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FLORIDA HOUSING
FINANCE CORPORATION

BEFORE THE STATE OF FLORIDA
FLORIDA HOUSING FINANCE CORPORATION

NOTRE MAISON I, LLLP,

Petitioner,

vs.

FHFC Case No. 2021-027BP

FHFC RFA No. 2021-103

Petitioner's Application No. 2021-298CS

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

_____ /

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

Pursuant to Sections 120.569 and 120.57, Fla. Stat., and Florida Housing Finance Corporation Request for Application (“RFA”) No. 2021-103, at Section Six, and Rules 28-106.205 and 67-60.009, Fla. Admin. Code, Petitioner Notre Maison I, LLLP, (“Petitioner”), an applicant for funding in RFA No. 2021-103 for Housing Credit and SAIL Financing for Homeless Housing Developments, hereby files its formal written protest to contest the proposed eligibility and scoring decisions and award of funding in RFA 2021-103. In support of this Protest and Petition, Petitioner states as follows:

Parties

1. The agency affected is the Florida Housing Finance Corporation (the “Corporation”, “Florida Housing,” or “FHFC”), whose address is 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329. The solicitation number assigned to this process for the award of Low-Income Housing Tax Credit (“Housing Credit”) and State Apartment Incentive Loan (“SAIL”) funding is Request for Applications (“RFA”) 2021-103. Nine applicants submitted applications for funding in response to this RFA. By notice posted on its website, FHFC has given

notice of its intent to award funding to two applicants, but not to Petitioner. FHFC also posted notice at the same time of its determinations of eligibility and scoring of the nine applications in this RFA. Seven of the nine applications, including Petitioner's application, were deemed eligible for consideration for funding. The posted notices also reflected the total points assigned to each application, and the points assigned for certain narrative portions of the applications, as discussed more fully in this petition.

2. Petitioner, Notre Maison I, LLLP, is a Florida limited liability limited partnership, whose business address is 1398 SW 1st Street, 12th Floor, Miami, Florida 33135. For purposes of this proceeding, Petitioner's address is that of its undersigned counsel, M. Christopher Bryant, Oertel, Fernandez, Bryant & Atkinson, P.A., P.O. Box 1110, Tallahassee, Florida 32302-1110, telephone number 850-521-0700, facsimile number 850-521-0720, email cbryant@ohfc.com.

3. Notre Maison's general partner is wholly owned and managed by Carrfour Supportive Housing, Inc., a not-for-profit organization that has 28 years' experience providing housing and supportive services to vulnerable populations in Miami-Dade County. Carrfour has developed nineteen affordable housing developments in Miami-Dade County, and is the sole Developer of Notre Maison. Carrfour is deeply embedded in all aspects of the Homeless Trust, Miami's Continuum of Care for services to homeless, and is the largest provider of supportive housing in Miami-Dade County. Carrfour, through its property management subsidiary Crossroads Management, LLC, currently manages 21 affordable housing developments in Miami-Dade County, consisting of over 1,500 housing units, providing housing for over 5,000 homeless men, women, and children.

4. Petitioner submitted an application, assigned Application No. 2021-298CS, in RFA 2021-103 seeking an award of total SAIL funding in the amount of \$5,131,500, and Competitive

(9%) Housing Credits in an annual amount of \$2,375,000. Petitioner proposes to construct a new 80-unit development in Miami-Dade County. At least 50% of the total number of units would be set aside for Homeless individuals and families, and at least 15% of the total units would be set aside for Persons with Special Needs.

Notice

5. On Friday, April 30, 2021, at approximately 10:25 a.m., Petitioner and the other applicants in RFA 2021-103 received notice that FHFC's Board of Directors had adopted FHFC staff's scoring and eligibility determinations for the applications submitted for funding; and selected two applications for the award of funding, subject to satisfactory completion of the credit underwriting process. Such notice was provided by the posting of two spreadsheets, one listing the eligible status and scoring of the applications in RFA 2021-103 (copy attached as Exhibit "A") and one identifying the applications which FHFC proposed to fund (copy attached as Exhibit "B") on the Florida Housing website, www.floridahousing.org. Petitioner timely filed a Notice of Protest on Wednesday, May 5, 2021, copy attached to this Petition as Exhibit "C." Petitioner's Formal Written Protest and Petition for Formal Administrative Proceedings is being filed within 10 calendar days of that notice; the tenth day fell on Saturday, May 15, 2021, so by operation of Rule 28-106.103, Fla. Admin. Code, the filing deadline was extended to Monday, May 17, 2021.

Substantial Interests Affected

6. Petitioner's substantial interests are being determined in the instant proceeding because Petitioner is an applicant for Housing Credit and SAIL funding. Petitioner was not preliminarily selected for an award of funding. Petitioner cannot proceed with the construction of its proposed development without the award of the requested funding.

Factual Background

RFA 2021-103 Ranking and Selection Process

7. Through the RFA 2021-103 process, FHFC seeks to award up to an estimated \$4,075,000 in Competitive Housing Credits and \$12,792,500 in SAIL financing for the construction or rehabilitation of affordable housing developments to serve Homeless individuals and households.

8. Applicants in this RFA were to be scored on a 155-point scale. Applicants could receive five (5) points each in four areas, as follows:

- Including a Principal Disclosure Form that was approved by the Corporation (or submitted for such approval) at least 14 days before the March 10, 2021 Application Deadline.
- Bookmarking Attachments to the Application prior to submission.
- No Principal identified in the Application having been a Developer, Co-Developer, or Principal or a Developer of an Application that was withdrawn from certain prior designated RFA's.
- No existing Development which shares Principals with the Applicant or Developer increased rent during the period March 8, 2020, through July 8, 2020.

9. The remaining 135 points were to be awarded for narrative portions of the applications that were to be subjectively scored by Florida Housing staff, with the maximum points available as follows:

- Section C.1.: Experience of the Applicant or Management Company in operating and managing permanent Supportive Housing (“Operating

Experience”) – up to 40 points

- Section C.2.a.: Tenant Access to Community-Based General Services, such as shopping, public schools, education, training, and employment, and transportation (“Access to General Services”) – up to 20 points
- Section C.2.b.: Tenant Access to Community-based Services and Resources to address tenant needs, such as healthcare and supportive services (“Access to Resources”) – up to 35 points
- Section C.3.a.: Assisting Tenants in Achieving Permanent Housing Stability Goals (“Housing Stability”) – up to 10 points
- Section C.3.b.: Assist Tenants in Achieving Self-Sufficiency Goals (“Self Sufficiency”) – up to 10 points
- Section C.4.: Applicant’s Involvement in Local Homeless Resources Network (“Network”) – up to 20 points

The total possible points an applicant could receive for all portions of the application was 155.

Application Submission and Processing

10. Florida Housing received nine Applications seeking funding in RFA 2021-103. The applications were received, processed, deemed eligible or ineligible, scored, and ranked, presumably pursuant to the terms of RFA 2020-104; and FHFC Rule Chapters 67-48 and 67-60, Fla. Admin. Code. Applications are considered for funding only if they are deemed “eligible,” based on whether the Application complies with Florida Housing’s various application content requirements. Seven of the nine applications were deemed eligible.

11. The total scores assigned to the seven eligible applications, in order of descending score, were as follows:

2021-294CSN	Alto Tower/Miami-Dade	147
2021-298CS	Notre Maison/Miami-Dade	143
2021-296CSN	Village at Cedar Hills/Duval	139
2021-293CSN	Orchid Lake/Broward	127
2021-291CS	Osprey Landing/Miami-Dade	122
2021-292CS	John Lewis Gardens/Miami-Dade	122
2021-295CSN	Melrose Park Estates/Miami-Dade	120

A spreadsheet produced by Florida Housing staff during detailing the scores assigned to each applicant for each scored item is attached as Exhibit D.

12. The RFA established a funding selection order, with the first applicant selected to be the highest ranking eligible applicant from either the North or South Region that qualifies for a Non-Profit Goal. See, RFA at p. 66. (All seven of the eligible applications could satisfy the Non-Profit Goal.) Of the three counties represented by eligible applications, Miami-Dade County is in the South Region, Duval is in the North Region, and Brevard County is in the Central Region.

13. The RFA specifies an “Application Sorting Order” to rank applicants for potential funding. The first consideration in sorting eligible applications for potential funding is Application scores. As noted, in paragraph 10, based on the total scores amended, other steps in the sorting order are, at this point, irrelevant.

14. In many RFAs, multiple applicants will achieve tie scores, and in anticipation of that occurrence FHFC designed the RFA and rules to incorporate a series of “tie-breakers.” (Tie scores are very rare in RFAs such as RFA 2021-103, where applicants are scored on the narrative content of the applications.) The first tie-breakers in this RFA is the points awarded for Operating/Managing Experience. If Alto Tower and Notre Maison achieved tied total scores, but the scores assigned for Operating and Management Experience remained the same, Notre Maison would be selected as its score on this criterion (38) exceeded Alto Tower’s score.

15. FHFC employs a “Funding Test” to be used in the selection of applications for

funding in this RFA. The “Funding Test” requires that the amount of Housing Credit and SAIL funding remaining (unawarded) when a particular application is being considered for selection must be enough to fully fund that applicant’s Housing Credit and SAIL request amounts. After selection of either Alto Tower or Notre Maison for funding, there would only be \$1,700,000 in Housing Credit funding remaining, and Orchid Lake is the only eligible application that could be fully funded with that amount of Housing Credit.

16. FHFC also applies a “County Award Tally” to prevent a disproportionate concentration of funded developments in any one county. The eligible applications in this RFA consisted of five applications from Miami-Dade (including both Alto Tower and Notre Maison), and one each from Brevard and Duval Counties.

17. Since the first factor in ranking applications is application score, Application 2021-294CSN, Alto Tower, with a score of 147 was selected first. After selection of Alto Tower, which requested \$2.375 million in Housing Credits, only \$1.7 million in Housing Credits remained. The only eligible application which could be funded with the remaining \$1.7 million was 2021-293CSN, Orchid Lake, in Brevard County. Petitioner does not challenge the scoring, ranking, or funding selection of the Orchid Lake application.

18. The review committee’s scoring determinations and recommendation to select Alto Tower and Orchid Lake for funding were presented to the Florida Housing Board of Directors at its April 30, 2021 meeting. The Board adopted the review committee’s scoring and award recommendations.

Eligibility Issue – False Statements in Application

19. As is required of all Applicants, Alto Tower included an executed Applicant Certification and Acknowledgement form with its completed application. The Application

Certification form states, in part:

21. The undersigned is authorized to bind the Applicant entity to this certification and warranty of truthfulness and completeness of the Application.

(emphasis added) The Form is signed by Shawn Wilson as the Authorized Principal Representative.

20. Contrary to the “warranty” in the Applicant Certification form, the Alto Tower form is not truthful. Specifically, the Application contains false statements regarding Alto Tower’s Applicant and Developer’s partnerships with persons and organizations who are significantly involved with services and programs for homeless persons in Miami-Dade County. In fact, any relationships between Alto Tower and these Miami-Dade organizations were minimal, not developed, or non-existent as of the Application Deadline.

21. The Alto Tower application states that Community Assisted and Supported Living, Inc. (CASL) and Blue Sky Communities, the principal entities that make up the Applicant, “are actively integrated within the local homeless resource network and together in partnership with The Homeless Trust, Thriving Mind, the City of Miami, and Judge Steven Leifman, an unparalleled knowledge of Miami-Dade County’s homeless and disabling condition needs will be jointly addressed.” Alto Tower application, p. 32 of 34. To the best of Petitioner’s knowledge, on reasonable inquiry and investigation, CASL, which is the non-profit provider relied on by Alto Tower as the entity with supportive services experience, is based in Sarasota and is active primarily in southwest and central Florida. CASL has very limited experience with housing for homeless populations, and has no existing network or direct experience in Miami-Dade County.

22. As noted, the Alto Tower application specifically claims a partnership with Judge Steven Leifman. Judge Leifman is a Judge of the Eleventh Judicial Circuit, in Miami-Dade

County. Judge Leifman has championed a jail diversion program for adults with mental illness, and is regarded as an expert in the field of mental health and the judicial system. Mental health issues are a substantial contributing factor to homelessness.

23. Contrary to Alto Tower's statement, Judge Leifman specifically denies any relationship with Blue Sky and CASL. See the May 5, 2021 letter from the Office of the General Counsel for the Eleventh Circuit to Marisa Button and Bill Aldinger, copy attached as Exhibit E to this Petition.

24. Likewise, on page 33 of the Alto Tower's application, the Applicant states that "CASL also has an existing relationship with Judge Steven Leifman. . . which will serve as a key relationship for addressing the most critical housing needs for a portion of our residents." Again, looking at the May 5 letter: "Judge Leifman objects to these statements as untrue, denies the existence of an 'existing relationship' between him and Blue Sky, CASL or [CASL CEO] Scott Eller." Judge Leifman further is unfamiliar with the involvement of Mr. Eller, Blue Sky, or CASL in the Continuum of Care housing network in Miami-Dade County.

25. The Homeless Trust is also identified as an entity with whom Alto Tower has an existing partnership. The Homeless Trust is the local Continuum of Care (CoC) for Miami-Dade County. At page 2 of 34, Alto Tower states it has "an agreement and working relationship with the CoC." Similar statements are made on pages 32 and 33, alleging "existing collaborative partnership" with the CoC.

26. These statements are not true. Based on recent inquiries to the Homeless Trust by Carrfour, there was no existing partnership or collaborative relationship with Alto Tower or CASL as of the Application Deadline.

27. Alto Tower further claims an "existing relationship" and "partnership" with

Thriving Mind. See pages 23-24 of the Alto Tower application. Thriving Mind is the Managing Entity for behavioral health services in Miami. It is an important institution in Miami-Dade County. Alto Tower also states that “supportive services will be paid through a grant agreement CASL receives from Thriving Mind,” page 24 of Alto Tower application. Based on recent inquiries by Carrfour, the President and CEO of Thriving Mind denies the existence of any partnership with Alto Tower, and denies that any funding commitments have been made to Alto Tower. “Funding Commitments” by Thriving Mind to support services providers are by no means automatic, and it can literally take years of repeated requests to Thriving Mind to obtain such funding.

28. In addition to these narrative sections of the Alto Tower application that respond to scored sections, Alto Tower included a two page introductory narrative at pages 2 and 3 of its application. This portion of the application is supposed to “describe the Homeless and Persons with Special Needs population (5) to be served.” See, RFA at page 9-10. The RFA states that, “This information will be considered by the Corporation when reviewing and scoring how the proposed access to community-based services will assist the intended residents.”

29. In responding to this writing prompt, Alto Tower again identifies the CoC and Thriving Mind. Alto Tower claims:

“Through our collaborative partnership, CASL, Thriving Mind . . . and the CoC . . . will ensure that homeless individuals . . . are prioritized . . .”

“CASL is pleased to say, an existing relationship is in place and funding through Thriving Mind will occur once Alto Tower is selected for funding.”

See, page 2 of 34 of the Alto Tower application.

30. Upon information and belief, few substantive discussions had taken place with the CoC or Thriving Mind as of the Florida Housing Application Deadline. Further, there was and is

no “collaborative partnership” or “existing relationship” with Thriving Mind or the CoC. Thriving Mind had made no commitment to Alto Tower or its partners to provide funding.

31. Notre Maison and its principals understand that in the narrative section of a subjectively scored application, an applicant must present its proposed development, and the services it will offer, in the most favorable light possible in order to maximize the score. There is a difference, though, between “puffery” and falsehood. Florida Housing rightfully treats material misrepresentations in applications very seriously; material misrepresentations can serve as the basis for disqualifying Applicants and their Principals from participation in Florida Housing programs. See, Rule 67-48.004(2), Fla. Admin. Code. Alto Tower has crossed the line between “puffery” and material misrepresentation, and its application should be deemed ineligible for violation of the warranty of truthfulness in its Application Certification and Acknowledgement form.

Scoring Issue

32. The false statements contained in the narrative sections of the Alto Tower application, even if they don’t result in outright rejection of the Alto Tower application, should at least warrant loss of points for sections of the application which contained materially false statements. As noted in paragraphs 22-30 above, false statements were included in the Alto Tower narrative section specifically in response to:

- Section C.2.b., Access to community-based services and resources that address tenants’ needs. Alto Tower received 34 out of 35 possible points, the same score as Notre Maison. Other applicants received scores ranging from 17 to 33.
- Section C.4. Involvement in the Local Homeless resources network. Alto Tower received 19 out of 20 possible points. Notre Maison received 17. Other

applicants received scores ranging from 7 to 16.

33. The points awarded by the review committee to Alto Tower and Notre Maison were as follows:

	294CSN, Alto Tower	298CS, Notre Maison
Bookmarking Attachments Prior to Submission (5)	5	0
Development Experience Withdrawal Disincentive (5)	5	5
Emergency Rent Freeze Rule 67ER 20-1 Disincentive (5)	5	5
Principal Disclosure Form (5)	5	5
Sec. C.1., "Operating Experience" (40)	37	38
Sec. C.2.a., "Access to General Services" (20)	19	19
Sec. C.2.b., "Access to Resources" (35)	34	34
Sec. C.3.a., "Housing Stability" (10)	9	10
Sec. C.3.b., "Self Sufficiency" (10)	9	10
Sec. C.4., "Network" (20)	19	17
Total (155)	147	143

34. The section of the Alto Tower application which was most enhanced by false statements was the response to Section C.4., Applicant's Involvement in Local Homeless Resource Network. According to the RFA, at page 59-60 of 135, an applicant's response to this section should include the following:

Describe how the Applicant is and/or will be involved in the local homeless resources network to gain a full understanding of the community's homelessness issues and housing needs. Such network may include one or both of the following: 1) The local Continuum of Care and its member agencies; and 2) Departments of the local government, particularly its social services department, but other departments such as housing and community development.

* * *

Whether or not the Applicant has been already embedded in and working with the local homeless community before proposing this Development, describe how the Applicant is now collaborating with local community and stakeholders that have the expertise to ensure the property is meeting local homeless needs both in the short term and over many years.

(Emphasis added.)

35. Alto Tower stated that its component entities, Blue Sky and CASL, “are actively integrated within the local homeless resource network.” See, page 32 of 34 of the Alto Towers application. While there may have been a few brief preliminary discussions by Alto Tower’s principals with The Homeless Trust and Thriving Mind in preparation for submission of this specific application, that does not by any stretch of the imagination constitute being “actively integrated.” That statement is simply untrue.

36. Likewise, Alto Tower states that it had “existing collaborative partnerships with local stakeholders like the COC, Thriving Mind of South Florida,” and others. No such collaborative partnerships existed with those two named entities as of the Application Deadline. As a result of all of these false statements regarding partnerships and relationships with these organizations, and with Judge Leifman, it should receive zero of the available 20 points for the “Network” criterion.

37. Alto Tower’s response to Section C.2.b., “Access to Resources,” was also enhanced by false statements. In responding to this section, applicants were to address three main topics,

including a discussion of:

The nature of any partnerships with the Local Homeless Assistance Continuum of Care lead agency as well as other relevant linkages with lead agencies or service providers that are key to helping the intended households maintain stability in the community.

See, RFA at page 58.

38. Petitioner has addressed in paragraphs 26 and 27 just some of the false statements contained in Alto Tower's response, regarding non-existent "relationships" and "partnerships." Alto Tower also stated that supportive services "will be paid through a grant agreement CASL receives from Thriving Mind," when in fact no such grant agreements are either in place or committed to by Thriving Mind.

39. Because of the falsehoods in Alto Tower's discussion of its "partnerships" with lead agencies, and specifically with the CoC and Thriving Mind as well as falsely claiming an agreement for funding from Thriving Mind, it should receive zero points for this section of the application. Alternatively, its score should be significantly reduced based on the false statements.

Disputed Issues

40. Petitioner has initially identified the following disputed issues of material fact, which it reserves the right to supplement as additional facts become known to it:

- a. Whether the Alto Tower application contained false statements in its narrative sections, particularly regarding relationships, partnerships, or agreements between Alto Tower and its Principals, and The Homeless Trust, Thriving Mind, and Judge Steve Leifman. Petitioner contends that it did.
- b. Whether the false statements in the Alto Tower application constitute a breach of the warranty of truthfulness in the Applicant Certification and Acknowledgment form. Petitioner contends that they do, and that the Alto

Tower application should be deemed ineligible.

- c. Whether Alto Tower's false statements in response to Section C.2.b. should result in Alto Tower receiving a score of zero for that section. Petitioner contends that it should.
- d. Whether Alto Tower's false statements in response to Section C.4. should result in Alto Tower receiving a score of zero for that section. Petitioner contends that it should.
- e. Whether Alto Tower's false statements in response to Section C.2.b. should, at a minimum, cause that section of the application to be redacted and rescored. Petitioner contends that it should.
- f. Whether Alto Tower's false statements in response to Section C.4. should, at a minimum, cause that section of the application to be redacted and rescored. Petitioner contends that it should.

Concise Statement of Ultimate Facts, Relief Sought, and Entitlement to Relief

41. As its concise statement of ultimate fact, Petitioner asserts that Alto Tower should be deemed ineligible for containing materially false statements, and that the Notre Maison application should then be selected for funding as the highest scoring applicant in this RFA, instead of Alto Tower. Alternatively, Alto Tower should receive a score of zero for those sections of its application containing materially false statements, or Alto Tower being ineligible based on total score, either of which results in Notre Maison being the highest scoring eligible application. Alternatively, the Alto Tower application should have the false statements deleted from its application, and the resulting redacted application should be rescored, in which case Notre Maison contends that it should have a higher score than Alto Tower.

42. Petitioner seeks entry of recommended and final orders deeming Alto Tower's application ineligible, or rejecting the scoring of the Alto Tower application, either by reducing the scores for certain sections of the application to zero or ordering the rescoring of those sections. Petitioner ultimately seeks selection of its application for funding as the highest scoring eligible application. Petitioner is entitled to this relief by the terms and conditions of the FHFC's RFA; by FHFC Rule Chapters 67-48 and 67-60, Fla. Admin. Code; and by Chapters 120 and 420, Florida Statutes, including but not limited to Sections 120.569 and 120.57, Florida Statutes.

Request for Settlement Meeting

43. Pursuant to Section 120.57(3)(d), Fla. Stat., Petitioner requests an opportunity to meet with Florida Housing to resolve this matter by mutual agreement within seven business days after filing. Petitioner reserves the right to agree to extend the time for such a settlement meeting.

FILED AND SERVED this 17th day of May, 2021.

/s/ M. Christopher Bryant

M. CHRISTOPHER BRYANT
Florida Bar No. 434450
OERTEL, FERNANDEZ, BRYANT
& ATKINSON, P.A.
P.O. Box 1110
Tallahassee, Florida 32302-1110
Telephone: 850-521-0700
Telecopier: 850-521-0720
Primary: cbryant@ohfc.com
Secondary: bpetty@ohfc.com

Attorney for Petitioner Notre Maison I, LLLP

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that the original of the foregoing Formal Written Protest and Petition for Administrative Proceedings has been filed by e-mail with the Corporation Clerk, Florida Housing Finance Corporation, 227 North Bronough Street, Suite 5000, Tallahassee, Florida 32301-1329 (CorporationClerk@floridahousing.org), and a copy via e-mail to the following this 17th day of May, 2021:

Hugh Brown, General Counsel
Betty Zachem, Assistant General Counsel
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301-1329
Hugh.brown@floridahousing.org
Betty.zachem@floridahousing.org

/s/ M. Christopher Bryant _____

ATTORNEY

Exhibits to the Notre Maison I, LLLP Formal Protest

- A. Spreadsheet of Board-Approved Eligibility and Scoring Determinations in RFA 2021-103, posted April 30, 2021
- B. Spreadsheet of Board-Approved Funding Selections in RFA 2021-103, posted April 30, 2021
- C. Notre Maison's Notice of Protest, filed May 5, 2021
- D. RFA 2021-103 Scoring Sheet, generated by Florida Housing staff during application scoring and review
- E. May 5, 2021, letter from Office of General Counsel for Eleventh Circuit to Florida Housing on behalf of Judge Steven Leifman

RFA 2021-103 Board Approved Scoring Results

Application Number	Name of Development	County	Qualifies as a NP?	Region	County Size	Demographic	Total Units	Name of Principal Representative	Name of Developers	HC Request Amount	SAIL Request Amount	ELI Loan Request Amount	Total SAIL Request (SAIL plus ELI)	Eligible For Funding?	Total Points	Operating/ Managing Experience Points	Involvement in the Local Homeless Resources Network Points	Leveraging	Qualifying Financial Assistance Preference	Per Unit Construction Funding Preference	Florida Job Creation Preference	Lottery Number
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Eligible Applications

2021-291CS	Osprey Landing	Miami-Dade	Y	South	L	50% Homeless	80	Daniel F. Acosta	ACRUVA Community Developers, LLC; ADC	2,375,000	4,595,650	535,400	5,131,050	Y	122	35	10	\$ 324,633.13	Y	Y	Y	4
2021-292CS	John Lewis Gardens	Miami-Dade	Y	South	L	50% Homeless	80	Daniel F. Acosta	ACRUVA Community Developers, LLC; ADC Communities II, LLC	2,375,000	4,651,950	479,100	5,131,050	Y	122	35	10	\$ 325,336.88	N	Y	Y	5
2021-293CSN	Orchid Lake	Brevard	Y	Central	M	50% Homeless	90	Matthew A. Rieger	HTG Orchid Lake Developer, LLC; Housing for Homeless, Inc.	1,700,000	4,751,050	380,000	5,131,050	Y	127	34	10	\$ 222,789.44	Y	Y	Y	6
2021-294CSN	Alto Tower	Miami-Dade	Y	South	L	50% Homeless	84	Shawn Wilson	Blue Sky Developer, LLC; CASL Developer, LLC	2,375,000	4,600,000	459,600	5,059,600	Y	147	37	19	\$ 309,226.19	N	Y	Y	7
2021-295CSN	Melrose Park Estates	Miami-Dade	Y	South	L	50% Homeless	84	David O. Deutch	Pinnacle Communities, LLC; CH Melrose, LLC	2,375,000	4,651,950	479,100	5,131,050	Y	120	32	11	\$ 309,844.64	N	Y	Y	1
2021-296CSN	Village at Cedar Hills	Duval	Y	North	L	50% Homeless	128	Shannon L. Nazworth	Ability Housing, Inc.	2,375,000	4,531,050	600,000	5,131,050	Y	139	36	15	\$ 202,391.02	N	Y	Y	3
2021-298CS	Notre Maison	Miami-Dade	Y	South	L	50% Homeless	80	Stephanie Berman	Carrfour Supportive Housing, Inc.	2,375,000	4,651,950	479,100	5,131,050	Y	143	38	17	\$ 361,485.42	Y	Y	Y	8

Ineligible Applications

2021-290CS	Brentwood Village	Volusia	Y	North	M	50% Homeless	84	William Schneider	Turnstone Development Corporation; Clermont Ridge II Developer, LLC	1,700,000	4,859,250	271,800	5,131,050	N	97	32	7	\$ 239,991.07	Y	Y	Y	2
2021-297CS	Vincetian Village	Pinellas	Y	Tampa Bay	L	50% Homeless	73	Shannon L. Nazworth	Ability Housing, Inc.	2,375,000	4,926,150	204,900	5,131,050	N	135	36	16	\$ 360,289.73	N	Y	Y	9

On April 30, 2021, 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.

RFA 2021-103 Board Approved Preliminary Awards

Total HC Available for RFA	4,075,000
Total HC Allocated	4,075,000
Total HC Remaining	-

Total SAIL Available for RFA	12,792,500
Total SAIL Allocated	10,190,650.00
Total SAIL Remaining	2,601,850

NHTF Funding will be 100% allocated in accordance with Exhibit I

Application Number	Name of Development	County	NP Applicant?	Region	County Size	Demographic	Total Units	Name of Principal Representative	Name of Developers	HC Request Amount	Total SAIL Request (SAIL plus ELI)	Eligible For Funding?	Total Points	Operating/ Managing Experience Points	Involvement in the Local Homeless Resources Network Points	Leveraging	Qualifying Financial Assistance Preference	Per Unit Construction Funding Preference	Florida Job Creation Preference	Lottery Number
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2021-294CSN	Alto Tower	Miami-Dade	Y	South	L	50% Homeless	84	Shawn Wilson	Blue Sky Developer, LLC; CASL Developer, LLC	2,375,000	5,059,600	Y	147	37	19	\$ 309,226.19	N	Y	Y	7
2021-293CSN	Orchid Lake	Brevard	Y	Central	M	50% Homeless	90	Matthew A. Rieger	HTG Orchid Lake Developer, LLC; Housing for Homeless, Inc.	1,700,000	5,131,050	Y	127	34	10	\$ 222,789.44	Y	Y	Y	6

On April 30, 2021, 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.



GARY J. COHEN
 PARTNER
 Shutts & Bowen LLP
 200 South Biscayne Boulevard
 Suite 4100
 Miami, Florida 33131
 DIRECT (305) 347-7308
 FAX (305) 347-7808
 EMAIL gcohen@shutts.com

RECEIVED

May 5, 2021

MAY 5 2021 9:55 AM

Florida Housing Finance Corporation
 Corporation Clerk
 227 N. Bronough Street, Ste. 500
 Tallahassee, FL 32301

FLORIDA HOUSING
 FINANCE CORPORATION

**Re: Notice of Intent to Protest; RFA 2021-103 Housing Credit and SAIL
 Financing For Homeless Persons**

Ladies and Gentlemen:

Pursuant to Section 120.57(3), Florida Statutes, Rule 28-110.003 and Rule 67-60.009, Florida Administrative Code, Applicant No. 2021-298CS Notre Maison I, LLLP files this Notice of Intent to Protest. This Notice is being filed within 72 hours (not including weekends and holidays) of the posting of the FHFC Board Approved Preliminary Awards and Board Approved Scoring Results with respect to RFA 2021-103 posted on FHFC's website on April 30, 2021 at 10:25 a.m. A copy of the Board's Preliminary Awards and Scoring Results, as posted on the FHFC's website, is attached to this notice as Exhibit "A". Notre Maison I, LLLP reserves the right to file a formal written protest within ten (10) days of the filing of this Notice pursuant to Section 120.57(3) Florida Statutes.

Sincerely,


 Gary J. Cohen

GJC/vxg

MIADOCS 22193582 1

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Exhibit "A"

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[Home \(/home\)](#) / [PROGRAMS \(/PROGRAMS\)](#)
[Multifamily Programs \(/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS\)](#) / Competitive

OVERVIEW ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/))

2021

2020 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2020/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2020/))

2019 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2019/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2019/))

2018 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2018/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2018/))

2017 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2017/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2017/))

2016 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2016/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2016/))

2015 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2015/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2015/))

2014 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2014/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2014/))

2013 ([PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2013/](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2013/))

CWHL ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2021/CWHL](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/cwhl))

2021-208 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2021/2021-208](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-208))

2021-205 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2021/2021-205](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-205))

2021-203 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2021/2021-203](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-203))

2021-202 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2021/2021-202](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-202))

2021-201 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-P-PROGRAMS/COMPETITIVE/2021/2021-201](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-201))

2021-106 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2021/2021-106](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-106))

2021-105 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2021/2021-105](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-105))

2021-104 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2021/2021-104](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-104))

2021-103

2021-102 ([HTTPS://WWW.FLORIDAHOUSING.ORG/PROGRAMS/DEVELOPERS-MULTIFAMILY-PROGRAMS/COMPETITIVE/2021/2021-102](https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/2021/2021-102))

RFA 2021-103 Housing Credit And SAIL Financing To Develop Housing For Homeless Persons

Board Approved Preliminary Awards/Notice of Intended Decision (posted April 30, 2021 at 10:25 a.m.)

Received Applications (Excel) (https://www.floridahousing.org/docs/default-source/urgent/competitive/2021/2021-103/2021-103-hc-homeless-apps.pdf?sfvrsn=d3a8f7b_0)

RFA 2021-103 Board Approved Preliminary Awards

Total HC Available for RFA	4,075,000
Total HC Allocated	4,075,000
Total HC Remaining	
Total SAIL Available for RFA	12,792,500
Total SAIL Allocated	10,190,850.00
Total SAIL Remaining	2,601,650

NHIF Funding will be 100% allocated in accordance with DSHHS

Application Number	Name of Development	County	NP Applicant?	Region	County Size	Demographic	Total Units	Name of Principal Representative	Name of Developer	HC Request Amount	Total SAIL Request (incl. SLD)	Eligible For Funding?	Total Points	Operating/Managing Experience Points	No. award in the total homeless resources Network Points	Leasehold	Qualifying Florida Assistance Performance	Per Unit Construction Funding Preference	Florida Job Creation Preference	Lottery Number
2021-25423H	White Tower	Miami-Dade	Y	South	L	50% Homeless	84	David Wilson	Blue Sky Developer, LLC, CASI Developer, LLC	2,375,000	2,058,800	Y	162	27	10	\$ 200,023.19	M	Y	Y	7
2021-25423H	Orlando Lake	Orlando	Y	Central	M	50% Homeless	90	Matthew A. Rieger	HTO Orchard Lake Developer, LLC, Housing for Homeless, Inc.	1,300,000	1,181,050	Y	127	34	30	\$ 102,289.44	Y	Y	Y	6

On April 30, 2021, the Board of Directors of Florida Housing Finance Corporation approved the Review Committee's motion to select the above Applications for funding and to let the Applicants to enter into an awarding

Any unsuccessful Applicant may file a motion of protest and a formal written protest in accordance with Section 320.57(2), Fla. Stat., Rule Chapter 39-110, F.A.C., and Rule 9A-60.000, F.A.C. Failure to file a protest within the time prescribed in Section 320.57(2), Fla. Stat., shall constitute a waiver of proceedings under Chapter 320, Fla. Stat.

Scoring Items	Contributor/ Reporter	2021-290CS	2021-291CS	2021-292CS	2021-293CSN	2021-294CSN	2021-295CSN	2021-296CSN	2021-297CS	2021-298CS	COUNT
		Brewwood Village	Dupuy Landing	John Lewis Gardens	Orchid Lake	Alto Tower	Melrose Park Estates	Village at Cedar Hills	Vincennes Village	Notre Maizon	
Points Items											
Bookmarking Attachments prior to submission (Section Three, A.2.b.1) (5 points)	Liz C.	5	5	5	5	5	5	5	5	0	1
3.c.(2)(b) Development Experience Withdrawal Disincentive (maximum of 5 points)	Mitch	5	5	5	5	5	5	5	5	5	0
3.b.(3)(c) 6/ER00-3 Disincentive (5 points)		5	5	5	5	5	5	5	5	5	0
3.c.(2) Submission of Principal Disclosure Form that is either (a) stamped "Approved" at least 14 Calendar Days prior to the Application Deadline; or (b) stamped "Received" by the Corporation at least 14 Calendar Days prior to the Application Deadline AND stamped "Approved" prior to the Application Deadline (maximum of 5 points)	Mitch	5	5	5	5	5	5	5	5	5	0
C.1. Operating/Managing Experience (maximum of 40 points)	Elaine	32	35	35	34	37	32	30	36	38	
C.2.a. Access to Community-Based General Services (maximum of 20 points)	Diana	13	16	15	17	19	14	17	15	19	
C.2.b. Access to Community-Based Services and Resources that Address Tenants' Needs (maximum of 35 points)		17	32	33	33	34	30	33	31	34	
C.3.a. Assist Intended Residents in Meeting their Housing Stability Needs, Goals and Expectations (maximum of 10 points)	Zeth	5	4	4	6	9	7	9	9	10	
C.3.b. Assist Intended Residents in Meeting their Self-Sufficiency Needs, Goals and Expectations (maximum of 10 points)		5	5	5	7	9	6	9	8	10	
C.4. Involvement in the Local Homeless Resources Network (maximum of 20 points)		7	10	10	10	19	11	15	16	17	
Total Points (maximum of 155 points)		69	122	122	123	147	136	129	125	143	
Eligibility Requirements											
Submission Requirements meet section Three, A.1		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
1. Applicant Certification and Acknowledgment form completed	Liz C.	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
2.a. Homeless Demographic Commitment attached		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
2.b. At least one Persons with Special Needs population selected		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
2.c. Demographic Commitment description completed		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.a.(1) Name of Applicant provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.a.(2) Evidence Applicant is a legally formed entity provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.a.(4) Documentation that the Applicant informed the jurisdiction's Local Continuum of Care lead agency head of its intent to apply for funding to develop housing pursuant to this RFA provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.b.(1) Name of Each Developer provided	Mitch	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.b.(2) Evidence that each Developer entity is a legally formed entity provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.b.(3)(a) Developer Experience Requirement met		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.c.(1) Principals for Applicant and Developer(s) Disclosure Form provided and meets requirements		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.d. Name and contact information of Management Company provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
3.e.(1) Authorized Principal Representative provided and meets requirements		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
4.a.(1) Development Category selected		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
4.a.(2) Development Category Qualifying Credentials met		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
4.f. Development Team provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
5.a. County identified		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
5.b. Address of Development Site provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
5.c. Question whether a Scattered Sites Development proposed		Y	Y	Y	Y	Y	Y	N	Y	Y	1
5.d.(1) Development Location Point provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
5.d.(2) Latitude and Longitude Coordinates for any Scattered Sites provided, if applicable		Y	Y	Y	Y	Y	Y	N	Y	Y	1
6.a. Total Number of Units provided and within limits	Liz C.	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
6.b. Number of new construction units and rehabilitation units provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
6.d.(1) Minimum Set-aside election completed		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
6.d.(2) Total Set-Aside Breakdown Chart correctly completed		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
6.e. Unit Mix provided and meets requirements		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
6.f. Number of residential buildings provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
7.a. Evidence of Site Control provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
7.b.(1) Appropriate Zoning demonstrated		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
7.b.(2) Availability of Water demonstrated		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
7.b.(3) Availability of Sewer demonstrated		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
8.d. Green Building Certification or minimum Additional Green Building Features selected, as applicable	Y	Y	Y	Y	Y	Y	Y	Y	Y	0	
10.a.(1) Applicant's Housing Credit Request Amount provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
10.a.(2) Applicant's SAIL Request Amount provided		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
10.c. Development Cost Pro Forma provided (bidding expenses or fees) and Construction/Rehab analysis and Permanent analysis (bidding sources) – Sources must equal or exceed 100%	Matt	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Total Development Cost Per Unit Limitation met (Section Five, A.1.)		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Verification of no prior acceptance to an invitation to enter credit underwriting for the same Development in a previous RFA (Section Five, A.1.)	Liz T.	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Verification of no recent de-obligations (Section Five, A.1.)		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Financial Arrang Met (Section Five, A.1.)	Kenny	Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Minimum Total Score of 100 points is met?	Yes or No	M	Y	Y	Y	Y	Y	Y	Y	Y	1
All Eligibility Requirements Met?	Yes or No	N	Y	Y	Y	Y	Y	Y	M	Y	2
Tie-Breakers											
10.d. Qualifying Financial Assistance Funding Preference	Matt	Y	Y	M	Y	M	N	M	N	Y	5
10.e. Per Unit Construction Funding Preference		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Florida Job Creation Preference (Item 3, of Exhibit C)		Y	Y	Y	Y	Y	Y	Y	Y	Y	0
Lottery Number	Inspector General	2	4	5	6	7	1	3	9	8	
Goals											
3.a.(3) Qualifies as a Non-Profit Applicant?	Mitch	Y	Y	Y	Y	Y	Y	Y	Y	Y	9



ELEVENTH JUDICIAL CIRCUIT OF FLORIDA
ADMINISTRATIVE OFFICE OF THE COURTS
OFFICE OF THE GENERAL COUNSEL

BERTILA SOTO
CHIEF JUDGE
SANDRA M. LONERGAN
TRIAL COURT ADMINISTRATOR

LAWSON E. THOMAS COURTHOUSE CENTER
175 N.W. FIRST AVENUE
MIAMI, FLORIDA 33128
(305) 349-7165
(305) 349-7168

May 5, 2021

Marisa Button, Multifamily Programs
Bill Aldinger, Policy and Special Programs
Florida Housing Finance Corporation
227 North Bronough St., Suite 5000
Tallahassee, FL 32301

RE: HUD Continuum of Care (CoC) Grant to Blue Sky Communities (Blue Sky) and
Community Assisted and Supported Living, Inc. (CASL)

Dear Ms. Button and Mr. Aldinger:

On behalf of the Eleventh Judicial Circuit Court and Judge Steven Leifman, Associate Administrative Judge of the Criminal Division of the County Court, in and for Miami-Dade County, I write to correct inaccuracies made by Blue Sky and CASL in their joint application for a Continuum of Care (CoC) Program grant. In support of receiving a major housing assistance award, Blue Sky and CASL claimed they have an "existing relationship" with Judge Leifman in addressing housing assistance needs of Miami-Dade County residents. In particular, their application states:

1. "Blue Sky and CASL are actively integrated within the local homeless resource network and together in partnership with . . . Judge Steven Leifman, an unparalleled knowledge of Miami-Dade County's homeless and disabling condition needs will be jointly addressed."
2. "CASL also has an existing relationship with Judge Steven Leifman, Dade County court system which will serve as a key relationship for addressing the most critical housing needs for a portion of our residents. Scott Eller and Judge Leifman have collaborated on Statewide Housing Panels on the topic of supportive housing."

Judge Leifman objects to these statements as untrue, denies the existence of an "existing relationship" between him and Blue Sky, CASL or Scott Eller, and is unfamiliar with involvement

Ms. Button and Mr. Aldinger

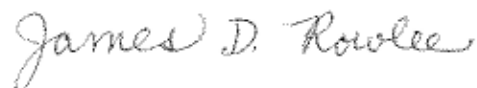
May 5, 2021

Page 2

by Mr. Eller, Blue Sky, or CASL in the CoC housing network in Miami-Dade County. At no time did Mr. Eller, Blue Sky, or CASL request permission to use Judge Leifman's name, reputation, and standing in the community in support of applying for and obtaining a CoC grant, nor did they circulate their statements to Judge Leifman for review and feedback before submission to HUD.

This correspondence is solely intended to clarify the record regarding CASL's and Blue Sky's relationship with the Eleventh Judicial Circuit Court and Judge Leifman. If you have any questions, please contact Pat Gladson, General Counsel, at 305-349-7165.

Sincerely,



James D. Rowlee
Senior Court Legal Advisor

Patricia L. Gladson
General Counsel

cc: Hon. Bertila Soto, Chief Judge, Eleventh Judicial Circuit
Steven Leifman, Associate Administrative Judge, County Criminal Division
Victoria Mallette, Executive Director -Homeless Trust