

Bill No. CS for CS for SB 330

Amendment No. ____ Barcode 393122

CHAMBER ACTION

Senate

House

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Senator Bennett moved the following amendment:

Senate Amendment (with title amendment)

On page 17, between lines 10 and 11,

insert:

Section 5. Sections 5 through 19 of this act may be referred to by the popular name the "Florida Homeownership Act of 2004."

Section 6. Section 193.017, Florida Statutes, is created to read:

193.017 Low-income housing tax credit.--Property used for affordable housing which has received a low-income housing tax credit from the Florida Housing Finance Corporation, as authorized by s. 420.5099, shall be assessed under s. 193.011 and consistent with s. 420.5099(5) and (6), pursuant to this section.

(1) The tax credits and the financing generated by the tax credits may not be considered as income to the property.

(2) The actual rental income from rent-restricted units in such a property shall be recognized by the property

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1 appraiser.

2 (3) Any costs paid for by tax credits and costs paid
3 for by additional financing proceeds received under chapter
4 420 may not be included in the valuation of the property.

5 (4) If an extended low-income housing agreement is
6 filed in the official public records of the county in which
7 the property is located, the agreement and any recorded
8 amendment or supplement thereto shall be considered a land
9 use regulation and a limitation on the highest and best use of
10 the property during the term of the agreement, amendment, or
11 supplement.

12 Section 7. Paragraph (f) of subsection (6) of section
13 253.034, Florida Statutes, is amended to read:

14 253.034 State-owned lands; uses.--

15 (6) The Board of Trustees of the Internal Improvement
16 Trust Fund shall determine which lands, the title to which is
17 vested in the board, may be surplusd. For conservation lands,
18 the board shall make a determination that the lands are no
19 longer needed for conservation purposes and may dispose of
20 them by an affirmative vote of at least three members. In the
21 case of a land exchange involving the disposition of
22 conservation lands, the board must determine by an affirmative
23 vote of at least three members that the exchange will result
24 in a net positive conservation benefit. For all other lands,
25 the board shall make a determination that the lands are no
26 longer needed and may dispose of them by an affirmative vote
27 of at least three members.

28 (f) In reviewing lands owned by the board, the council
29 shall consider whether such lands would be more appropriately
30 owned or managed by the county or other unit of local
31 government in which the land is located. The council shall

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1 recommend to the board whether a sale, lease, or other
2 conveyance to a local government would be in the best
3 interests of the state and local government. The provisions of
4 this paragraph in no way limit the provisions of ss. 253.111
5 and 253.115. Such lands shall be offered to the state, county,
6 or local government for a period of 30 days. Permittable uses
7 for such surplus lands may include public schools; public
8 libraries; fire or law enforcement substations; ~~and~~
9 governmental, judicial, or recreational centers; and
10 affordable housing. County or local government requests for
11 surplus lands shall be expedited throughout the surplusing
12 process. If the county or local government does not elect to
13 purchase such lands in accordance with s. 253.111, then any
14 surplusing determination involving other governmental agencies
15 shall be made upon the board deciding the best public use of
16 the lands. Surplus properties in which governmental agencies
17 have expressed no interest shall then be available for sale on
18 the private market.

19 Section 8. Subsection (5) is added to section
20 420.0003, Florida Statutes, to read:

21 420.0003 State housing strategy.--

22 (5) HOUSING OPTIONS.--The affordable housing delivery
23 system shall provide for a variety of housing options as
24 appropriate, including, but not limited to, single family and
25 multifamily housing built according to chapter 553,
26 manufactured housing as defined in s. 320.01(2)(b), and
27 housing coordinated with services for special needs
28 populations.

29 Section 9. Subsection (2) and paragraph (a) of
30 subsection (22) of section 420.507, Florida Statutes, are
31 amended, and subsections (42), (43), and (44) are added to

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1 that section, to read:

2 420.507 Powers of the corporation.--The corporation
3 shall have all the powers necessary or convenient to carry out
4 and effectuate the purposes and provisions of this part,
5 including the following powers which are in addition to all
6 other powers granted by other provisions of this part:

7 (2) To undertake and carry out studies and analyses of
8 housing needs within the state and ways of meeting those
9 needs, to determine whether supplies of affordable housing in
10 various markets may exceed future demands.

11 (22) To develop and administer the State Apartment
12 Incentive Loan Program. In developing and administering that
13 program, the corporation may:

14 (a) Make first, second, and other subordinated
15 mortgage loans including variable or fixed rate loans subject
16 to contingent interest for all State Apartment Incentive Loans
17 provided for in this chapter based upon available cash flow of
18 the projects. The corporation shall make loans exceeding 25
19 percent of project cost available only to nonprofit
20 organizations and public bodies which are able to secure
21 grants, donations of land, or contributions from other sources
22 and to projects meeting the criteria of subparagraph 1.

23 Mortgage loans shall be made available at the following rates
24 of interest:

25 1. Zero to 3 percent interest for sponsors of projects
26 that set aside at least ~~maintain an~~ 80 percent ~~occupancy~~ of
27 their total units for residents qualifying as farmworkers as
28 defined in s. 420.503(18), or commercial fishing workers as
29 defined in s. 420.503(5), ~~or the homeless as defined in s.~~
30 ~~420.621(4)~~ over the life of the loan.

31 2. Zero to 3 percent interest for projects that set

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1 aside at least 80 percent of the project's total units for the
 2 homeless as defined in s. 420.621(4), provided the board may
 3 set the interest rate based on the pro rata share of units set
 4 aside for homeless residents if the total of such units is
 5 less than 80 percent of the units in the borrower's project.

6 ~~3.2.~~ Three to 9 percent interest for sponsors of
 7 projects targeted at populations other than farmworkers,
 8 commercial fishing workers, and the homeless.

9 (42) Establish procedures by rule whereby the
 10 corporation may intervene, negotiate terms, or undertake other
 11 actions which the corporation deems necessary to avoid default
 12 of a program loan. Such procedures must be fiscally
 13 responsible and designed to maximize returns to the state.

14 (43) To promote single family homeownership in this
 15 state and develop and implement a marketing plan in
 16 consultation with local governments and state and federal
 17 agencies that includes strategies such as advertising,
 18 homebuyer fairs, and homebuyer education.

19 (44) To establish by rule requirements for periodic
 20 reporting of data, including, but not limited to, financial
 21 data, housing market data, detailed economic and physical
 22 occupancy on multifamily projects, and demographic data on all
 23 housing financed through corporation programs.

24 Section 10. Subsection (8) is added to section
 25 420.508, Florida Statutes, to read:

26 420.508 Special powers; multifamily and single-family
 27 projects.--The corporation shall have the special power to:

28 (8) Provide by rule for master lease agreements for
 29 farmworker housing developments when and where appropriate to
 30 ensure continuity and stability of housing for farmworker
 31 populations.

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1 Section 11. Subsection (3) and paragraph (m) of
2 subsection (6) of section 420.5087, Florida Statutes, are
3 amended to read:

4 420.5087 State Apartment Incentive Loan
5 Program.--There is hereby created the State Apartment
6 Incentive Loan Program for the purpose of providing first,
7 second, or other subordinated mortgage loans or loan
8 guarantees to sponsors, including for-profit, nonprofit, and
9 public entities, to provide housing affordable to
10 very-low-income persons.

11 (3) During the first 6 months of loan or loan
12 guarantee availability, program funds shall be reserved for
13 use by sponsors who provide the housing set-aside required in
14 subsection (2) for the tenant groups designated in this
15 subsection. The reservation of funds to each of these groups
16 shall be determined using the most recent statewide
17 very-low-income rental housing market study available at the
18 time of publication of each notice of fund availability
19 required by paragraph (6)(b). The reservation of funds within
20 each notice of fund availability to the tenant groups in
21 paragraphs (a), (b), and (d) may not be less than 10 percent
22 of the funds available at that time. Any increase in funding
23 required to reach the 10-percent minimum shall be taken from
24 the tenant group that has the largest reservation. The
25 reservation of funds within each notice of fund availability
26 to the tenant group in paragraph (c) may not be less than 5
27 percent of the funds available at that time. The tenant groups
28 are:

29 (a) Commercial fishing workers and farmworkers;

30 (b) Families;

31 (c) Persons who are homeless; and

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1 (d) Elderly persons. Ten percent of the amount
2 reserved for the elderly shall be reserved to provide loans to
3 sponsors of housing for the elderly for the purpose of making
4 building preservation, health, or sanitation repairs or
5 improvements which are required by federal, state, or local
6 regulation or code, or lifesafety or security-related repairs
7 or improvements to such housing. Such a loan may not exceed
8 ~~\$500,000~~~~\$200,000~~ per housing community for the elderly. In
9 order to receive the loan, the sponsor of the housing
10 community must make a commitment to match at least 15 percent
11 of the loan amount to pay the cost of such repair or
12 improvement. The corporation shall establish the rate of
13 interest on the loan, which may not exceed 3 percent, and the
14 term of the loan, which may not exceed 15 years. The term of
15 the loan shall be established on the basis of a credit
16 analysis of the applicant. The corporation shall establish, by
17 rule, the procedure and criteria for receiving, evaluating,
18 and competitively ranking all applications for loans under
19 this paragraph. A loan application must include evidence of
20 the first mortgagee's having reviewed and approved the
21 sponsor's intent to apply for a loan. A nonprofit organization
22 or sponsor may not use the proceeds of the loan to pay for
23 administrative costs, routine maintenance, or new
24 construction.

25 (6) On all state apartment incentive loans, except
26 loans made to housing communities for the elderly to provide
27 for lifesafety, building preservation, health, sanitation, or
28 security-related repairs or improvements, the following
29 provisions shall apply:

30 (m) Sponsors shall ~~annually~~ certify, according to
31 requirements provided by the corporation by rule, the adjusted

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1 gross income of all persons or families qualified under
2 subsection (2) at the time of initial occupancy, who are
3 residing in a project funded by this program. All persons or
4 families qualified under subsection (2) may continue to
5 qualify under subsection (2) in a project funded by this
6 program if the adjusted gross income of those persons or
7 families at the time of annual recertification meets the
8 requirements established in s. 142(d)(3)(B) of the Internal
9 Revenue Code of 1986, as amended. If the annual
10 recertification of persons or families qualifying under
11 subsection (2) results in noncompliance with income occupancy
12 requirements, the next available unit must be rented to a
13 person or family qualifying under subsection (2) in order to
14 ensure continuing compliance of the project.

15 Section 12. Subsection (3) of section 420.511, Florida
16 Statutes, is amended to read:

17 420.511 Business plan; strategic plan; annual
18 report.--

19 (3) The corporation shall submit to the Governor and
20 the presiding officers of each house of the Legislature,
21 within 2 months after the end of its fiscal year, a complete
22 and detailed report setting forth:

23 (a) Its operations and accomplishments.†

24 (b) Changes made to the rules of the corporation
25 pursuant to s. 120.54.

26 (c)† Its receipts and expenditures during its fiscal
27 year in accordance with the categories or classifications
28 established by the corporation for its operating and capital
29 outlay purposes.†

30 (d)† Its assets and liabilities at the end of its
31 fiscal year and the status of reserve, special, or other

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1 funds.†

2 ~~(e)(d)~~ A schedule of its bonds outstanding at the end
3 of its fiscal year, together with a statement of the principal
4 amounts of bonds issued and redeemed during the fiscal year.†
5 ~~and~~

6 ~~(f)(e)~~ Information relating to the corporation's
7 activities in implementing the provisions of ss. 420.5087 and
8 420.5088. The report required by this subsection shall
9 include, but not be limited to:

10 1. The number of people served, delineated by income,
11 age, family size, and racial characteristics.

12 2. The number of units produced under each program.

13 3. The average cost of producing units under each
14 program.

15 4. The average sales price of single-family units
16 financed under s. 420.5088.

17 5. The average amount of rent charged based on unit
18 size on units financed under s. 420.5087.

19 6. The number of persons in rural communities served
20 under each program.

21 7. The number of farmworkers served under each
22 program.

23 8. The number of homeless persons served under each
24 program.

25 9. The number of elderly persons served under each
26 program.

27 10. The extent to which geographic distribution has
28 been achieved in accordance with the provisions of s.
29 420.5087.

30 11. Any other information the corporation deems
31 appropriate.

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1 (q) Information relating to the corporation's Florida
2 Affordable Housing Guarantee Program as created by s.
3 420.5092. The report required by this subsection shall
4 include, but not be limited to:

5 1. A status at the end of the most recently completed
6 fiscal year of the total amount of revenue bonds issued by the
7 corporation under s. 420.5092, the principal and interest due
8 on such bonds for the reporting period, the total amount of
9 such bonds redeemed during the reporting period, and the
10 interest earned by the investment of the funds from such
11 revenue bonds during the reporting period.

12 2. A list of all stabilized properties at the end of
13 the most recently completed fiscal year guaranteed by the
14 Florida Affordable Housing Guarantee Program, which includes
15 the city and county, the total number of units constructed,
16 the quarterly occupancy rates expressed as percentages for the
17 fiscal year, the total principal and interest due for the
18 fiscal year, the principal and interest paid for the fiscal
19 year, and the Florida Affordable Housing Guarantee Program's
20 total outstanding obligation at the end of the fiscal year.

21 Section 13. Paragraph (a) of subsection (1) of section
22 420.9072, Florida Statutes, is amended to read:

23 420.9072 State Housing Initiatives Partnership
24 Program.--The State Housing Initiatives Partnership Program is
25 created for the purpose of providing funds to counties and
26 eligible municipalities as an incentive for the creation of
27 local housing partnerships, to expand production of and
28 preserve affordable housing, to further the housing element of
29 the local government comprehensive plan specific to affordable
30 housing, and to increase housing-related employment.

31 (1)(a) In addition to the legislative findings set

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1 forth in s. 420.6015, the Legislature finds that affordable
2 housing is most effectively provided by combining available
3 public and private resources to conserve and improve existing
4 housing and provide new housing for very-low-income
5 households, low-income households, and moderate-income
6 households. The Legislature intends to encourage partnerships
7 in order to secure the benefits of cooperation by the public
8 and private sectors and to reduce the cost of housing for the
9 target group by effectively combining all available resources
10 and cost-saving measures. The Legislature further intends that
11 local governments achieve this combination of resources by
12 encouraging active partnerships between government, lenders,
13 builders and developers, real estate professionals, advocates
14 for low-income persons, and community groups to produce
15 affordable housing and provide related services. Extending the
16 partnership concept to encompass cooperative efforts among
17 small counties as defined in s. 120.52(17), and among counties
18 and municipalities is specifically encouraged. Local
19 governments are also intended to establish and retain an
20 affordable housing advisory committee to recommend monetary
21 and nonmonetary incentives for affordable housing as provided
22 in s. 420.9076.

23 Section 14. Subsection (2) of section 420.9076,
24 Florida Statutes, is amended, present subsections (3) through
25 (7) of that section are renumbered as subsections (4) through
26 (8), respectively, a new subsection (3) and subsection (9) are
27 added to that section, and paragraphs (k) and (l) are added to
28 present subsection (4) of that section, to read:

29 420.9076 Adoption of affordable housing incentive
30 strategies; committees.--

31 (2) The governing board of a county or municipality

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1 shall appoint the members of the affordable housing advisory
2 committee by resolution. Pursuant to the terms of any
3 interlocal agreement, a county and municipality may create and
4 jointly appoint an advisory committee to prepare a joint plan.
5 The ordinance adopted pursuant to s. 420.9072 which creates
6 the advisory committee or the resolution appointing the
7 advisory committee members must provide for a minimum of nine
8 committee members and their terms. The committee must include:

9 (a) One citizen who is actively engaged in the
10 residential home building industry in connection with
11 affordable housing.

12 (b) One citizen who is actively engaged in the banking
13 or mortgage banking industry in connection with affordable
14 housing.

15 (c) One citizen who is a representative of those areas
16 of labor actively engaged in home building in connection with
17 affordable housing.

18 (d) One citizen who is actively engaged as an advocate
19 for low-income persons in connection with affordable housing.

20 (e) One citizen who is actively engaged as a
21 for-profit provider of affordable housing.

22 (f) One citizen who is actively engaged as a
23 not-for-profit provider of affordable housing.

24 (g) One citizen who is actively engaged as a real
25 estate professional in connection with affordable housing.

26 (h) One citizen who actively serves on the local
27 planning agency pursuant to s. 163.3174.

28 (i) One citizen who resides within the jurisdiction of
29 the local governing body making the appointments.

30

31 Any additional committee members must be citizens within the

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1 jurisdiction of the local governing body making the
2 appointments. If a county or eligible municipality whether due
3 to its small size, the presence of a conflict of interest by
4 prospective appointees, or other reasonable factor, is unable
5 to appoint a citizen actively engaged in these activities in
6 connection with affordable housing, a citizen engaged in the
7 activity without regard to affordable housing may be
8 appointed.

9 (3) Each county or eligible municipality participating
10 in the State Housing Initiatives Partnership Program must
11 maintain an operational affordable housing advisory committee.

12 (5)(4) The advisory committee shall review the
13 established policies and procedures, ordinances, land
14 development regulations, and adopted local government
15 comprehensive plan of the appointing local government and
16 shall recommend specific initiatives to encourage or
17 facilitate affordable housing while protecting the ability of
18 the property to appreciate in value. Such recommendations may
19 include the modification or repeal of existing policies,
20 procedures, ordinances, regulations, or plan provisions; the
21 creation of exceptions applicable to affordable housing; or
22 the adoption of new policies, procedures, regulations,
23 ordinances, or plan provisions. At a minimum, each advisory
24 committee shall make recommendations on affordable housing
25 incentives in the following areas:

26 (k) The review of the housing element of the local
27 government comprehensive plan pursuant to chapter 163 and the
28 Local Housing Assistance Plan.

29 (l) Actions as liaison between local governing
30 councils and commissions and the general public.

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1 The advisory committee recommendations must also include other
 2 affordable housing incentives identified by the advisory
 3 committee.

4 (9) The advisory committee shall have a continuing
 5 function as an oversight committee for the implementation of
 6 the local housing assistance plan and incentive strategies.
 7 The advisory committee shall meet no less than annually to
 8 review the local housing assistance plan and incentive
 9 strategies to provide recommendations to the appointing local
 10 government in regard to its housing strategies and incentives.

11 Section 15. Subsection (2) of section 421.02, Florida
 12 Statutes, is amended to read:

13 421.02 Finding and declaration of necessity.--It is
 14 hereby declared that:

15 (2) Blighted Slum areas in the state cannot be
 16 revitalized ~~cleared~~, nor can the shortage of safe and sanitary
 17 dwellings for persons of low income be relieved, through the
 18 operation of private enterprise, ~~and that the construction of~~
 19 ~~housing projects for persons of low income, as herein defined,~~
 20 ~~would therefore not be competitive with private enterprise.~~

21 Section 16. Subsection (8) of section 421.08, Florida
 22 Statutes, is renumbered as subsection (10), and new
 23 subsections (8) and (9) are added to that section, to read:

24 421.08 Powers of authority.--An authority shall
 25 constitute a public body corporate and politic, exercising the
 26 public and essential governmental functions set forth in this
 27 chapter, and having all the powers necessary or convenient to
 28 carry out and effectuate the purpose and provisions of this
 29 chapter, including the following powers in addition to others
 30 herein granted:

31 (8) To create for-profit and non-for-profit

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1 corporations, limited liability companies, and such other
2 business entities pursuant to the laws of this state in which
3 housing authorities may hold an ownership interest or
4 participate in their governance to engage in the development,
5 acquisition, leasing, construction, rehabilitation,
6 management, or operation of multifamily and single-family
7 residential projects. These projects may include
8 nonresidential uses and may use public and private funds to
9 serve individuals or families who meet the applicable income
10 requirements of the state or federal program involved, whose
11 income does not exceed 150 percent of the applicable Area
12 Median Income as established by the United States Department
13 of Housing and Urban Development, and who, in the
14 determination of the housing authority, lack sufficient income
15 or assets to enable them to purchase or rent decent, safe, and
16 sanitary dwelling. These corporations, limited liability
17 companies, or other business entities are authorized and
18 empowered to join partnerships, joint ventures, or limited
19 liability companies or to otherwise engage with business
20 entities in the development, acquisition, leasing,
21 construction, rehabilitation, management, or operation of such
22 projects. The creation of such corporations, limited liability
23 companies, or other business entities by housing authorities
24 for the purposes set forth in this chapter together with all
25 proceedings, acts, and things theretofore undertaken,
26 performed, or done are hereby validated, ratified, confirmed,
27 approved, and declared legal in all respects.

28 (9) Notwithstanding the provisions for per diem and
29 travel expenses of public officers, employees, and authorized
30 persons set forth in s. 112.061, the governing board of an
31 authority may approve and implement policies for per diem,

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1 travel, and other expenses of its officials, officers, board
2 members, employees, and authorized persons in a manner
3 consistent with federal guidelines.

4 Section 17. Section 421.09, Florida Statutes, is
5 amended to read:

6 421.09 Operation not for profit.--It is the policy of
7 this state that each housing authority shall manage and
8 operate its housing projects in an efficient manner so as to
9 enable it to fix the rentals for dwelling accommodations at
10 the lowest possible rates consistent with its providing
11 decent, safe and sanitary dwelling accommodations, and that no
12 housing authority shall construct or operate any such project
13 for profit, or as a source of revenue to the city. To this end
14 an authority shall fix the rentals for dwellings in its
15 project at no higher rate than it shall find to be necessary
16 in order to produce revenues which, together with all other
17 available moneys, revenue, income and receipts of the
18 authority from whatever sources derived, will be sufficient:

19 (1) To pay, as the same shall become due, the
20 principal and interest on the debentures of the authority;

21 (2) To meet the cost of, and to provide for,
22 maintaining and operating the projects, including the cost of
23 any insurance, and the administrative expenses of the
24 authority; and

25 (3) To create, during not less than the 6 years
26 immediately succeeding its issuance of any debentures, a
27 reserve sufficient to meet the largest principal and interest
28 payments which will be due on such debentures in any one year
29 thereafter, and to maintain such reserve.

30
31 This section shall in no way prohibit or restrict the

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1 activities or operations of the business entities created
2 pursuant to s. 421.08(8).

3 Section 18. Section 421.23, Florida Statutes, is
4 amended to read:

5 421.23 Liabilities of authority.--In no event shall
6 the liabilities, whether ex contractu or ex delicto, of an
7 authority arising from the operation of its housing projects,
8 be payable from any funds other than the rents, fees, or
9 revenues of such projects and any grants or subsidies paid to
10 such authority by the Federal Government, unless such other
11 funds are lawfully pledged by the authority's governing board.

12 Section 19. Section 421.54, Florida Statutes, is
13 repealed.

14
15

16 ===== T I T L E A M E N D M E N T =====

17 And the title is amended as follows:

18 On page 1, line 29, after the semicolon,

19

20 insert:

21 providing a popular name; creating s. 193.017,
22 F.S.; providing for a low-income housing tax
23 credit for certain property used for affordable
24 housing; providing criteria, restrictions, and
25 limitations; amending s. 253.034, F.S.;
26 including affordable housing under provisions
27 governing permissible uses of certain surplus
28 state-owned lands; amending s. 420.0003, F.S.;
29 providing additional criteria for the
30 affordable housing delivery system under the
31 state housing strategy; amending s. 420.507,

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1 F.S.; revising powers of the Florida Housing
2 Finance Corporation to provide additional
3 criteria and requirements for certain housing
4 projects; providing additional powers to
5 promote single family homeownership and
6 establish requirements for reporting certain
7 information relating to programs of the
8 corporation; amending s. 420.508, F.S.;
9 providing the corporation with special powers
10 to provide for master lease agreements for
11 farmworker housing developments for certain
12 purposes; amending s. 420.5087, F.S.;
13 increasing a cap for loans per housing
14 community for the elderly; revising a criterion
15 for state apartment incentive loans; amending
16 s. 420.511, F.S.; providing additional
17 requirements for an annual report by the
18 corporation; amending s. 420.9072, F.S.;
19 providing additional legislative intent
20 relating to local government affordable housing
21 advisory committees; amending s. 420.9076,
22 F.S.; providing for a minimum number of
23 affordable housing advisory committee members;
24 providing a criterion for additional members;
25 requiring counties and municipalities
26 participating in the State Housing Initiative
27 Partnership Program to maintain an operational
28 advisory committee; providing additional
29 recommendation requirements for such advisory
30 committees; providing additional duties of the
31 advisory committees; amending s. 421.02, F.S.;

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1 revising a legislative declaration relating to
2 blighted areas; amending s. 421.08, F.S.;
3 authorizing certain housing authorities to
4 create business entities for certain purposes;
5 providing requirements and limitations;
6 authorizing such authorities to provide for per
7 diem, travel, and other expenses; amending s.
8 421.09, F.S.; providing construction; amending
9 s. 421.23, F.S.; revising a limitation on
10 financial liabilities of such authorities;
11 repealing s. 421.54, F.S., relating to housing
12 authorities in Orange County and Seminole
13 County;

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