter 67-48 by Rule 67-48.004(1)(a), F.A.C. (2011). VSF received an allocation of low income housing tax credits from Florida Housing.

4. VSF has closed on the financing and housing credit syndication which will provide funds for the construction of 144 units in 6 residential buildings and 1 non-residential building intended to serve low-income persons in Palm Beach County, Florida (the "Development").

5. The provisions of the 2011 Universal Cycle Application, by incorporation of the Builder Option Package, as more particularly described below, require the installation of a heating system, which might be satisfied by the use of the Required Pump (being described as a "right-sized \geq 14.5 SEER/12 EER/8.2 HSPF Energy Star qualified heat pump"), among other alternatives. However, it has been determined by VSF that the use of the Required Pump would be unduly expensive, and the substitution of the Alternative HVAC for the Required Pump would not decrease the energy efficiency of the Development or adversely impact the projected HERS Index Score of 69-70 (see letter from U.S. Eco Logic, with energy calculations, attached hereto as Exhibit "A").

6. The requested waiver will not adversely affect the Development. However, a denial of this Petition (a) would result in substantial, unnecessary economic hardship to VSF; (b) would provide residents with a less efficient and more expensive system in each apartment; and (c) would violate principles of fairness¹. § 120.542(2), Fla. Stat. (2011).

7. The waiver being sought is permanent in nature.

C. Rule from Which Relief is Requested and Statute Implemented by the Rule

8. VSF realleges and incorporates Paragraphs 1 through 7 as though fully set forth herein.

¹"Substantial hardship" means a demonstrated economic, technological, legal or other type of hardship to the person requesting the variance or waiver. "Principles of Fairness" are violated when literal application of a rule affects a particular person in a manner significantly different from the way it affects other similarly situated persons who are subject to the rule. Section 120.542(2), Florida Statutes.

9. VSF requests a waiver of Part III, Section B(4)(a) (i) of the Universal Application Instructions that provides as follows:

4. Energy Features (Threshold):

a. For all new construction units:

If the proposed Development includes any new construction units (regardless of the Development Category selected at Part III.A.3.a. of the Application), the eligible new construction units must (i) meet the requirements of Energy Star New Homes per the Energy Star Qualified Homes Florida Builder Option Package, Rev. 01/05/2010, which is incorporated by reference and available on the 2011 Universal Application link labeled Related References and Links, and...

10. The possible choices for heat distributions system are set forth in the Builder Option Package. As noted above, the Development's HERS score of 69-70, which is well below the maximum allowable HERS score of 77, will not be adversely affected by the requested waiver, as documented in the Energy Report; in fact, the HERS score will be reduced to a range between 63-67 using the 16 SEER heat strip system (see letter from U.S. Eco Logic, with energy calculations, attached hereto as Exhibit "A").

11. The Florida Housing Finance Corporation Act² designates Florida Housing as the State of Florida's housing credit agency within the meaning of Section 42(h)(7)(A) of the Internal Revenue Code of 1986. As the designated agency, Florida Housing is responsible for and is authorized to establish procedures for the allocation and distribution of low-income housing tax credits. § 420.5099(1) and (2), Fla. Stat. (2011). The Allocation Procedures were established in Rule Chapter 67, Florida Administrative Code. Accordingly, the Instruction that is

² The Florida Housing Finance Corporation Act is set forth in Sections 420.501 through 420.516 of the Florida Statutes (the "Act"). See also, Rule 67.40.020(1), F.A.C. (" 'Act' means the Florida Housing Finance Corporation Act, section 420.501 through 420.516 of the Florida Statutes")

the subject of VSF's waiver request is implementing, among other sections of the Act, the statutory authorization for Florida Housing's establishment of Allocation Procedures for Housing Credit Programs. § 420.5099(1) and (2), Fla. Stat. (2011).

D. Justification for Petitioner's Requested Waiver

12. VSF realleges and incorporates Paragraphs 1 through 11 as though fully set forth herein.

13. Under Section 120.542(1), Fla. Stat., and Chapter 28-104, F.A.C., Florida Housing has the authority to grant waivers to its rule requirements when strict application of these rules would lead to unreasonable, unfair and unintended consequences in particular instances. Waivers shall be granted when the person who is subject to the rule demonstrates that the application of the rule would (1) create a substantial hardship or violate principles of fairness, and (2) the purpose of the underlying statute has been or will be achieved by other means by the person. § 120.542(2), Fla. Stat. (2011).

14. In this instance, VSF meets the standards for a waiver.

15. Pursuant to the Instructions and the Builder Option Package, a heat pump is one choice among the various types of heating systems required in all new construction projects; the other available options for heating equipment listed in the Builder Option Package were inappropriate for the Development. Accordingly, VSF selected the Required Pump as its method of heat distribution for the Development. Subsequently, VSF determined that the Required Pump would be relatively inefficient, while being fairly expensive. The purported "efficiency" of the Required Pump means that it would take longer than its anticipated useful life to offset the increased cost of the equipment itself, compared to other comparable heat systems not included among the choices in the Builder Option Package. The Alternate HVAC has been the standard

specification for South Florida LIHTC developments because it is a more cost-efficient method which does not significantly compromise energy conservation measures.

E. Conclusion

16. Controlling statutes and Florida Housing's Rules are designed to allow the flexibility necessary to provide relief from rule requirements when strict application, in particular circumstances, would lead to unreasonable, unfair, or unintended results. Waivers should be granted when the applicant subject to the rule demonstrates that strict application would: (a) create a substantial hardship or violate principles of fairness; and (b) the purpose of the underlying statute has been or will be achieved by other means. §120.542(2), Fla. Stat. (2011).

17. The requested waiver will not adversely impact the Development or Florida Housing, and further, the required heating parameters set forth in the 2011 Application and Instructions are unduly expensive with no corresponding increase in efficiency, energy conservation or useful life, when compared against certain alternative products. The goal of incorporating energy-efficient systems and building components into the Development will be achieved through the installation of the Alternate HVAC, with no detriment to any party.

18. A denial of the requested waiver could result in a substantial hardship for VSF which would be required to install a product it knows to be more costly and less durable than the Alternate HVAC.

19. Finally, by granting the requested waiver, Florida Housing would recognize the economic realities and principles of fundamental fairness in the development of affordable rental housing. This recognition would promote participation by experienced developer entities in meeting the purpose of the Act through construction of projects in an economical and efficient

manner, as well as providing appropriate features and amenities within residential units developed for low-income residents.

20. Should Florida Housing require additional information, VSF is available to answer questions and to provide all information necessary for consideration of its Petition for Waiver of Part III, Section B(4)(a) of the Instructions which accompany the 2011 Universal Cycle Application.

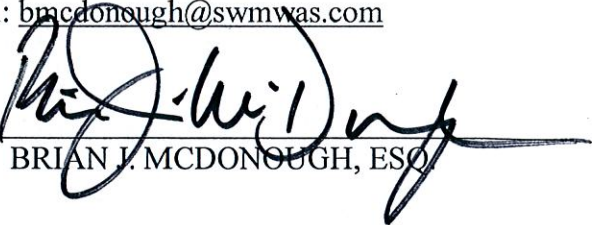
WHEREFORE, Petitioner Village Square Family, Ltd., respectfully requests that the Florida Housing Finance Corporation provide the following relief:

- A. Grant the Petition and all relief requested herein;
- B. Waive the requirement for the use of the Required Pump, and allow VSF to install the Alternate HVAC in the Development; and
- C. Grant such further relief as may be deemed appropriate.

Respectfully submitted,

STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
Counsel for Village Square Family, Ltd.
150 West Flagler Street, Suite 150
Miami, Florida 33131
Tel: (305) 789-3350
Fax: (305) 789-3395
E-mail: bmcdonough@swwmwas.com

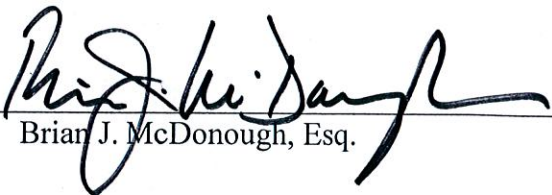
By:



BRIAN J. MCDONOUGH, ESQ.

CERTIFICATE OF SERVICE

The original Petition is being served by overnight delivery, with a copy served by electronic transmission for filing with the Corporation Clerk for the Florida Housing Finance Corporation, 227 North Bronough Street, Tallahassee, Florida 32301, with copies served by overnight delivery on the Joint Administrative Procedures Committee, 680 Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400, this ~~20th~~ day of August, 2013.

By: 
Brian J. McDonough, Esq.



Clifton Phillips
Roundstone Development
2010 Valley View Lane
Suite 210
Farmers Branch, TX 75234

Attached you will find a side by side comparison (per building type) between the BOP standards, the "As Designed" with 14 SEER Electric and window information you provided me with, and a 16 SEER HP.

Both methods are below a HERS Index of 77, but as you can see in the comparison, using the 14 SEER heat strip either gives you the same HERS Index as with the BOP standards and in most cases are even lower than the BOP standards (lower is better).

Respectfully,

Alan Hamblin
Regional Consultant

US-Eco Logic | TexEnergy Solutions
2611 E. Pioneer Dr. | Irving, TX | 75061
(c) 540.239.2655
alan.hamblin@usecologic.com

Builder: Cross Architects
 City: Delray Beach

Building A (14 SEER Electric)		Building A (BOP)		Building A (16 SEER)	
General Info		General Info		General Info	
Building	Building A	Building	Building A	Building	Building A
Climate Zone	2A	Climate Zone	2A	Climate Zone	2A
City	Delray Beach	City	Delray Beach	City	Delray Beach
Levels	3	Levels	3	Levels	3
Unit Location	Cond / Attic	Unit Location	Cond / Attic	Unit Location	Cond / Attic
ft ²	22800	ft ²	22800	ft ²	22800
Units	24	Units	24	Units	24
Bedrooms	48	Bedrooms	48	Bedrooms	48
Shell		Shell		Shell	
Slab	Uninsulated	Slab	Uninsulated	Slab	Uninsulated
Framed Floor	NA	Framed Floor	NA	Framed Floor	NA
Exterior Walls (U-Value)	0.085	Exterior Walls (U-Value)	0.129	Exterior Walls (U-Value)	0.085
Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041
Operable Windows	.30/.22	Operable Windows	.52/.32	Operable Windows	.30/.22
Fixed Windows	.30/.22	Fixed Windows	.52/.32	Fixed Windows	.30/.22
French Door	.42/.33	French Door	.52/.32	French Door	.42/.33
Solid Door (R-Value)	4.76	Solid Door (R-Value)	2.8	Solid Door (R-Value)	4.76
Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033
Window to Wall Ratio	11%	Window to Wall Ratio	11%	Window to Wall Ratio	11%
Window to Floor Ratio	10%	Window to Floor Ratio	10%	Window to Floor Ratio	10%
Mechanical		Mechanical		Mechanical	
Water Heater	.91 EF 40 gal	Water Heater	.93 EF 40 gal	Water Heater	.91 EF 40 gal
Heating	Strip Heat	Heating	8.2 HSPF	Heating	Strip Heat
Cooling	14 SEER	Cooling	14.5 SEER	Cooling	16 SEER
Thermostat	Programmable	Thermostat	Programmable	Thermostat	Programmable
Duct Leakage	6 cfm per 100 sq. ft.	Duct Leakage	3 cfm per 100 sq. ft.	Duct Leakage	6 cfm per 100 sq. ft.
Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R
Duct Location	Cond / Attic	Duct Location	Cond / Attic	Duct Location	Cond / Attic
Infiltration	7 ACH 50	Infiltration	7 ACH 50	Infiltration	7 ACH 50
Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes
Lights & Appliances		Lights & Appliances		Lights & Appliances	
Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr
Dishwasher	.68 EF	Dishwasher	.68 EF	Dishwasher	.68 EF
Ceiling Fan	NA	Ceiling Fan	NA	Ceiling Fan	NA
CFL	80%	CFL	60%	CFL	80%
Energy Star		Energy Star		Energy Star	
HERS Score	69	HERS Score	70	HERS Score	66

Builder: Cross Architects
 City: Delray Beach

Building B (14 SEER Electric)		Building B (BOP)		Building B (16 SEER)	
General Info		General Info		General Info	
Building	Building B	Building	Building B	Building	Building B
Climate Zone	2A	Climate Zone	2A	Climate Zone	2A
City	Delray Beach	City	Delray Beach	City	Delray Beach
Levels	3	Levels	3	Levels	3
Unit Location	Cond / Attic	Unit Location	Cond / Attic	Unit Location	Cond / Attic
ft ²	30408	ft ²	30408	ft ²	30408
Units	24	Units	24	Units	24
Bedrooms	72	Bedrooms	72	Bedrooms	72
Shell		Shell		Shell	
Slab	Uninsulated	Slab	Uninsulated	Slab	Uninsulated
Framed Floor	NA	Framed Floor	NA	Framed Floor	NA
Exterior Walls (U-Value)	0.085	Exterior Walls (U-Value)	0.129	Exterior Walls (U-Value)	0.085
Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041
Operable Windows	.30/.22	Operable Windows	.52/.32	Operable Windows	.30/.22
Fixed Windows	.30/.22	Fixed Windows	.52/.32	Fixed Windows	.30/.22
French Door	.42/.33	French Door	.52/.32	French Door	.42/.33
Solid Door (R-Value)	4.76	Solid Door (R-Value)	2.8	Solid Door (R-Value)	4.76
Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033
Window to Wall Ratio	11%	Window to Wall Ratio	11%	Window to Wall Ratio	11%
Window to Floor Ratio	9%	Window to Floor Ratio	9%	Window to Floor Ratio	9%
Mechanical		Mechanical		Mechanical	
Water Heater	.91 EF 40 gal	Water Heater	.93 EF 40 gal	Water Heater	.91 EF 40 gal
Heating	Strip Heat	Heating	8.2 HSPF	Heating	Strip Heat
Cooling	14 SEER	Cooling	14.5 SEER	Cooling	16 SEER
Thermostat	Programmable	Thermostat	Programmable	Thermostat	Programmable
Duct Leakage	6 cfm per 100 sq. ft.	Duct Leakage	3 cfm per 100 sq. ft.	Duct Leakage	6 cfm per 100 sq. ft.
Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R
Duct Location	Cond / Attic	Duct Location	Cond / Attic	Duct Location	Cond / Attic
Infiltration	7 ACH 50	Infiltration	7 ACH 50	Infiltration	7 ACH 50
Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes
Lights & Appliances		Lights & Appliances		Lights & Appliances	
Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr
Dishwasher	.68 EF	Dishwasher	.68 EF	Dishwasher	.68 EF
Ceiling Fan	NA	Ceiling Fan	NA	Ceiling Fan	NA
CFL	80%	CFL	60%	CFL	80%
Energy Star		Energy Star		Energy Star	
HERS Score	66	HERS Score	67	HERS Score	64

Builder: Cross Architects
City: Delray Beach

Building C (14 SEER Electric)		Building C (BOP)		Building C (16 SEER)	
General Info		General Info		General Info	
Building	Building C	Building	Building C	Building	Building C
Climate Zone	2A	Climate Zone	2A	Climate Zone	2A
City	Delray Beach	City	Delray Beach	City	Delray Beach
Levels	3	Levels	3	Levels	3
Unit Location	Cond / Attic	Unit Location	Cond / Attic	Unit Location	Cond / Attic
ft ²	29429	ft ²	29429	ft ²	29429
Units	24	Units	24	Units	24
Bedrooms	72	Bedrooms	72	Bedrooms	72
Shell		Shell		Shell	
Slab	Uninsulated	Slab	Uninsulated	Slab	Uninsulated
Framed Floor	NA	Framed Floor	NA	Framed Floor	NA
Exterior Walls (U-Value)	0.085	Exterior Walls (U-Value)	0.129	Exterior Walls (U-Value)	0.085
Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041
Operable Windows	.30/.22	Operable Windows	.52/.32	Operable Windows	.30/.22
Fixed Windows	.30/.22	Fixed Windows	.52/.32	Fixed Windows	.30/.22
French Door	.42/.33	French Door	.52/.32	French Door	.42/.33
Solid Door (R-Value)	4.76	Solid Door (R-Value)	2.8	Solid Door (R-Value)	4.76
Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033
Window to Wall Ratio	12%	Window to Wall Ratio	12%	Window to Wall Ratio	12%
Window to Floor Ratio	9%	Window to Floor Ratio	9%	Window to Floor Ratio	9%
Mechanical		Mechanical		Mechanical	
Water Heater	.91 EF 40 gal	Water Heater	.93 EF 40 gal	Water Heater	.91 EF 40 gal
Heating	Strip Heat	Heating	8.2 HSPF	Heating	Strip Heat
Cooling	14 SEER	Cooling	14.5 SEER	Cooling	16 SEER
Thermostat	Programmable	Thermostat	Programmable	Thermostat	Programmable
Duct Leakage	6 cfm per 100 sq. ft.	Duct Leakage	3 cfm per 100 sq. ft.	Duct Leakage	6 cfm per 100 sq. ft.
Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R
Duct Location	Cond / Attic	Duct Location	Cond / Attic	Duct Location	Cond / Attic
Infiltration	7 ACH 50	Infiltration	7 ACH 50	Infiltration	7 ACH 50
Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes
Lights & Appliances		Lights & Appliances		Lights & Appliances	
Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr
Dishwasher	.68 EF	Dishwasher	.68 EF	Dishwasher	.68 EF
Ceiling Fan	NA	Ceiling Fan	NA	Ceiling Fan	NA
CFL	80%	CFL	60%	CFL	80%
Energy Star		Energy Star		Energy Star	
HERS Score	66	HERS Score	67	HERS Score	63

Builder: Cross Architects
 City: Delray Beach

Building D (14 SEER Electric)		Building D (BOP)		Building D (16 SEER)	
General Info		General Info		General Info	
Building	Building D	Building	Building D	Building	Building D
Climate Zone	2A	Climate Zone	2A	Climate Zone	2A
City	Delray Beach	City	Delray Beach	City	Delray Beach
Levels	3	Levels	3	Levels	3
Unit Location	Cond / Attic	Unit Location	Cond / Attic	Unit Location	Cond / Attic
ft ²	21600	ft ²	21600	ft ²	21600
Units	24	Units	24	Units	24
Bedrooms	42	Bedrooms	42	Bedrooms	42
Shell		Shell		Shell	
Slab	Uninsulated	Slab	Uninsulated	Slab	Uninsulated
Framed Floor	NA	Framed Floor	NA	Framed Floor	NA
Exterior Walls (U-Value)	0.085	Exterior Walls (U-Value)	0.129	Exterior Walls (U-Value)	0.085
Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041	Party Walls (U-Value)	0.041
Operable Windows	.30/.22	Operable Windows	.52/.32	Operable Windows	.30/.22
Fixed Windows	.30/.22	Fixed Windows	.52/.32	Fixed Windows	.30/.22
French Door	.42/.33	French Door	.52/.32	French Door	.42/.33
Solid Door (R-Value)	4.76	Solid Door (R-Value)	2.8	Solid Door (R-Value)	4.76
Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033	Ceiling (U-Value)	0.033
Window to Wall Ratio	11%	Window to Wall Ratio	11%	Window to Wall Ratio	11%
Window to Floor Ratio	11%	Window to Floor Ratio	11%	Window to Floor Ratio	11%
Mechanical		Mechanical		Mechanical	
Water Heater	.91 EF 40 gal	Water Heater	.93 EF 40 gal	Water Heater	.91 EF 40 gal
Heating	Strip Heat	Heating	8.2 HSPF	Heating	Strip Heat
Cooling	14 SEER	Cooling	14.5 SEER	Cooling	16 SEER
Thermostat	Programmable	Thermostat	Programmable	Thermostat	Programmable
Duct Leakage	6 cfm per 100 sq. ft.	Duct Leakage	3 cfm per 100 sq. ft.	Duct Leakage	6 cfm per 100 sq. ft.
Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R	Duct Insulation	R-6 S / R-6 R
Duct Location	Cond / Attic	Duct Location	Cond / Attic	Duct Location	Cond / Attic
Infiltration	7 ACH 50	Infiltration	7 ACH 50	Infiltration	7 ACH 50
Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes	Mechanical Fresh Air	Yes
Lights & Appliances		Lights & Appliances		Lights & Appliances	
Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr	Refrigerator	691 kWh/yr
Dishwasher	.68 EF	Dishwasher	.68 EF	Dishwasher	.68 EF
Ceiling Fan	NA	Ceiling Fan	NA	Ceiling Fan	NA
CFL	80%	CFL	60%	CFL	80%
Energy Star		Energy Star		Energy Star	
HERS Score	70	HERS Score	70	HERS Score	67

STEARNS WEAVER MILLER
WEISSLER ALHADEFF & SITTERSON, P.A.

Patricia K. Green
150 West Flagler Street, Suite 2200
Miami, FL 33130
Direct: (305) 789-3345
Fax: (305) 789-2621
Email: pgreen@stearnsweaver.com

August 20, 2013

Via FedEx


Della Harrell
Corporation Clerk
Florida Housing Finance Corporation
227 N. Bronough St.
Suite 5000
Tallahassee, FL 32301

RE: Petition for Rule Waiver

Dear Ms. Harrell:

Enclosed is a Petition for Rule Waiver, submitted on behalf of Village Square Family, Ltd., for consideration by the Board at its next meeting. I have sent a duplicate copy to the Joint Administrative Procedures Committee. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Patricia K. Green

PKG/zs
Enclosures

RECEIVED
13 AUG 21 AM 9:40
FLORIDA HOUSING
FINANCE CORPORATION

#3063994 v1
40899 0001 Ltr to D. Harrell transmitting Petition 8.20.2013