

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

TURNSTONE EUSTIS, LP

Petitioner,

vs.

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent.

FHFC Case # 2020-016BP

RFA No. 2019-113

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

Petitioner, TURNSTONE EUSTIS, LP ("Turnstone"), pursuant to sections 120.57(3), Florida Statutes ("F.S."), and Rules 28-110 and 67-60, Florida Administrative Code ("FAC") hereby files this Formal Written Protest and Petition for Administrative Hearing regarding the review, ranking, scoring and eligibility decisions of Respondent, FLORIDA HOUSING FINANCE CORPORATION ("Florida Housing") in awarding funding pursuant to Request for Application 2019-113 Housing Credit Financing For Affordable Housing Developments Located In Medium And Small Counties (the "RFA"). In support Turnstone provides as follows:

1. Turnstone is a Florida limited liability corporation in the business of providing affordable housing. Turnstone is located at 10 S. LaSalle Street, Suite 3510, Chicago, IL 60603.
2. Florida Housing is the allocating agency for the State of Florida that was granted the authority to issue the RFA for the purpose of construction, redevelopment, or rehabilitation of much needed affordable housing. Florida Housing's address is 227 North Bronough Street, Suite 500, Tallahassee, Florida 32301.
3. On August 20, 2019, Florida Housing issued the RFA which offered funding as follows:

SECTION ONE INTRODUCTION

This Request for Applications (RFA) is open to Applicants proposing the development of affordable, multifamily housing located in the Medium and Small Counties listed in Section Four A.5.a. of the RFA.

Under this RFA, Florida Housing Finance Corporation (the Corporation) expects to have (i) up to an estimated \$14,805,028 of Housing Credits available for award to proposed Developments that are located in Medium Counties and (ii) up to an estimated \$1,413,414 of Housing Credits available for award to proposed Developments that are located in Small Counties.

The Corporation is soliciting applications from qualified Applicants that commit to provide housing in accordance with the terms and conditions of this RFA, inclusive of all Exhibits, applicable laws, rules and regulations, and the Corporation's generally applicable construction and financial standards.

4. Through the issuance of the RFA, Florida Housing sought to solicit proposals from qualified applicants that would provide affordable housing consistent with the terms and conditions of the RFA, applicable laws, rules, and regulations.

5. On or before November 5, 2019, Turnstone submitted its Application in response to the RFA that included information concerning the development of a 55 unit complex in Columbia County, Florida, named Oakleaf Villas.

6. Through the Application, Turnstone was requesting funding in the amount of \$891,504 in low income housing tax credits to supplement the construction of affordable housing. Florida Housing received 184 applications in response to the RFA.

7. As the owner and developer of a project seeking funding through the RFA, Turnstone is substantially affected by the review, scoring, and ranking of the responses to the RFA. The results of this proceeding as well as others that may be filed affects Turnstone's ability to obtain funding through the RFA. Consistent with the primary mission and goal of the RFA,

Turnstone seeks to provide much needed affordable housing in Columbia County. Without the funds provided by the RFA, Turnstone will be unable to provide this much needed housing. Accordingly, Turnstone's substantial interests are affected by the decisions made by Florida Housing.

8. On February 18, 2020, the designated Review Committee met and considered all Applications submitted in response to the RFA. At the meeting the Review Committee orally listed and manually input the scores for each section of the Application and ultimately made a recommendation to the Board of Directors of Florida Housing ("Board") for their consideration. The Review Committee consisted of Florida Housing staff. During the meeting, the Review Committee found Turnstone's application to be eligible. The Review Committee however did not award Turnstone Application funding instead the Committee recommended funding to the Weldon Crossings, L.L.C., Application #2020-335C ("Weldon").

9. On March 6, 2020, the Board accepted and approved the Review Committee's ranking and funding recommendation.

10. On March 11, 2020, Turnstone timely filed its Notice of Intent to Protest. This Formal Written Protest is being timely filed and Florida Housing has waived the bid protest bond requirement for the RFA. As a Developer of affordable housing in need of supplemental funding, Turnstone's substantial interests are affected by Florida Housing's decisions in this case and others to award funding pursuant to the RFA. In this action Turnstone challenges the eligibility determination made by Florida Housing as it relates to the Weldon Application. If successful in its challenge Turnstone will move into the funding range.

11. Turnstone challenges Weldon's Application as being ineligible for several reasons. Initially, Weldon has failed to provide an acceptable Management Company as required by the RFA. Next Weldon has failed to provide a correct address for its Development site. Next, Weldon

has provided site control documentation which is inconsistent with the requirements of the RFA. Lastly Weldon has failed to provide an acceptable Florida Housing Finance Corporation Verification of Availability of Infrastructure – Roads Form.

12. As to the first issue the RFA at Section Four (A)(3)(d) requires as an eligibility item an applicant to identify a Management Company and provide, as Attachment 5 to Exhibit A, a prior experience chart.

13. In response to the RFA requirement Weldon indicated that its Management Company was SPM, LLC. A review of the Florida Secretary of State's web page however reveals no such entity exists in Florida. In Florida, SPM, LLC, an Alabama LLC, is registered to do business as SPM of Alabama, LLC. If this Alabama LLC is indeed the proposed Management Company, Weldon has not provided the correct identity of its Management Company in violation of the requirements of the RFA. (See Exhibit A)

14. In addressing the address issue the RFA at Section Four (A)(5)(b) requires as an eligibility item that the address of the Development Site be provided and indicate (1) the address, number, street name and name of city, and/or (2) the street name, closest designated intersection, and either name of city or unincorporated area of county.

15. Weldon in its application indicated that its Development site location was

“West Weldon Street, west of the intersection of West Weldon Street and West Washington Street, Starke, Florida”

16. Based on a Google Map Search and confirmed by an on-site visit this location is erroneous. West Weldon Street does not intersect with West Washington Street in Starke, Florida. The closest intersection to the proposed development site is West Weldon Street and North Orange Street, Starke, Florida. Accordingly, Weldon has provided an incorrect address and Development Site location. Additionally, Weldon has submitted Attachments 9 through 13 in its application

using the same erroneous address. The Forms submitted as Attachments 9 through 13 are incorrect and should not be accepted as evidence of Weldon's Ability to Proceed. (See Exhibit B)

17. The RFA at Section Four (A)(7)(a) requires an applicant to demonstrate Readiness to Proceed, Site Control. One of the ways an applicant can demonstrate Site Control is by providing an eligible contract.

18. In response to this requirement Weldon submitted several documents at Attachment 8 of its Application. The documents include: a Contract for Purchase and Sale of Real Property indicating EIS Housing, LLC, as the "Buyer"; and an Assignment of Contract for Purchase and Sale of Real Property indicating EIS Housing, LLC, as the "Purchaser." These two documents clearly identify different capacities for EIS Housing, LLC which on the face of the document is an obvious inconsistency and error.

19. In addition, the Assignment is executed by Mr. Christopher M. Savino as **President** of EIS Housing, LLC; however Mr. Savino in the Principal Disclosure Form is identified as not the President of EIS Housing, LLC but the Manager. The Principal Disclosure Form submitted in the application does not list Mr. Savino as an officer of EIS Housing, LLC. This calls into question the correctness of the Principal Disclosure Form and the Site Control Verification Form also signed by Mr. Savino. (See Exhibit C)

20. The RFA at Section Four (A)(7)(b)(5) requires an Applicant to demonstrate that as of the Application Deadline, paved roads either (i) exist and will provide access to the proposed Development Site or (ii) will be constructed as part of the proposed Development by providing at Attachment 13 a properly executed Florida Housing Finance Corporation Verification of Availability of Infrastructure – Roads Form.

21. In response to this RFA requirement Weldon submitted with its Application a Roads Form signed by Mr. Bob Miller, City Manager for the City of Starke. The road which

provides access to the Development Site however is within the jurisdiction of Bradford County (County Road 229) and not the City of Starke. Accordingly, the Form submitted by Weldon is not executed properly by the appropriate service provider. Accordingly, the Form is not acceptable and Weldon has not passed threshold and should be deemed ineligible. (See Road Form at Exhibit B)

22. Turnstone reserves the right to amend this Petition as necessary.

23. Material Issues in Dispute

- a. Whether Florida Housing's review and actions taken concerning the Weldon's Application in response to the RFA was arbitrary or capricious, clearly erroneous or contrary to competition.
- b. Whether the review of the Weldon's Application was inconsistent with the RFA requirements.

WHEREFORE, Turnstone requests that a settlement meeting be scheduled and to the extent no settlement is reached a hearing scheduled and ultimately the entry of a Recommended and Final Order determining that Florida Housing's review and scoring of applications was contrary to the RFA specifications and to Florida Housing's governing statutes, rules and policies to such an extent as to be arbitrary, capricious, contrary to competition, and clearly erroneous and awarding funding to Turnstone.

Respectfully submitted,

CARLTON, FIELDS

/s/ Michael P. Donaldson

MICHAEL P. DONALDSON

Florida Bar No. 0802761

Post Office Drawer 190

215 S. Monroe St., Suite 500

Tallahassee, Florida 32302

Telephone: 850/224-1585

Facsimile: 850/222-0398

Email: mdonaldson@carltonfields.com

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, FL 32301, this 20th day of March 2020.

/s/ Michael P. Donaldson
MICHAEL P. DONALDSON

**APPLICATION BY FOREIGN LIMITED LIABILITY COMPANY FOR AUTHORIZATION TO
TRANSACTION BUSINESS IN FLORIDA**

IN COMPLIANCE WITH SECTION 608.503, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED TO REGISTER A FOREIGN LIMITED LIABILITY COMPANY TO TRANSACT BUSINESS IN THE STATE OF FLORIDA.

1. SPM, LLC
(Name of Foreign Limited Liability Company, must include "Limited Liability Company," "L.L.C.," or "LLC.")

SPM of Alabama, LLC
(If name unavailable, enter alternate name adopted for the purpose of transacting business in Florida and attach a copy of the written consent of the managers or managing members adopting the alternate name. The alternate name must include "Limited Liability Company," "L.L.C.," "LLC.")

2. Alabama 3. 63-1042087
(Jurisdiction under the law of which foreign limited liability company is organized) (FEI number, if applicable)

4. December 15, 2008 5. Perpetual
(Date of Organization) (Duration: Year limited liability company will cease to exist or "perpetual")

6. December 15, 2008
(Date first transacted business in Florida, if prior to registration)
(See sections 608.501 & 608.502 F.S. to determine penalty liability)

7. 1103 Richard Arrington, Jr. Blvd. South
Birmingham, AL 35205
(Street Address of Principal Office)

8. If limited liability company is a manager-managed company, check here

9. The name and usual business addresses of the managing members or managers are as follows:
Robert C. Field 1103 Richard Arrington, Jr. Blvd. South, Birmingham, AL 35205
William B Welden
Charles V. Welden, III
William Edgar Welden, Jr.

10. Attached is an original certificate of existence, no more than 90 days old, duly authenticated by the official having custody of records in the jurisdiction under the law of which it is organized. (A photocopy is not acceptable. If the certificate is in a foreign language, a translation of the certificate under oath of the translator must be submitted.)

11. Nature of business or purposes to be conducted or promoted in Florida: real estate
management

W B Welden
Signature of a member or an authorized representative of a member.
(In accordance with section 608.403(3), F.S., the execution of this document constitutes an affidavit on, under the penalties of perjury that the facts stated herein are true.)
William B Welden
Typed or printed name of signee

FILED
2008 MAY -5 AM 11:56
TALLAHASSEE

**CERTIFICATE OF DESIGNATION OF
REGISTERED AGENT/REGISTERED OFFICE**

PURSUANT TO THE PROVISIONS OF SECTION 608.415 or 608.507, FLORIDA STATUTES, THE
UNDERSIGNED LIMITED LIABILITY COMPANY SUBMITS THE FOLLOWING STATEMENT
TO DESIGNATE A REGISTERED OFFICE AND REGISTERED AGENT IN THE STATE OF
FLORIDA.

1. The name of the Limited Liability Company is:

SPM, LLC

If name unavailable, the alternate name to be used in the state of Florida is:

SPM of Alabama, LLC

2. The name and the Florida street address of the registered agent and office are:

NRAI Services, Inc.
(Name)

2731 Executive Park Drive, Suite 4
Florida Street Address (P.O. Box **NOT** ALLOWABLE)

Weston, FL 33331
City/State/Zip

FILED
2009 MAY -5 AM 10:36
TALLAHASSEE, FLORIDA

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 608, Florida Statutes.

Wm B. Uebel
(Signature)

- \$ 100.00 Filing Fee for Application
- \$ 25.00 Designation of Registered Agent
- \$ 30.00 Certified Copy (optional)
- \$ 5.00 Certificate of Status (optional)



FLORIDA DEPARTMENT OF STATE
Division of Corporations

April 23, 2009

MICHELE PICARD
PO BOX 55465
BIRMINGHAM, AL 35255

SUBJECT: SPM, LLC
Ref. Number: W09000019166

We have received your document for SPM, LLC and your check(s) totaling \$130.00. However, the enclosed document has not been filed and is being returned for the following correction(s):

The name designated in your document is unavailable since it is the same as, or it is not distinguishable from the name of an existing entity. Section 608.406 Florida Statutes, was amended effective July 1, 2007, to require the name of a limited liability company to be distinguishable from the names of all other filings filed with the Division of Corporations, except for fictitious name registrations and general partnership registrations.

Please select a new name and make the correction in all the appropriate places. One or more words may be added to make the name distinguishable from the one presently on file. Adding of Florida or Florida to the end of the name is not acceptable. A search for name availability can be made on the Internet through the Division's records at www.sunbiz.org.

Please note the name of a limited liability company must end with the words Limited Liability Company, the abbreviation L.L.C., or the designation LLC. The word Limited may be abbreviated as Ltd. and the word Company may be abbreviated as Co. The following suffixes are no longer acceptable: Limited Company, L.C., and LC.

Please return your document, along with a copy of this letter, within 60 days or your filing will be considered abandoned.

If you have any questions concerning the filing of your document, please call (850) 245-6097.

Marsha Thomas
Regulatory Specialist II

Letter Number: 809A00013673

2009 MAY -5 AM 10:36
FILED

2019 FOREIGN LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# MC9000001675

Entity Name: SPM OF ALABAMA, LLC

Current Principal Place of Business:

913 S. PARSONS AVE., SUITE A
BRANDON FL 33511

FILED
Mar 27, 2019
Secretary of State
0175754292CC

Current Mailing Address:

ATTN: GLENDA LOVE
P. O. BOX 55485
BIRMINGHAM, AL 35255 US

FEI Number: 63-1042087

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

NRA SERVICES INC
1200 SOUTH PINE ISLAND ROAD
PLANTATION, FL 33324 US

The above named entity submits this statement for the purpose of changing its registered chief or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent Date

Authorized Person(s) Detail :

Title	MGRM	Title	MGRM
Name	FIFLD, ROBERT G	Name	WELDEN, WILLIAM B
Address	1103 RICHARD ARRINGTON, JR BLVD. SOUTH	Address	1103 RICHARD ARRINGTON, JR BLVD SOUTH
City-State-Zip	BIRMINGHAM AL 35205	City-State-Zip:	BIRMINGHAM AL 35205
Title	MGRM	Title	MGRM
Name	WELDEN, CHARLES W III	Name	WELDEN, WILLIAM E JR.
Address	1103 RICHARD ARRINGTON, JR BLVD. SOUTH	Address	1103 RICHARD ARRINGTON, JR BLVD. SOUTH
City-State-Zip	BIRMINGHAM AL 35205	City-State-Zip:	BIRMINGHAM AL 35205
Title	MGRM	Title	VP
Name	WINCH, STEPHEN E	Name	RUSSELL, CHARLOTTE
Address	1103 RICHARD ARRINGTON, JR BLVD. SOUTH	Address	913 SOUTH PARSONS AVENUE SUITE A
City-State-Zip:	BIRMINGHAM AL 35205	City State Zip:	BRANDON FL 33511

I hereby certify that the information stated on this report or supplemental report is true and accurate and that my electronic signature also bears the same legal effect as if made in ink. I am a managing member or manager of the limited liability company or the member or member authorized to execute this report as reported by Chapter 885, Florida Statutes, and not my name appears above, or an authorized agent of the company.

SIGNATURE: WILLIAM B. WELDEN MGR MEMBER 03/27/2019

Electronic Signature of Signing Authorized Person(s) Detail Date

Beth Chapman
Secretary of State

P.O. Box 5616
Montgomery, AL 36143-5616

STATE OF ALABAMA

I, Beth Chapman, Secretary of State of the State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that

the domestic corporate records on file in this office disclose that SPM, LLC organized in the office of the Judge of Probate of Jefferson County on December 15, 2008. I further certify that the records do not disclose that said SPM, LLC has been dissolved.



In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the City of Montgomery, on this day.

April 10, 2009

Date

Beth Chapman

Beth Chapman

Secretary of State

Date Submitted: 2019-11-30 08:36:43.363 | Form Key: 5639

Note: If an Applicant selects the Development Category of Rehabilitation, with or without Acquisition, and either (i) does not answer this question or (ii) selects "Yes" as the answer to this question, the Application will NOT qualify for the Development Category Funding Preference.

c. Select the Development Type

Garden Apartments ✓

For purposes of the A/B Leveraging Classification calculation, if the Development Type of Mid-Rise, 5 – 6 stories is selected, are at least 90 percent of the total units in these Mid-Rise building(s)?

Choose an item.

d. Enhance Structural Systems ("ESS") Construction Qualifications

Does the proposed Development meet the requirements to be considered ESS Construction as outlined in Section Four A.4.d. of the R-AP?

Yes

5. Location of proposed Development

a. County: Bradford

b. Location of Development Site

West Weldon Street, West of Line Intersection of West Weldon Street and West Washington Street, Starke, FL

c. Does the proposed Development consist of Scattered Sites?

No

d. Latitude and Longitude Coordinates

(1) Development Location Point

Latitude in decimal degrees, rounded to at least the sixth decimal place
29.953864

Longitude in decimal degrees, rounded to at least the sixth decimal place
-82.119350

(2) If the proposed Development consists of Scattered Sites, for each Scattered Site that is in addition to the Development Location Point information provided in (1) above, identify the latitude and longitude coordinates, rounded to at least the sixth decimal place:

Date Submitted: 2019-10-30 08:36:43.363 | Form Key: 5609

Attachment 9

Date Submitted: 2019-10-30 08:36:43 363 Form Key: 5609

**FLORIDA HOUSING FINANCE CORPORATION
LOCAL GOVERNMENT VERIFICATION THAT DEVELOPMENT IS
CONSISTENT WITH ZONING AND LAND USE REGULATIONS**

Name of Development: Weldon Crossings

West Weldon Street, West of the intersection of West Weldon Street and West Washington Street,

Development Location: Starks, FL

(At a minimum, provide the address number, street name and city, and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). The location of all scattered sites, if applicable, must also be included.

Number of Units in the Development: 90

This number must be equal to or greater than the number of units stated by the Applicant in Exhibit A of the REA

The undersigned service provider confirms that, as of the date that this form was signed, the above referenced Development's proposed number of units, density, and intended use are consistent with current land use regulations and zoning designation or, if the Development consists of rehabilitation, the intended use is allowed as a legally non-conforming use. To the best of my knowledge, there are no hearings or approvals required to obtain the appropriate zoning classification. Assuming compliance with the applicable land use regulations, there are no known conditions that would preclude construction or rehabilitation of the referenced Development on the proposed site.

CERTIFICATION

I certify that the City/County of Starks _____ has vested in me the authority to verify
(Name of City/County)

consistency with local land use regulations and zoning designation or, if the Development consists of rehabilitation, the intended use is allowed as a "legally non-conforming use" and I further certify that the foregoing information is true and correct. In addition, if the proposed Development site is in the Florida Keys Area as defined in Rule Chapter 67-48, F.A.C., I further certify that the Applicant has obtained the necessary Rate of Growth Ordinance (ROGO) allocations from the Local Government.

Bob Milner
Signature

Bob Milner
Print or Type Name

10/04/19
Date Signed

City Manager
Print or Type Title

This verification must be signed by the applicable City's or County's Director of Planning and Zoning, appointed official (staff) responsible for determination of issues related to comprehensive planning and zoning, City Manager, or County Manager/Administrator/Coordinator. Signatures from local elected officials are not acceptable, nor are other signatories. If there are alterations made to this form that change the meaning of the form, the form will not be accepted.

(Form Rev. 8-16)

Date Submitted: 2019-10-30 08:36:43.353 | Form Key: 5609

Attachment 10

Date Submitted: 2019-10-30 08:36:43 363 Form Key: 5609

**FLORIDA HOUSING FINANCE CORPORATION
VERIFICATION OF AVAILABILITY OF INFRASTRUCTURE - ELECTRICITY**

Name of Development: Weldon Crossings

West Weldon Street, West of the Intersection of West Weldon Street and West Washington Street.

Development Location: Stucke, FL

At a minimum, provide the address number, street name and city and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). The location of all Scattered Sites, if applicable, must also be included.

The undersigned service provider certifies that, as of the date that this form was signed, the above referenced Development Location met the following:

1. Electricity is available to the proposed Development, subject to item 2 below.
2. To access such electric service, the Applicant may be required to pay hook-up, installation and other customary fees, comply with other routine administrative procedures, and install or construct line extensions and other equipment in connection with the construction of the Development.

CERTIFICATION

I certify that the foregoing information is true and correct.

Bob Milner
Signature

City of Stucke
Name of Entity Providing Service

Bob Milner
Print or Type Name

26939 Thompson Street
Address (street address, city, state)

City Manager
Print or Type Title

Stucke, FL 32091

10/04/19
Date Signed

904.368.1333
Telephone Number (including area code)

This certification may not be signed by the Applicant, by any related parties of the Applicant, or by any Principals or Financial Beneficiaries of the Applicant. In addition, signatures from local elected officials are not acceptable. If there are alterations made to this form that change the meaning of the form, the form will not be accepted.

(Form Rev. 8-18)

Date Submitted: 2019-10-30 08:36:43.163 | Project Key: 5609

Attachment

11

Date Submitted: 2019-10-30 08:36:43.363 | Form Key: 5609

**FLORIDA HOUSING FINANCE CORPORATION
VERIFICATION OF AVAILABILITY OF INFRASTRUCTURE - WATER**

Name of Development: Weldon Crossings

West Weldon Street, West of the Intersection of West Weldon Street and West Washington Street.

Development Location: Stark, FL
At a minimum, provide the address number, street name and city and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). The location of all Scattered Sites, if applicable, must also be included.

Number of Units in the Development: 90
This number must be equal to or greater than the number of units stated by the Applicant in Exhibit A of the RFA.

The undersigned service provider certifies that, as of the date that this form was signed, the above referenced Development Location met the following:

1. Potable water is available to the proposed Development, subject to item 2 below.
2. To access such water service, the Applicant may be required to pay hook-up, installation and other customary fees, comply with other routine administrative procedures, provide encasements, and remove, relocate, install or construct line extensions and other equipment, including but not limited to pumping stations, in connection with the construction of the Development. Execution of this document does not guarantee that water service will be available to the Applicant in the future and does not provide the Applicant with any vested rights to receive water service. The availability of water services is subject to the approval of all applicable governmental agencies having jurisdiction over these matters.

CERTIFICATION

I certify that the foregoing information is true and correct.

Bob Milner
Signature

City of Stark
Name of Entity Providing Service

Bob Milner
Print or Type Name

209 N Thompson Street
Address (street address, city, state)

City Manager
Print or Type Title

Stark, FL 32091

10/04/19
Date Signed

904.368.1333
Telephone Number (including area code)

This certification may not be signed by the Applicant, by any related parties of the Applicant, or by any Principals or Financial Beneficiaries of the Applicant. In addition, signatures from local elected officials are not acceptable. If there are alterations made to this form that change the meaning of the form, the form will not be accepted.

Date Submitted: 2019-10-30 08:36:43.363 | Form Key: 5609

Attachment 12

Date Submitted: 2019-10-30 08:36:43.363 | Form Key: 5609

**FLORIDA HOUSING FINANCE CORPORATION
VERIFICATION OF AVAILABILITY OF INFRASTRUCTURE –
SEWER CAPACITY, PACKAGE TREATMENT, OR SEPTIC TANK**

Name of Development: Weldon Crossings
West Weldon Street, West of the Intersection of West Weldon Street and West Washington Street.

Development Location: Starks, FL
At a minimum, provide the address number, street name and city and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). The location of all Scattered Sites, if applicable, must also be included.

Number of Units in the Development: 50
This number must be equal to or greater than the number of units stated by the Applicant in Exhibit A of the RFA.

The undersigned service provider confirms that, as of the date that this form was signed, the above referenced Development Location met the following:

1. Sewer Capacity or Package Treatment is available to the proposed Development, or
2. There are no known prohibitions to installing a Septic Tank system with adequate capacity for the proposed Development location or, if necessary, upgrading an existing Septic Tank system with adequate capacity for the proposed Development location.

To access such waste treatment service, the Applicant may be required to pay hook-up, installation and other customary fees, comply with other routine administrative procedures, provide assessments, and/or remove, relocate, install or construct line extensions and other equipment, including but not limited to pumping stations, in connection with the construction of the Development. Execution of this document does not guarantee that waste treatment service will be available to the Applicant in the future and does not provide the Applicant with any vested rights to receive waste treatment service. The availability of waste treatment services is subject to the approval of all applicable governmental agencies having jurisdiction over these matters.

For projects located within Miami-Dade County, the Applicant is advised that the right to consume the referenced property to the Department's sewer system is subject to the terms, covenants and conditions set forth in court orders, judgments, consent orders, consent decrees and the like entered into between the County and the United States, the State of Florida, and/or any other governmental entity, including the Consent Decree entered on April 9, 2014, in the United States of America, State of Florida and State of Florida Department of Environmental Protection v. Miami-Dade County, Case No. 1:12-cv-23400-PAM, as well as all other current, subsequent or future enforcement and regulatory actions and proceedings.

CERTIFICATION

I certify that the foregoing information is true and correct:

Bob Milner
Signature

City of Starks
Name of Entity Providing Service

Bob Milner
Print or Type Name

209 N Thompson Street
Address (street address, city, state)

City Manager
Print or Type Title

Starks, FL 32091

10/04/19
Date Signed

904.368.1333
Telephone Number (including area code)

This certification may not be signed by the Applicant, by any related parties of the Applicant or by any Principals or Financial Beneficiaries of the Applicant. In addition, signatures from local tiered officials are not acceptable. If there are alterations made to this form that change the meaning of the form, the form will not be accepted.
(Form Rev. 8-18)

Date Submitted: 2019-10-30 08:36:43.363 Form Key: 5609

Attachment 13

Date Submitted: 2019-10-30 08:36:43.563 Form Key: 5609

**FLORIDA HOUSING FINANCE CORPORATION
VERIFICATION OF AVAILABILITY OF INFRASTRUCTURE - ROADS**

Name of Development: Weldon Crossings

West Weldon Street, West of the Intersection of West Weldon Street and West Washington Street.

Development Location: Stark, FL

At a minimum, provide the address number, street name and city and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). The location of all scattered sites, if applicable, must also be included.

The undersigned service provider confirms that, as of the date that this form was signed, the above referenced Development Location met the following:

1. Existing paved roads provide access to the proposed Development or paved roads will be constructed as part of the proposed Development;
2. There are no impediments to the proposed Development using the roads other than payment of impact fees or providing curb cuts, turn lanes, signalization, or securing required final approvals and permits for the proposed Development; and
3. The execution of this verification is not a granting of traffic concurrency approval for the proposed Development.

CERTIFICATION

I certify that the foregoing information is true and correct.

Bob Milnes
Signature

City of Stark
Name of Entity Providing Service

Bob Milnes
Print or Type Name

209 N Thompson Street

City Manager
Print or Type Title

Stark, FL 32091
Address (street address, city, state)

10/04/19
Date Signed

904.368.1333
Telephone Number (including area code)

This certification may not be signed by the Applicant, by any related parties of the Applicant, or by any Principals or Financial Beneficiaries of the Applicant. In addition, signatures from local elected officials are not acceptable. If there are alterations made to this form that change the meaning of the form, the form will not be accepted.

(Form Rev. 8/18)

Date Submitted: 2019-10-30 08:36:43.353 ; Form Key 3609

ASSIGNMENT OF CONTRACT FOR PURCHASE AND SALE OF REAL PROPERTY

THIS ASSIGNMENT OF CONTRACT FOR PURCHASE AND SALE OF REAL PROPERTY (this "Assignment") is made this 15 day of October, 2019 (the "Effective Date") by **EIS HOUSING, LLC**, a Florida limited liability company ("Assignor") and **WELDON CROSSINGS, LLC**, a Florida limited liability company ("Assignee").

WHEREAS, Assignor as "Purchaser" entered into that certain Contract for Purchase and Sale of Real Property dated August 10, 2019, as amended, by that First Addendum to Contract for Purchase and Sale of Real Property dated August 10, 2019 (the "Contract") with **Oakridge Forest Partners, LLC**, a Florida limited liability company ("Seller") for the purchase of the Property as defined therein; and

WHEREAS, Assignor desires to transfer and assign to Assignee all of Assignor's right, title, interest and obligations as "Purchaser" under the Contract except as to that portion of the Property comprising approximately 4.5 acres, more particularly described on Exhibit "A" (the "Assignment Property"); and

WHEREAS, Assignee agrees to assume all of Assignor's right, title, interest and obligations as "Purchaser" under the Contract as to the Assignment Property only;

NOW, THEREFORE, for good and valuable consideration, receipt of which is hereby acknowledged, Assignor does hereby grant, bargain, sell, convey, transfer and assign to Assignee, its successors and assigns, the Contract as to the Assignment Property, and any amendments thereto, and all of the right, title and interest of Assignor as "Purchaser" thereunder, including, but not by way of limitation, all right, title and interest of the Assignor in and to the funds of the "Purchaser" deposited as earnest money deposits, pursuant to the provisions of the Contract, to have and to hold the same unto Assignee, its heirs, personal representatives, successors and assigns forever. Assignee hereby accepts and assumes all of the right, title, interest and obligations of Assignor as "Purchaser" under the Contract as to the Assignment Property. The Assignor shall continue to retain all right, title, interest and obligations as "Purchaser" under the Contract as to the portion of the Property that does not comprise the Assignment Property. Assignee shall be responsible for payment of \$310,000.00 at Closing for the purchase of the Assignment Property.

IN WITNESS WHEREOF, this instrument is executed this 15th day of October, 2019.

Assignor:
EIS HOUSING, LLC,
a Florida limited liability company

By: [Signature]
Christopher M. Savino, President

Assignee:
WELDON CROSSINGS, LLC,
a Florida limited liability company

By: [Signature]
WELDON CROSSINGS MANAGER, LLC
a Florida limited liability company,
as its Manager

By: [Signature]
Name: Christopher M. Savino, President

Date Submitted: 2019-10-30 08:35:43.363 Form Key: 5635

CONTRACT FOR PURCHASE AND SALE OF REAL PROPERTY

This Contract for Purchase and Sale of Real Property (the "Contract") is made and entered into as of the Effective Date by and between Oakridge Forest Partners, LLC (the "Seller") and EIS HOUSING, LLC, or assigns (the "Buyer").

In consideration of the mutual agreements herein set forth, the parties hereto agree as follows:

1. Definitions. The following capitalized terms shall have the meanings given to them in this Section 1. Other capitalized terms when used in this Contract for Purchase and Sale shall have the meanings given to such terms in the Definitions Addendum attached hereto as Exhibit "B".
 - 1.1. Closing Date. Unless extended pursuant to this Section 1.1, the Closing shall take place on or before **March 31, 2020**. The Closing Date may be extended for one-month periods for up to nine (9) months; provided, however in no event shall the Closing Date be extended beyond December 31, 2020. Buyer may exercise its right to such extensions by delivery of notice to Seller and Escrow Agent on or before three (3) days prior to the scheduled Closing Date together with a payment of \$5,000 (each, an "Extension Payment") to Seller or Escrow Agent (as applicable), for each one-month extension. All Extension Payments will be non-refundable to the Buyer for any reason other than Seller's default under this Contract. The first three (3) Extension Payments shall be delivered to the Escrow Agent to hold in escrow with the Deposit. The first three (3) Extension Payments shall be credited towards the Purchase Price at Closing. All remaining Extension Payments shall be paid directly to Seller, and shall not be credited toward the Purchase Price at Closing.
 - 1.2. Deposit. The Initial Deposit and the Additional Deposit, together with all interest earned on said sum while it is held in escrow by Escrow Agent in accordance with this Contract.
 - 1.3. Effective Date. The date this Contract is executed by the last party to sign it and communication of such fact of execution to the other party.
 - 1.4. Escrow Agent. Mastdagh and Wall, P.A., 280 W Canton Ave Suite 110, Winter Park, FL 32789.
 - 1.5. Housing Credit Allocation. A final, non-appealable allocation of Low Income Housing Tax Credits, Multifamily Mortgage Revenue Bonds or similar Public Funds ("Housing Credits") from the Florida Housing Finance Corporation ("FHFC"), in an amount deemed sufficient by Buyer in its reasonable discretion, when combined with other available sources, to enable Buyer to construct the Buyer's Contemplated Improvements, together with a binding commitment for the sale or syndication of such Housing Credits.

86196273 v:
30264-0000

Date Submitted: 2019-10-30 08:36:43.363 | Form Key: 3609

Principal Disclosures for the Applicant

APPROVED for HOUSING CREDITS
FHFC Advance Review 10/31/19

Select the organizational structure for the Applicant entity:

The Applicant is a United Liability Company

Provide the name of the Applicant (United Liability Company):

Weldon Crossings, LLC

First Principal Disclosure Level:

Click the corresponding box to complete the table for the First Level Principal Disclosures for the Applicant.

First Level Entity #	Select Type of Principal Qualifier	Enter Name of First Level Principal	Select organizational structure of First Level Principal (dropdown)
1.	Manager	Weldon Crossings Manager, LLC	United Liability Company
2.	Non-Investor Member	Weldon Crossings Manager, LLC	United Liability Company
3.	Investor Member	FIS Housing, LLC	United Liability Company

Second Principal Disclosure Level:

Weldon Crossings, LLC

Click the corresponding box to complete the table for the Second Level Principal Disclosures for the Applicant.

Select the corresponding First Level Principal Entity # from above for which the Second Level Principal is being identified	Second Level Entity #	Select the type of Principal being associated with the corresponding First Level Principal Entity.	Enter Name of Second Level Principal	Select organizational structure of Second Level Principal (dropdown)
1. Weldon Crossings Manager, LLC	1.A.	Manager	FIS Housing, LLC	United Liability Company
1. Weldon Crossings Manager, LLC	1.B.	Member	FIS Housing, LLC	United Liability Company
1. Weldon Crossings Manager, LLC	1.C.	Member	Weldon Communities, Inc.	Non-Profit Corporation
2. Weldon Crossings Manager, LLC	2.A.	Manager	FIS Housing, LLC	United Liability Company
2. Weldon Crossings Manager, LLC	2.B.	Member	FIS Housing, LLC	United Liability Company
3. Weldon Crossings Manager, LLC	3.A.	Member	Weldon Communities, Inc.	Non-Profit Corporation

Third Principal Disclosure Level:

Weldon Crossings, LLC

Click the corresponding box to complete the table for the Third Level Principal Disclosures for the Applicant.

Select the corresponding Second Level Principal Entity # from above for which the Third Level Principal is being identified	Third Level Entity #	Select the type of Principal being associated with the corresponding Second Level Principal Entity.	Enter Name of Third Level Principal (dropdown either a Natural Person or LLC)	Select organizational structure of Third Level Principal (dropdown either a Natural Person or LLC)
1.A. FIS Housing, LLC	1.A.11	Sole Member	Sawin, Christopher	Natural Person
1.B. FIS Housing, LLC	1.B.11	Sole Member	Sawin, Christopher	Natural Person
1.C. FIS Housing, LLC	1.C.11	Sole Member	Sawin, Christopher	Natural Person
2.A. FIS Housing, LLC	2.A.11	Sole Member	Sawin, Christopher	Natural Person
2.B. FIS Housing, LLC	2.B.11	Executive Director	Meredith, Cynthia B.	Natural Person
2.C. Weldon Communities, Inc.	1.C.12	Officer/Director	Meredith, Cynthia B.	Natural Person
1.C. Weldon Communities, Inc.	1.C.13	Officer/Director	Straka, Christopher	Natural Person
1.C. Weldon Communities, Inc.	1.C.14	Officer/Director	Straka, June A.	Natural Person
2.C. FIS Housing, LLC	2.C.11	Executive Director	Meredith, Cynthia B.	Natural Person
2.C. FIS Housing, LLC	2.C.12	Officer/Director	Meredith, Cynthia B.	Natural Person
2.C. FIS Housing, LLC	2.C.13	Officer/Director	Straka, Christopher	Natural Person
2.C. FIS Housing, LLC	2.C.14	Officer/Director	Straka, June A.	Natural Person

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L19000248731
FILED 8:00 AM
October 03, 2019
Sec. Of State
msimmons

Article I

The name of the Limited Liability Company is:

WILDON CROSSINGS MANAGER LLC

Article II

The street address of the principal office of the Limited Liability Company is:

13252 LAKESHORE GROVE DR
WINTER GARDEN, FL. US 34787

The mailing address of the Limited Liability Company is:

13252 LAKESHORE GROVE DR
WINTER GARDEN, FL. US 34787

Article III

The name and Florida street address of the registered agent is:

CHRISTOPHER M SAVINO
13252 LAKESHORE GROVE DRIVE
WINTER GARDEN, FL. 34787

I having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: CHRISTOPHER M. SAVINO

Article IV

The name and address of person(s) authorized to manage LLC:

Title: MOR
EIS HOUSING LLC
7575 DR PHILLIPS BLVD, #390
ORLANDO, FL. 32819 US

L19000248731
FILED 8:00 AM
October 03, 2019
Sec. Of State
msimmons

Article V

The effective date for this Limited Liability Company shall be:

10/02/2019

Signature of member or an authorized representative

Electronic Signature: CHRISTOPHER M. SAVINO

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

2019 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L18000229269

Entity Name: EIS HOUSING, LLC

Current Principal Place of Business:

7575 DR PHILLIPS BLVD
#390
ORLANDO, FL 32819

FILED
Apr 23, 2019
Secretary of State
0400993223CC

Current Mailing Address:

7575 DR PHILLIPS BLVD
#390
ORLANDO, FL 32819 UN

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

EQUITY INVESTMENT SERVICES LLC
7575 DR PHILLIPS BLVD
#390
ORLANDO, FL 32819 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent or both in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title MGR
Name SAVINO, CHRISTOPHER M
Address 7575 DR PHILLIPS BLVD
City-State-Zip ORLANDO FL 32819

I hereby certify that the information furnished on this report is true and accurate and that I am an authorized officer, director, or manager of the limited liability company or the person or persons responsible for providing this report as required by Chapter 400, Florida Statutes, and that my name appears above, or on an attached affidavit, on this report.

SIGNATURE: CHRISTOPHER M. SAVINO

MGR

04/23/2019

Electronic Signature of Signing Authorized Person(s) Detail

Date

1109.00000 1675

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

PICK-UP WAIT MAIL

(Business Entity Name)

(Document Number)

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TALLAHASSEE, FLORIDA

M. THOMAS

MAY -6 2009

EXAMINER