

**PETITION BY  
READER & PARTNERS, LLC,  
TO  
THE TOWN COUNCIL OF THE  
TOWN OF HOWEY-IN-THE-HILLS,  
FLORIDA**

**REQUESTING THE ESTABLISHMENT OF THE  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT**

Reader & Partners, LLC, a Florida limited liability company, (collectively, the "Petitioner") hereby petitions the TOWN COUNCIL OF HOWEY-IN-THE-HILLS, FLORIDA (the "Town"), pursuant to the "Uniform Community Development District Act of 1980," Chapter 190, Florida Statutes, to adopt an ordinance establishing the Lake Hills Community Development District (hereinafter "CDD" or "District") with respect to land described herein. In support thereof, the Petitioner submits:

1. Petitioner. Reader & Partners, LLC has its principal place of business at 5850 T. G. Lee Boulevard, Suite 200, Orlando, FL 32822.

2. Location and Size. The property to be included within the District is located entirely within the incorporated limits of the Town of Howey-in-the-Hills, Florida and is depicted on the general location map attached to and incorporated with this Petition as **Exhibit 1**. The site is generally located north of Highway 48 and west of Highway 19. The proposed District covers approximately 220.21 +/- acres of land. The metes and bounds description of the external boundaries of the District is attached to and incorporated with this Petition as **Exhibit 2**. There is no real property within the proposed external boundaries of the District that is excluded from the District.

3. Landowner Consent. Petitioner has obtained written consent to establish the District from the owners of one hundred percent (100%) of the real property located within the boundaries of the District. The written consent is attached to and incorporated with this Petition as **Exhibit 3**.

4. Name. The name of the proposed District will be Lake Hills Community Development District.

5. Initial Board Members. The names and addresses of those designated to be the five (5) initial members of the Board of Supervisors of the District, all of whom are residents of the State of Florida and citizens of the United States, are as follows:

1. Name: Kimberly Locher  
Address: 5850 T.G. Lee Boulevard, Suite 200  
Orlando, FL 32822  
Relationship to Petitioner: Affiliate of Petitioner

2. Name: Jeffrey Reader  
Address: 5850 T.G. Lee Boulevard, Suite 200  
Orlando, FL 32822  
Relationship to Petitioner: Affiliate of Petitioner
3. Name: Marlene DeMarco  
Address: 5850 T.G. Lee Boulevard, Suite 200  
Orlando, FL 32822  
Relationship to Petitioner: Affiliate of Petitioner
4. Name: Ryan Lefkowitz  
Address: 923 N. Pennsylvania Ave  
Winter Park, FL 32789  
Relationship to Petitioner: Affiliate of Petitioner
5. Name: Jay Diceglie  
Address: 923 N. Pennsylvania Ave  
Winter Park, FL 32789  
Relationship to Petitioner: Affiliate of Petitioner

6. Major Water and Wastewater Facilities. A map of the lands within the proposed District showing the existing major trunk water mains, sewer interceptors and the major outfall canals and drainage basins is attached to and incorporated with this Petition as **Exhibit 4**.

7. District Facilities and Services. The District presently expects to finance, construct, install and maintain improvements of the District's facilities to benefit the lands within the District. Attached to and incorporated with this Petition, **Exhibit 5** describes the type of facilities and the estimated costs. This is a good faith estimate. Actual construction timetables and expenditures may vary, due in part to the effects of future changes in the economic conditions upon costs such as labor, services, materials, interest rates and market conditions.

8. Existing Zoning and Future Land Use. The existing zoning for lands within the proposed District and the proposed future general distribution, location, and extent of the public and private land uses within and surrounding the District, as designated on the current Howey-in-the-Hills Land Use Map are attached hereto and incorporated with this Petition as **Exhibit 6**.

9. Statement of Estimated Regulatory Costs. A Statement of Estimated Regulatory Costs (hereinafter "SERC") prepared in accordance with the requirements of Section 120.541, Florida Statutes, is attached to and incorporated with this Petition as **Exhibit 7**.

10. Authorized Agent. The Petitioner is authorized to do business in Florida. The authorized agent for the Petitioner is Mark A. Watts, Esq., Cobb Cole, whose address is 231 N. Woodland Blvd., DeLand, FL 32720. A signed Authorization of Agent is attached as **Exhibit 8**.

Copies of all correspondence and official notices should be sent to the address in the previous sentence.

11. Powers Requested. The District is seeking and hereby requests the right to exercise all powers provided for in Section 190.011, Florida Statutes, including the power of eminent domain as outlined in Section 190.011 (11), Florida Statutes, and all special powers outlined in Section 190.012, Florida Statutes. The full text of the powers requested herein is set forth in **Addendum No. 1** attached hereto.

12. Justification Statement. The property within the District is amenable to operating as an independent special district for the following reasons:

a. All statements contained in this Petition are true and correct.

b. The District and all land uses and services planned therein are not inconsistent with applicable elements or portions of the effective Howey-in-the-Hills Comprehensive Land use Plan, as amended, or any applicable elements of the state comprehensive plan.

c. The area of land within the proposed District is part of a unified plan of development approved by the Town of Howey-in-the-Hills, Florida. The land to be included in the District is of sufficient size and is sufficiently compact and contiguous to be developed as one functional and interrelated development.

d. The proposed District will be the best alternative available for delivering community development services to the area to be served because (i) the District provides a mechanism for delivering those services and facilities in a manner that does not financially impact persons residing outside the District and (ii) the District provides a responsible perpetual entity capable of making reasonable provisions for the operation and maintenance of the District services and facilities in the future.

e. The District's community development services and facilities will be compatible with the capacity and use of existing local and regional community development services and facilities, as is evidenced by the Howey-in-the-Hills Comprehensive Plan, will allow for a more efficient use of resources, and will provide a perpetual entity capable of making provisions for the operation and maintenance of the District services and facilities.

f. For the foregoing reasons, the area to be served by the proposed District is amenable to separate special district government.

WHEREFORE, Petitioner respectfully requests the Town Council of the Town of Howey-in-the-Hills to:

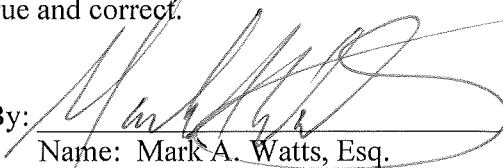
1. Direct that a local public hearing be held as required by Section 190.005(2)(b), Florida Statutes; to consider the establishment of the Lake Hills Community Development District; and

2. Grant the Petition for Establishment and adopt an Ordinance pursuant to Chapter 190, Florida Statutes; establishing the Lake Hills Community Development District; and

3. Consent to the District's exercise of its statutory powers requested herein, as those powers are set forth in Chapter 190, Florida Statutes.

RESPECTFULLY SUBMITTED, this 16th day of November, 2023.

I, Mark A. Watts, Esq. of Cobb Cole, hereby certify, under oath, that I am duly authorized to file this Petition on behalf of the Petitioner. I, Mark A. Watts, Esq. further certify, under oath, that all information contained within this Petition is true and correct.

By:   
Name: Mark A. Watts, Esq.  
Title: Agent

## **PETITION LIST OF EXHIBITS**

### **Exhibit "1"**

General Location of District

### **Exhibit "2"**

Metes and Bounds Legal Description

### **Exhibit "3"**

Written Consent of 100% of District Landowners  
To Establish of District

### **Exhibit "4"**

Existing Water Main, Sewer Interceptors and Outfalls

### **Exhibit "5"**

Proposed Timetables for Construction of District Services  
and Estimated Cost of Constructing the Proposed Services

### **Exhibit "6"**

Zoning and Future Land Use Map

### **Exhibit "7"**

Statement of Estimated Regulatory Costs

### **Exhibit "8"**

Authorization of Agent

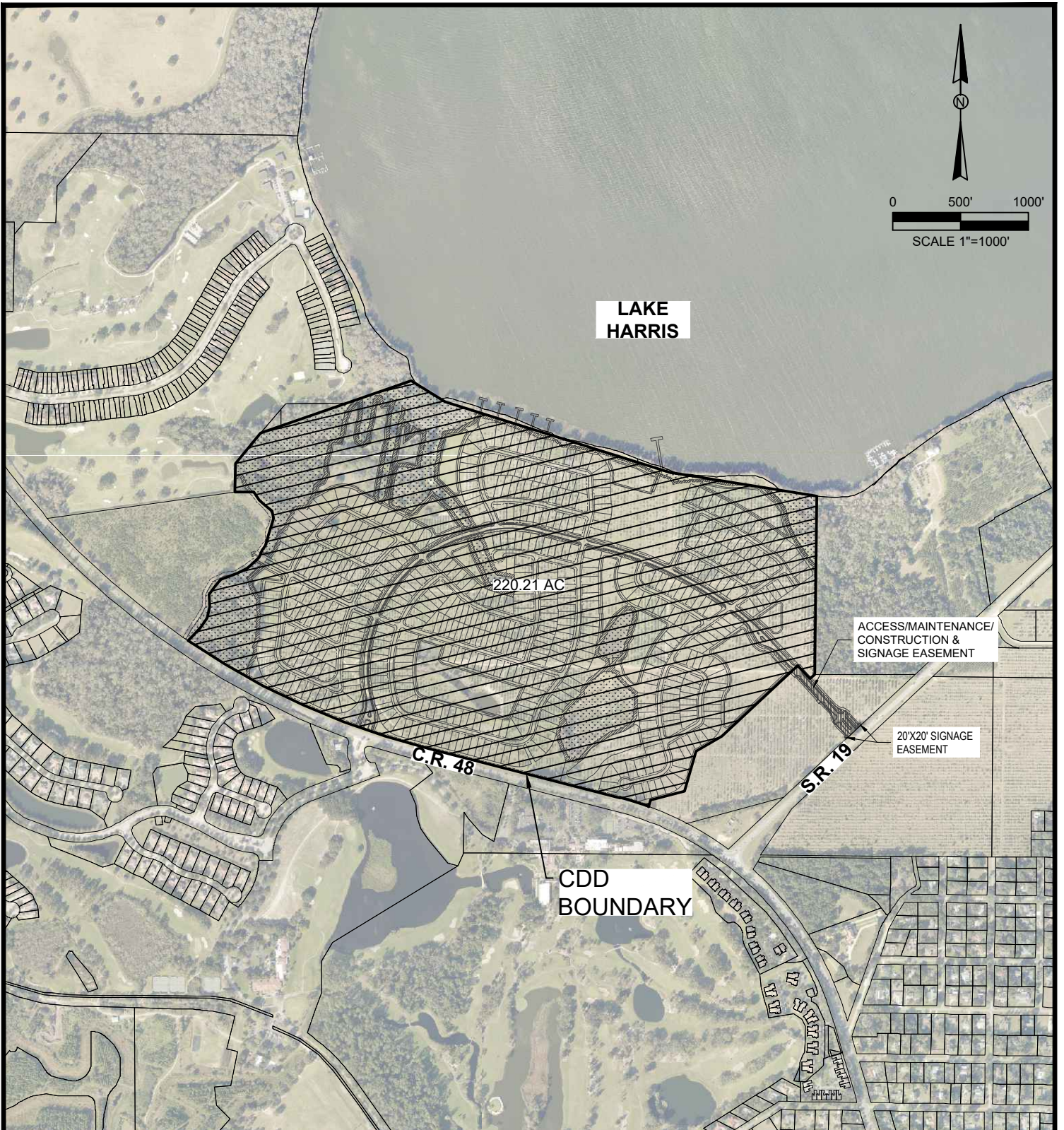
### **Attachment No. 1**

Florida Statutes Section 190.011 and 190.012(1)

**EXHIBIT 1**

**GENERAL LOCATION OF THE PROPOSED  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT**





**MADDEN**  
 MOORHEAD & STOKES, LLC  
**CIVIL ENGINEERS**

431 E. HORATIO AVE, SUITE 260 MAITLAND, FL 32751 (407) 629-8330  
 CERTIFICATE OF AUTHORIZATION NO. CA-0007723

JOB NUMBER:	23019
SEC: 23 TWP: 20S RNG: 25E	
DRAWN BY:	JFV
APPROVED BY:	DS
DATE:	11/16/23
SCALE:	1" = 1000'

LAKE HILLS CDD	
GENERAL LOCATION OF DISTRICT	EXHIBIT 1

**EXHIBIT 2**

**METES AND BOUNDS LEGAL DESCRIPTION OF THE  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT**



**LESS AND EXCEPT COMMERCIAL 2**

A PORTION OF GOVERNMENT LOT 9 LYING WESTERLY OF HIGHWAY 19, ALL LYING IN SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: AS A POINT OF REFERENCE COMMENCE AT SOUTHWEST CORNER OF THE SOUTHWEST ¼ OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA AND PROCEED N 00°53'14" E, ALONG THE WEST BOUNDARY OF THE SOUTHWEST 1/4 OF SAID SECTION 23, A DISTANCE OF 1171.08 FEET TO A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF COUNTY ROAD 48 SAID POINT LYING ON A CURVE CONCAVE NORTHEASTERLY HAVING A RADIUS OF 5679.58 FEET AND A CHORD BEARING AND DISTANCE OF S 69°35'43" E, A DISTANCE OF 1186.12 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE LEFT AND SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 1188.29 FEET; THENCE S 75°35'20" E, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 1460.31 FEET TO A POINT OF CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY HAVING A RADIUS OF 2341.83 FEET AND A CHORD BEARING AND DISTANCE OF S 68°56'00" E, A DISTANCE OF 521.94 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE RIGHT AND ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 523.03 FEET TO A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF STATE ROAD 19; THENCE N 75°06'54" E, ALONG SAID NORTHERLY RIGHT OF WAY LINE, A DISTANCE OF 742.75 FEET TO A POINT ON THE WESTERLY RIGHT OF WAY LINE OF STATE ROAD 19; THENCE N 46°59'01" E, ALONG SAID WESTERLY RIGHT OF WAY LINE, A DISTANCE OF 1328.28 TO THE POINT OF BEGINNING; THENCE LEAVING SAID WESTERLY RIGHT OF WAY LINE, N 89°48'40" W, A DISTANCE OF 738.20; THENCE S 46°59'01" W, A DISTANCE OF 50.00 FEET; THENCE S 43°00'59" E, A DISTANCE OF 269.48 FEET TO A POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY HAVING A RADIUS OF 100.00 FEET AND A CHORD BEARING AND DISTANCE OF S 58°09'10" E, A DISTANCE OF 52.22 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE LEFT, A DISTANCE OF 52.84 FEET TO A POINT OF REVERSE CURVATURE OF A CURVE CONCAVE SOUTHWESTERLY HAVING A RADIUS OF 120.00 FEET AND A CHORD BEARING AND DISTANCE OF S 58°09'10" E, A DISTANCE OF 62.67 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE RIGHT, A DISTANCE OF 63.40 FEET; THENCE S 43°00'59" E, A DISTANCE OF 125.00 FEET TO A POINT ON THE AFOREMENTIONED WESTERLY RIGHT OF WAY OF STATE ROAD 19; THENCE N 46°59'01" E, ALONG SAID RIGHT OF WAY LINE, A DISTANCE OF 558.08 FEET TO THE POINT OF BEGINNING.

SAID PARCEL CONTAINING 155,772 SQUARE FEET OR 3.58 ACRES MORE OR LESS.

**LESS AND EXCEPT ACCESS EASEMENT**

COMMENCE AT THE NORTHEAST CORNER OF THE SOUTHEAST 1/4 SECTION 23-20-25; THENCE SOUTH 00°28'42" WEST ALONG THE EAST LINE OF THE SOUTHEAST 1/4 OF SECTION 25, A DISTANCE OF 765.11 FEET TO THE NORTHERLY RIGHT OF WAY OF STATE ROAD 19; THENCE SOUTH 46°59'01" WEST ALONG THE NORTHERLY RIGHT OF WAY, A DISTANCE OF 1,350.12 FEET TO THE POINT OF BEGINNING; THENCE CONTINUE SOUTH 46°59'01" WEST, A DISTANCE OF 120.00 FEET; THENCE NORTH 43°00'59" WEST, A DISTANCE OF 125.00 FEET; TO A POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY, HAVING A RADIUS OF 120.00 FEET AND A CHORD WHICH BEARS NORTH 27°52'48" WEST, A DISTANCE 62.67 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE RIGHT, A DISTANCE OF 63.40 FEET; TO A POINT OF REVERSE CURVATURE OF A CURVE HAVING A RADIUS OF 100.00 FEET AND A CHORD WHICH BEARS NORTH 27°52'48" WEST, AND A DISTANCE OF 52.22 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE LEFT, A DISTANCE OF 52.84 FEET; THENCE NORTH 43°00'59" WEST, A DISTANCE OF 404.25 FEET; THENCE NORTH 46°59'01" EAST, A DISTANCE OF 60.00 FEET; THENCE SOUTH 43°00'59" EAST, A DISTANCE OF 404.25 FEET; TO A POINT OF CURVATURE OF A CURVE CONCAVE NORTHEASTERLY, HAVING A RADIUS OF 100.00 FEET AND A CHORD WHICH BEARS SOUTH 58°09'10" EAST, A DISTANCE 52.22 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE LEFT, A DISTANCE OF 52.84 FEET; TO A POINT OF REVERSE CURVATURE OF A CURVE HAVING A RADIUS OF 120.00 FEET AND A CHORD WHICH BEARS SOUTH 58°09'10" EAST, AND A DISTANCE OF 62.67 FEET; THENCE ALONG THE ARC OF SAID CURVE TO THE RIGHT, A DISTANCE OF 63.40 FEET; THENCE SOUTH 43°00'59" EAST, A DISTANCE OF 125.00 FEE; TO THE POINT OF BEGINNING.

CONTAINING 49,343.34 SQUARE FEET OR 1.13 ACRES, MORE OR LESS.


**PARCEL 2:**

BEGIN AT THE NORTHEAST CORNER OF THE SOUTHEAST ¼ OF SECTION 22, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA, RUN SOUTH 89°09'42" WEST ALONG THE NORTH LINE OF THE SOUTHEAST ¼ A DISTANCE OF 330 FEET; THENCE SOUTH 81°15'42" WEST TO THE EAST LINE OF TRACT "I", OF DRAKE POINT PARK REPLAT, ACCORDING TO THE PLAT THEREOF RECORDED IN PLAT BOOK 10, PAGE 63, OF THE PUBLIC RECORDS OF LAKE COUNTY, FLORIDA; THENCE CONTINUE SOUTH 81°15'42" WEST TO THE NORTHEASTERLY RIGHT-OF-WAY LINE OF STATE ROAD 48; THENCE SOUTHEASTERLY ALONG SAID NORTHEASTERLY RIGHT-OF-WAY LINE OF STATE ROAD 48 TO THE EAST LINE OF THE SOUTHEAST ¼ OF SECTION 22; THENCE NORTH ALONG THE EAST LINE OF THE SOUTHEAST ¼ TO THE POINT OF BEGINNING.

**PARCEL 3:**

FROM THE SOUTHEAST CORNER OF THE NORTHEAST ¼ OF SECTION 22, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA, RUN SOUTH 89°09'42" WEST ALONG THE SOUTH LINE OF THE NORTHEAST ¼ A DISTANCE OF 330 FEET; THENCE NORTH 00°15'45" WEST 210 FEET; THENCE NORTH 38°44'24" EAST 583.17 FEET FOR THE POINT OF BEGINNING; THENCE NORTH 89°10'02" EAST 1177 FEET TO THE WATERS OF LAKE HARRIS; THENCE SOUTHEASTERLY ALONG SAID WATERS OF LAKE HARRIS TO A POINT ON THE EAST LINE OF THE NORTHWEST ¼ OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA; THENCE SOUTH ALONG THE EAST LINE OF THE NORTHWEST ¼ TO THE SOUTHEAST CORNER OF THE NORTHWEST ¼ OF SECTION 23; THENCE WEST ALONG THE SOUTH LINE OF THE NORTHWEST ¼ TO THE SOUTHWEST CORNER OF THE NORTHWEST ¼ OF SECTION 23, SAID POINT HEREBY DESIGNATED AS POINT "A", RETURN TO THE POINT OF BEGINNING AND RUN SOUTH 38°44'24" WEST TO A POINT ON THE WEST LINE OF THE NORTHWEST ¼ OF SAID SECTION 23; THENCE SOUTH ALONG THE WEST LINE OF THE NORTHWEST ¼ TO POINT "A". LESS AND EXCEPT THAT PORTION DESCRIBED IN THAT CERTAIN CORRECTIVE WARRANTY DEED RECORDED IN BOOK 4103, PAGE 313, PUBLIC RECORDS OF LAKE COUNTY, FLORIDA.

LEGAL DESCRIPTION CONTINUES ON EXHIBIT 2C.

 <p><b>MADDEN</b> MOORHEAD &amp; STOKES, LLC <b>CIVIL ENGINEERS</b></p> <p>431 E. HORATIO AVE, SUITE 260 MAITLAND, FL 32751 (407) 629-8330 CERTIFICATE OF AUTHORIZATION NO. CA-0007723</p>	JOB NUMBER:	23019	<b>LAKE HILLS CDD</b>	
	SEC: 23 TWP: 20S RNG: 25E			
	DRAWN BY:	JFV		
	APPROVED BY:	DS	<b>METES AND BOUNDS LEGAL DESCRIPTION</b>	<b>EXHIBIT 2A</b>
	DATE:	11/16/23		
SCALE:	NONE			

**PARCEL 4:**

THAT PART OF THE N.W. 1/4 OF THE S.E. 1/4 OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA, BOUNDED AND DESCRIBED AS FOLLOWS: BEGIN AT A CONCRETE MONUMENT (NO NUMBER) AT THE SOUTHEAST CORNER OF THE N.W. 1/4 OF THE S.E. 1/4 OF SAID SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, AND RUN N.00°04'21"E ALONG THE EAST LINE OF THE N.W. 1/4 OF THE S.E. 1/4 A DISTANCE OF 1202.20 FEET TO AN IRON PIN LABELED L.B. 707; THENCE CONTINUE N.00°04'21"E ALONG THE EAST LINE OF THE N.W. 1/4 OF THE S.E. 1/4 A DISTANCE OF 112 FEET, MORE OR LESS, TO A POINT ON THE SOUTHERLY WATERS EDGE OF LAKE HARRIS AND A POINT HEREBY DESIGNATED AS POINT "A", RETURN TO THE POINT OF BEGINNING AND RUN S.89°35'28"W. ALONG THE SOUTH LINE OF THE N.W. 1/4 OF THE S.E. 1/4 OF SAID SECTION 23 A DISTANCE OF 1100.00 FEET TO AN IRON PIN LABELED L.B. 707; THENCE N.00°27'54"E. 1451.76 FEET TO AN IRON ROD PIN LABELED L.B. 707; THENCE CONTINUE N00°27'54"E, 33 FEET, MORE OR LESS, TO A POINT ON THE SOUTHERLY WATERS EDGE OF LAKE HARRIS; THENCE EASTERLY ALONG AND WITH SAID SOUTHERLY WATERS EDGE OF LAKE HARRIS TO INTERSECT THE AFOREMENTIONED POINT "A".

SUBJECT TO AND TOGETHER WITH AN EASEMENT FOR INGRESS AND EGRESS LYING OVER, UPON AND THROUGH THE FOLLOWING DESCRIBED PARCEL OF LAND;

THE NORTH 50 FEET OF THE S.E. 1/4 OF THE S.E. 1/4 OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA LYING WEST OF THE NORTHWESTERLY RIGHT-OF-WAY LINE OF STATE HIGHWAY NO. 19, AND AN EASEMENT FOR INGRESS AND EGRESS LYING OVER, UPON AND THROUGH THE FOLLOWING DESCRIBED PARCEL OF LAND: BEGIN AT THE SOUTHEAST CORNER OF THE N.W. 1/4 OF THE S.E. 1/4 OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA AND RUN S.00°04'21"W, ALONG THE EAST LINE OF THE N.W. 1/4 OF THE S.E. 1/4 OF SAID SECTION 23 A DISTANCE OF 50.00 FEET TO A POINT AT THE BEGINNING OF A CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 100.00 FEET AND A RADIAL BEARING OF S.00°02'52"W.; THENCE WESTERLY AND NORTHWESTERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 28°35'47" AN ARC LENGTH OF 49.91 FEET TO THE END OF SAID CURVE AND THE BEGINNING OF A CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 100.00 FEET; THENCE NORTHWESTERLY AND WESTERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 28°35'47" AN ARC LENGTH OF 49.91 FEET TO THE END OF SAID CURVE; THENCE S.89°35'28" W., PARALLEL WITH THE SOUTH LINE OF THE N.W. 1/4 OF THE S.E. 1/4 OF THE AFOREMENTIONED SECTION 23 A DISTANCE OF 1029.81 FEET; THENCE N.00°27'54"E., 1510 FEET, MORE OR LESS TO A POINT ON THE SOUTHERLY WATERS EDGE OF LAKE HARRIS AND A POINT HEREBY DESIGNATED AS POINT "A"; RETURN TO THE POINT OF BEGINNING AND RUN N.00°04'21"E LONG THE EAST LINE OF THE N.W. 1/4 OF THE S.E. 1/4 OF THE AFOREMENTIONED SECTION 23 A DISTANCE OF 25.00 FEET; THENCE S.89°35'28"W., PARALLEL WITH THE SOUTH LINE OF THE N.W. 1/4 OF THE S.E. 1/4 A DISTANCE OF 1074.82 FEET; THENCE N.00°27'54"E., 1459 FEET, MORE OR LESS, TO A POINT ON THE SOUTHERLY WATERS EDGE OF LAKE HARRIS; THENCE WESTERLY ALONG AND WITH SAID SOUTHERLY WATERS EDGE OF LAKE HARRIS TO INTERSECT THE AFOREMENTIONED POINT "A".

**PARCEL 5:**

BEGIN AT THE SOUTHEAST CORNER OF THE NORTHEAST 1/4 OF SECTION 22, TOWNSHIP 20 SOUTH, RANGE 25 EAST, LAKE COUNTY, FLORIDA, RUN SOUTH 89°09'42" WEST ALONG THE SOUTH LINE OF THE NORTHEAST 1/4 A DISTANCE OF 330 FEET; THENCE NORTH 00°15'45" WEST, 210 FEET; THENCE NORTH 38°44'24" EAST TO A POINT ON THE EAST LINE OF THE NORTHEAST 1/4 OF SECTION 22; THENCE SOUTH ALONG THE EAST LINE OF THE NORTHEAST 1/4 TO THE POINT OF BEGINNING.

LESS AND EXCEPT THAT PORTION DESCRIBED IN THAT CERTAIN CORRECTIVE WARRANTY DEED RECORDED IN BOOK 4103, PAGE 313, PUBLIC RECORDS OF LAKE COUNTY, FLORIDA.

**PARCEL 6:**

THAT PART OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA, BOUNDED AND DESCRIBED AS FOLLOWS: COMMENCE AT A CONCRETE MONUMENT (NO NUMBER) AT THE SOUTHEAST CORNER OF THE NORTHEAST 1/4 OF SECTION 22, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA, SAID POINT ALSO BEING THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF SECTION 23, TOWNSHIP 20 SOUTH, RANGE 25 EAST, IN LAKE COUNTY, FLORIDA, RUN S.89°52'11" W. ALONG THE SOUTH LINE OF THE NORTHEAST 1/4 OF SECTION 22, A DISTANCE OF 330.00 FEET TO AN IRON PIPE LABELED LB707; THENCE N.00°09'33"E., 210.05 FEET TO A CONCRETE MONUMENT LABELED LS1916; THENCE N.39°31'51" E., 583.79 FEET TO AN IRON PIN LABELED LB7514; THENCE N.89°52'31"E., 468.45 FEET TO THE POINT OF BEGINNING OF THIS DESCRIPTION, FROM SAID POINT OF BEGINNING RUN N.70°57'18"E., 519 FEET MORE OR LESS TO A POINT ON THE SOUTHWESTERLY WATERS EDGE OF LAKE HARRIS AND A POINT HEREBY DESIGNATED AS POINT "A", RETURN TO THE POINT OF BEGINNING AND RUN N.89°52'31"E., 708.81 FEET TO AN IRON PIN LABELED LB7514; THENCE CONTINUE N.89°52'31"E., 30 FEET MORE OR LESS TO A POINT ON THE SOUTHWESTERLY WATERS EDGE OF LAKE HARRIS; THENCE NORTHWESTERLY ALONG AND WITH SAID SOUTHWESTERLY WATERS EDGE OF LAKE HARRIS TO INTERSECT THE AFOREMENTIONED POINT "A".

OVERALL PARCEL TO THE BOUNDARY CLOSURE LINE CONTAINS 9,592,251.16 SQUARE FEET OR 220.21 ACRES MORE OR LESS.



**MADDEN**  
MOORHEAD & STOKES, LLC  
**CIVIL ENGINEERS**

431 E. HORATIO AVE, SUITE 260 MAITLAND, FL 32751 (407) 629-8330  
CERTIFICATE OF AUTHORIZATION NO. CA-0007723

JOB NUMBER:	23019
SEC: 23 TWP: 20S RNG: 25E	
DRAWN BY:	JFV
APPROVED BY:	DS
DATE:	11/16/23
SCALE:	NONE

<b>LAKE HILLS CDD</b>	
<b>METES AND BOUNDS LEGAL DESCRIPTION</b>	<b>EXHIBIT 2A</b>

**EXHIBIT 3**

**WRITTEN CONSENT OF 100% OF THE REAL PROPERTY OWNERS WITHIN THE  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT**

**CONSENT AND JOINDER**  
**TO PETITION TO ESTABLISH THE**  
**LAKE HILLS**  
**COMMUNITY DEVELOPMENT DISTRICT**

**THE UNDERSIGNED**, LAKE HARRIS (ORLANDO) ASLI VII Owner #1, LLC, LAKE HARRIS (ORLANDO) ASLI VII Owner #2, LLC, and LAKE HARRIS (ORLANDO) ASLI VII Owner #3, LLC, collectively, is the owner of certain lands located in Howey-in-the-Hills, Florida, and more fully described as follows:

SEE EXHIBIT “A” ATTACHED HERETO AND INCORPORATED HEREIN

The above-described land is hereinafter referred to as the “Property”.

The undersigned understands and acknowledges that Reader & Partners, LLC (“Petitioner”), intends to submit an application to Howey-In-The-Hills, Florida to establish the LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT (the “District”) in accordance with the provisions of Chapter 190 of the Florida Statutes.

The undersigned is the owner of a portion of the lands located within the proposed District and described in Exhibit “A” attached hereto, and the undersigned understands and acknowledges that, pursuant to the provisions of Section 190.005(2)(a), *Florida Statutes*, the Petitioner is required to include the written consent to the establishment of the District of one-hundred percent (100%) of the owners of the lands to be included within the District.

The undersigned hereby consents to the inclusion of its Property into the Lake Hills Community Development District, which will include the Property within the lands to be a part of the District, and agrees to further execute any other documentation necessary or convenient to evidence this consent and joinder.

The undersigned hereby acknowledges and agrees that the foregoing consent and obligation to execute additional documentation is and shall be a covenant running with the land which shall bind the undersigned’s heirs, personal representatives, administrators, successors-in-title and assigns and shall remain in full force and effect three (3) years from the date hereof.

**SIGNATURE PAGE FOR CONSENT AND JOINDER  
TO PETITION TO ESTABLISH THE LAKE HILLS  
COMMUNITY DEVELOPMENT DISTRICT**

Executed this \_\_\_\_ day of \_\_\_\_\_, 2023


By: LAKE HARRIS (ORLANDO) ASLI VII  
Owner #1, LLC,  
a Delaware Limited Liability Company

By: LAKE HARRIS (ORLANDO) ASLI VII  
HOLDINGS, LLC, a Delaware limited liability  
company, its sole member

By: Avanti Strategic Land Investors, VII,  
L.L.L.P., a Delaware limited liability partnership, its  
Sole Member

By: Avanti Properties Group II, L.L.L.P., a  
Delaware limited liability limited partnership, its  
Managing General Partner

By: Avanti Management Corporation, Its Manager,  
its sole General Partner

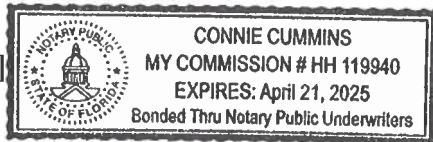
By:   
Print Name: RYAN KOZLOWSKI  
Title: Vice President

Date: 11/15/2023

STATE OF Florida  
COUNTY OF Orange

The foregoing instrument was acknowledged before me by (X) means of physical presence or ( ) online notarization on November 13, 2023, by Ryan J. Lefkowitz, the Vice President of Avanti Management Corporation, a Florida corporation, the sole General Partner of Avanti Properties Group II, L.L.L.P., a Delaware limited liability limited partnership, the Managing General Partner of Avanti Strategic Land Investors, VII, L.L.L.P., a Delaware limited liability partnership, the Sole Member of Lake Harris (Orlando) ASLI VI Holdings, LLC, the Sole Member of LAKE HARRIS (ORLANDO) ASLI VII OWNER #1, LLC, a Delaware limited liability company, on behalf said corporation, limited liability limited partnership, and limited liability companies. He is personally known to me or has produced \_\_\_\_\_ as identification.

[SEAL]



Connie Cummins

Signature of Notary Public

Print Name: Connie Cummins

Commission No.: HH119940

Commission Expires: 4/21/25


By: LAKE HARRIS (ORLANDO) ASLI VII  
Owner #2, LLC  
a Delaware Limited Liability Company

By: LAKE HARRIS (ORLANDO) ASLI VII  
HOLDINGS, LLC, a Delaware limited liability  
company, its sole member

By: Avanti Strategic Land Investors, VII,  
L.L.L.P., a Delaware limited liability partnership, its  
Sole Member

By: Avanti Properties Group II, L.L.L.P., a  
Delaware limited liability limited partnership, its  
Managing General Partner

By: Avanti Management Corporation, Its Manager,  
its sole General Partner

By:   
Print Name: F. L. KOWITZ  
Title: VIC PRESIDENT

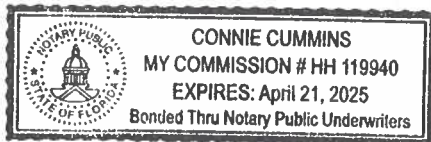
Date: 11/13/2023



STATE OF Florida  
COUNTY OF Orange

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[SEAL]



Connie Cummins  
Signature of Notary Public  
Print Name: Connie Cummins  
Commission No.: HH119940

Commission Expires: 4/21/25

By: LAKE HARRIS (ORLANDO) ASLI VII  
Owner #3, LLC  
a Delaware Limited Liability Company

By: LAKE HARRIS (ORLANDO) ASLI VII  
HOLDINGS, LLC, a Delaware limited liability  
company, its sole member

By: Avanti Strategic Land Investors, VII,  
L.L.L.P., a Delaware limited liability partnership, its  
Sole Member

By: Avanti Properties Group II, L.L.L.P., a  
Delaware limited liability limited partnership, its  
Managing General Partner

By: Avanti Management Corporation, Its Manager,  
its sole General Partner

By:

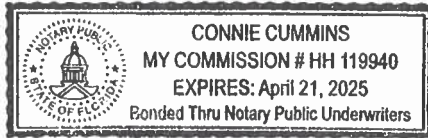
  
Print Name: BRYAN LABADIE  
Title: VICE PRESIDENT

Date: 11/13/2023

STATE OF Florida  
COUNTY OF Orange

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[SEAL]



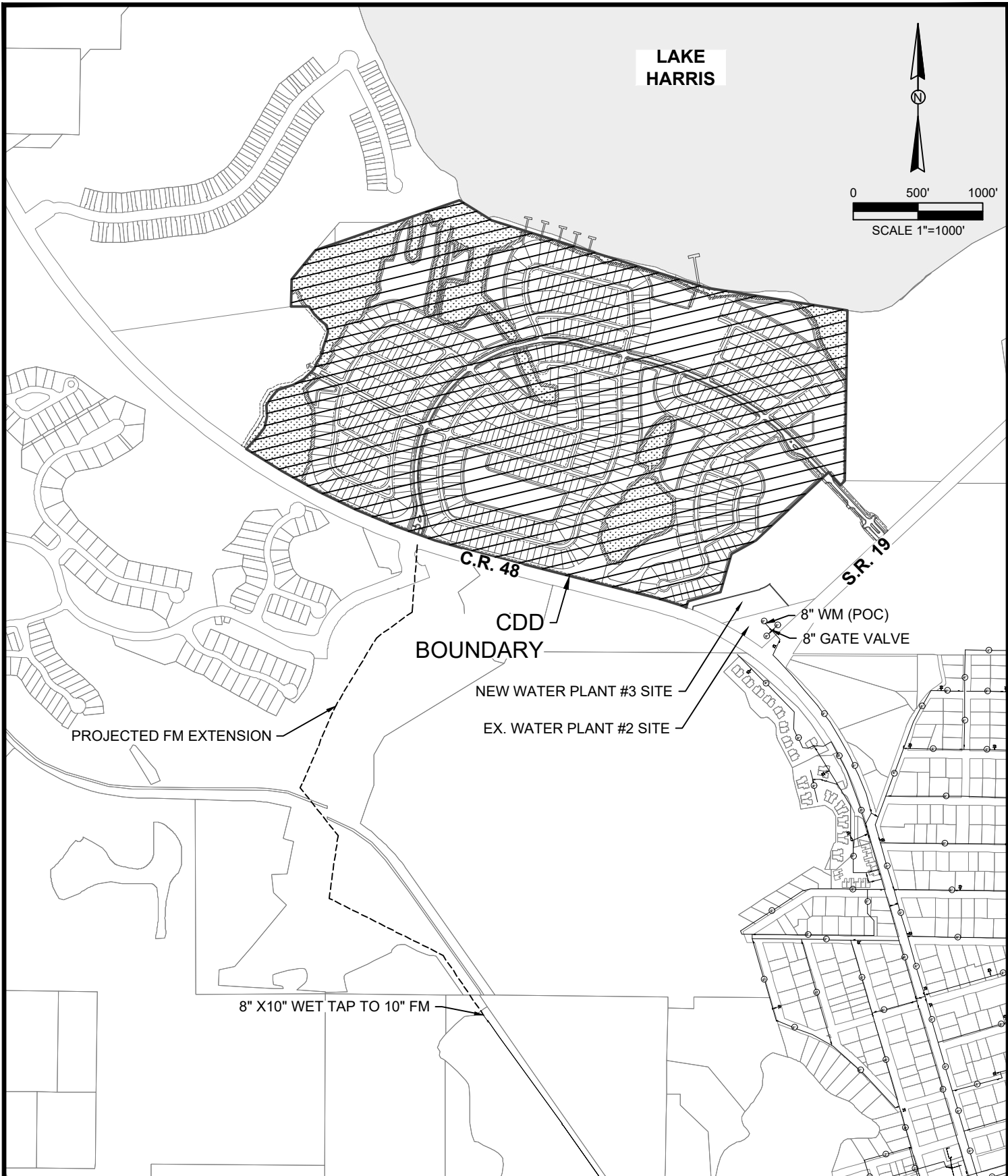
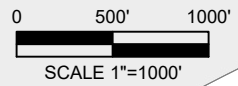
Connie Cummins  
Signature of Notary Public  
Print Name: Connie Cummins  
Commission No.: \_\_\_\_\_

Commission Expires: 4/21/25

**EXHIBIT 4**

**MAP OF THE LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT  
SHOWING EXISTING MAJOR TRUNK  
WATER MAINS, SEWER INTERCEPTORS AND OUTFALLS**

LAKE HARRIS



**MADDEN**  
MOORHEAD & STOKES, LLC  
**CIVIL ENGINEERS**

431 E. HORATIO AVE, SUITE 260 MAITLAND, FL 32751 (407) 629-8330  
CERTIFICATE OF AUTHORIZATION NO. CA-0007723

JOB NUMBER:	23019
SEC: 23 TWP: 20S RNG: 25E	
DRAWN BY:	JFV
APPROVED BY:	DS
DATE:	11/06/23
SCALE:	1" = 1000'

LAKE HILLS  
CDD

EXISTING WATER MAIN,  
SEWER INTERCEPTORS  
& OUTFALLS

EXHIBIT  
4

**EXHIBIT 5**

**COST ESTIMATES AND TIMETABLE FOR CONSTRUCTION OF  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT  
SERVICES AND FACILITIES**

## CIP COST ESTIMATE

IMPROVEMENT	ESTIMATED COST	FUNDING SOURCE	OPERATION & MAINTENANCE ENTITY
Public Roadways	14,846,000	CDD/Developer	Howey In The Hills
Public Sitework and Storm Drainage	14,275,000	CDD/Developer	CDD
Water, Reclaimed, and Wastewater Systems	28,550,000	CDD/Developer	Howey In The Hills
Hardscaping, Landscaping, Irrigation	4,910,600	CDD/Developer	CDD
Differential Cost of Undergrounding Conduit	3,597,300	CDD/Developer	CDD
On-Site Wetland Mitigation	150,000	CDD/Developer	CDD
Off-Site Improvements - Utilities	1,500,000	CDD/Developer	Howey In The Hills
Off-Site Improvements - Turn Lanes	600,000	CDD/Developer	Lake County/FDOT
Professional Services	1,500,000	CDD/Developer	n/a
Contingency	6,992,890	CDD/Developer	Per Above
<b>Total</b>	<b>76,921,790</b>		

Note: The probable costs estimated herein do not include anticipated carrying costs, interest reserves or other anticipated CDD expenditures that may be incurred.



**MADDEN**  
**MOORHEAD & STOKES, LLC**  
**CIVIL ENGINEERS**

431 E. HORATIO AVE, SUITE 260 MAITLAND, FL 32751 (407) 629-8330  
 CERTIFICATE OF AUTHORIZATION NO. CA-0007723

JOB NUMBER:	23019
SEC: 23 TWP: 20S RNG: 25E	
DRAWN BY:	JFV
APPROVED BY:	DS
DATE:	11/16/23
SCALE:	NONE

**LAKE HILLS  
CDD**

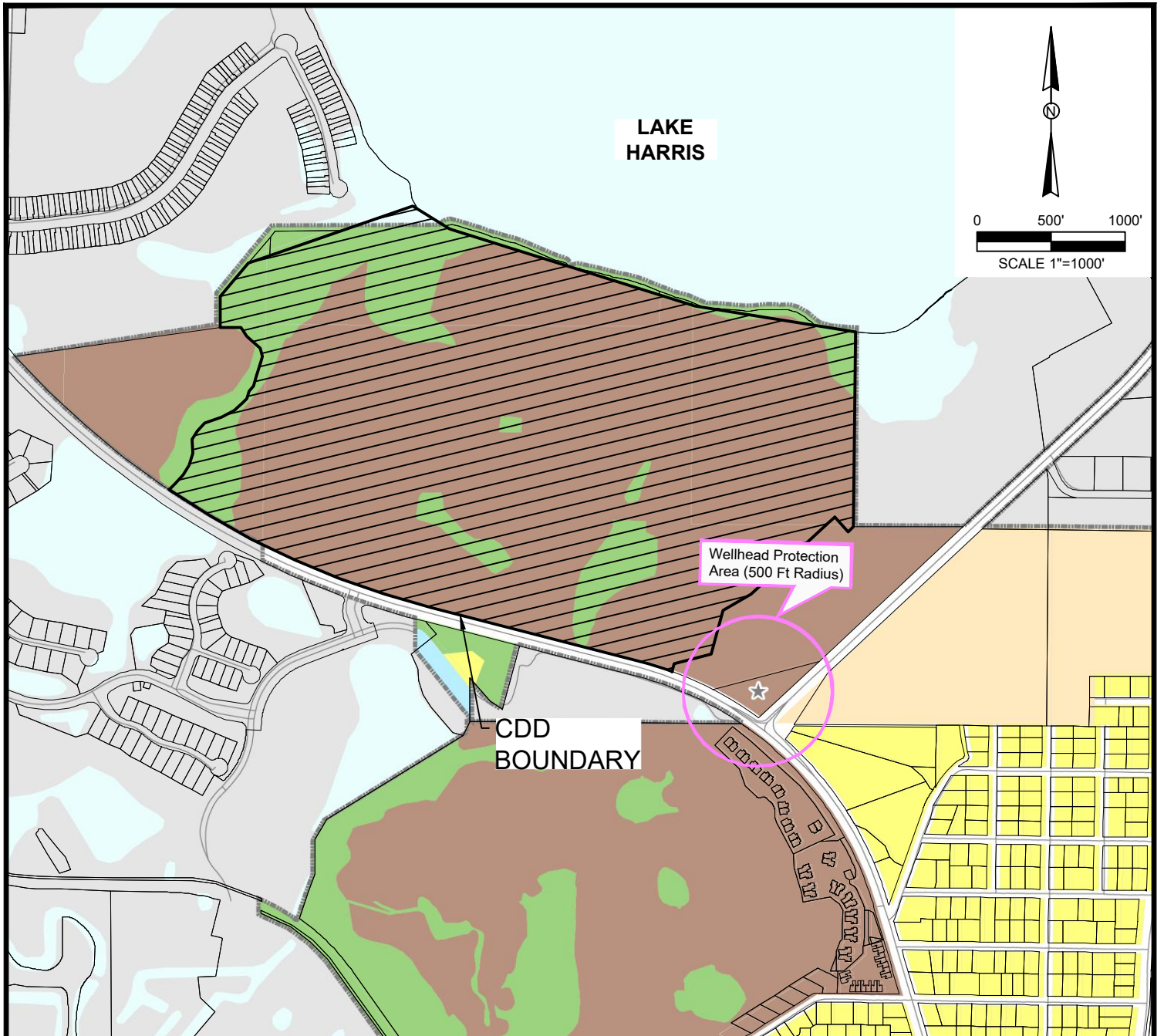
PROPOSED TIMETABLES FOR CONSTRUCTION  
 OF DISTRICT SERVICES & ESTIMATED COST  
 OF CONSTRUCTING THE PROPOSED  
 SERVICES.

**EXHIBIT  
7**



**EXHIBIT 6**

**FUTURE GENERAL DISTRIBUTION, LOCATION AND EXTENT OF  
PUBLIC AND PRIVATE USES WITHIN THE LAKE HILLS  
COMMUNITY DEVELOPMENT DISTRICT IN ACCORDANCE WITH THE  
TOWN OF HOWEY-IN-THE-HILLS ZONING AND FUTURE LAND USE MAPS**



**Legend**

	TCMU - Town Center Mixed Use Overlay	<b>Future Land Use</b>		MDR - Medium Density Residential	
	Town Boundary		CON - Conservation		NC - Neighborhood Commercial
	Potable Water Wellheads		INST - Institutional		PUB - Public/ Utility
	PotableWaterWellheads_Buffer		LDR - Low Density Residential		REC - Recreational
	Parcels		LI - Light Industrial		VMU - Village Mixed Use
	Streets				
	Water Bodies				



**MADDEN**  
**MOORHEAD & STOKES, LLC**  
**CIVIL ENGINEERS**

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**LAKE HILLS  
 CDD**

**ZONING AND FUTURE  
 LAND USE MAP**

**EXHIBIT  
 6**

**EXHIBIT 7**

**STATEMENT OF ESTIMATED REGULATORY COSTS FOR THE  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT**

# LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT

## Statement of Estimated Regulatory Costs

November 7, 2023



Provided by

***Wrathell, Hunt and Associates, LLC***

2300 Glades Road, Suite 410W

Boca Raton, FL 33431

Phone: 561-571-0010

Fax: 561-571-0013

Website: [www.whhassociates.com](http://www.whhassociates.com)

# STATEMENT OF ESTIMATED REGULATORY COSTS

## **1.0 Introduction**

### **1.1 Purpose and Scope**

This Statement of Estimated Regulatory Costs ("SERC") supports the petition to establish the Lake Hills Community Development District ("District") in accordance with the "Uniform Community Development District Act of 1980," Chapter 190, Florida Statutes (the "Act"). The proposed District will comprise approximately 221.34 +/- acres of land located within the Town of Howey-In-the-Hills, Florida (the "Town") and is projected to contain approximately 571 residential dwelling units, which will make up the Lake Hills development. The limitations on the scope of this SERC are explicitly set forth in Section 190.002(2)(d), Florida Statutes ("F.S.") (governing District establishment) as follows:

*"That the process of establishing such a district pursuant to uniform general law be fair and based only on factors material to managing and financing the service delivery function of the district, so that any matter concerning permitting or planning of the development is not material or relevant (emphasis added)."*

### **1.2 Overview of the Lake Hills Community Development District**

The District is designed to provide public infrastructure, services, and facilities along with operation and maintenance of the same to a master planned residential development currently anticipated to contain a total of approximately 571 residential dwelling units, all within the boundaries of the District. Tables 1 and 2 under Section 5.0 detail the anticipated improvements and ownership/maintenance responsibilities the proposed District is anticipated to construct, operate and maintain.

A community development district ("CDD") is an independent unit of special purpose local government authorized by the Act to plan, finance, construct, operate and maintain community-wide infrastructure in planned community developments. CDDs provide a "solution to the state's planning, management and financing needs for delivery of capital infrastructure in order to service projected growth without overburdening other governments and their taxpayers." Section 190.002(1)(a), F.S.

A CDD is not a substitute for the local, general purpose government unit, i.e., the Town or county in which the CDD lies. A CDD does not have the permitting, zoning or policing powers possessed by general purpose governments. A CDD is an alternative means of financing, constructing, operating and maintaining public infrastructure for developments, such as Lake Hills.

### **1.3 Requirements for Statement of Estimated Regulatory Costs**

Section 120.541(2), F.S., defines the elements a statement of estimated regulatory costs must contain:

(a) An economic analysis showing whether the rule directly or indirectly:

1. Is likely to have an adverse impact on economic growth, private sector job creation or employment, or private sector investment in excess of \$1 million in the aggregate within 5 years after the

implementation of the rule;

2. Is likely to have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the rule; or

3. Is likely to increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule.

(b) A good faith estimate of the number of individuals and entities likely to be required to comply with the rule, together with a general description of the types of individuals likely to be affected by the rule.

(c) A good faith estimate of the cost to the agency, and to any other state and local government entities, of implementing and enforcing the proposed rule, and any anticipated effect on state or local revenues.

(d) A good faith estimate of the transactional costs likely to be incurred by individuals and entities, including local government entities, required to comply with the requirements of the rule. As used in this section, "transactional costs" are direct costs that are readily ascertainable based upon standard business practices, and include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

(e) An analysis of the impact on small businesses as defined by s. 288.703, and an analysis of the impact on small counties and small cities as defined in s. 120.52. The impact analysis for small businesses must include the basis for the agency's decision not to implement alternatives that would reduce adverse impacts on small businesses. (Town of Howey-In-the-Hills, according to the Census 2010, has a population of 1,098; therefore, it is defined as a small Town for the purposes of this requirement.)

(f) Any additional information that the agency determines may be useful.

(g) In the statement or revised statement, whichever applies, a description of any regulatory alternatives submitted under paragraph (1)(a) and a statement adopting the alternative or a statement of the reasons for rejecting the alternative in favor of the proposed rule.

Note: the references to "rule" in the statutory requirements for the Statement of Estimated Regulatory Costs also apply to an "ordinance" under section 190.005(2)(a), F.S.

## **2.0 An economic analysis showing whether the ordinance directly or indirectly:**

**1. Is likely to have an adverse impact on economic growth, private sector job creation or employment, or private sector investment in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance;**

**2. Is likely to have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance; or**

**3. Is likely to increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance.**

The ordinance establishing the District is not anticipated to have any direct or indirect adverse impact on economic growth, private sector job creation or employment, private sector investment, business competitiveness, ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation. Any increases in regulatory costs, principally the anticipated increases in transactional costs as a result of imposition of special assessments by the District, will be the direct result of facilities and services provided by the District to the landowners within the District. However, as property ownership in the District is voluntary and additional costs will be disclosed as available to prospective buyers prior to sale, such increases should be considered voluntary, self-imposed and offset by benefits received from the infrastructure and services provided by the District.

**2.1 Impact on economic growth, private sector job creation or employment, or private sector investment in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance.**

The purpose for establishment of the District is to provide public facilities and services to support the development of a new, master planned residential development. The development of the approximately 221.34 +/- acres anticipated to be within the District will promote local economic activity, create local value, lead to local private sector investment and is likely to result in local private sector employment and/or local job creation.

Establishment of the District will allow a systematic method to plan, fund, implement, operate and maintain, for the benefit of the landowners within the District, various public facilities and services. Such facilities and services, as further described in Section 5, will allow for the development of the land within the District. The provision of District's infrastructure and the subsequent development of land will generate private economic activity, economic growth, investment and employment, and job creation. The District intends to use proceeds of indebtedness to fund construction of public infrastructure, which will be constructed by private firms, and once constructed, is likely to use private firms to operate and maintain such infrastructure and provide services to the landowners and residents of the District. The private developer of the land in the District will use its private funds to conduct the private land development and construction of an anticipated approximately 571 residential dwelling units the construction, sale, and continued use/maintenance of which will involve private firms. While similar economic growth, private sector job creation or employment, or private sector investment could be achieved in absence of the District by the private sector alone, the fact that the establishment of the District is initiated by the private developer means that the private developer considers the establishment and continued operation of the District as beneficial to the process of land development and the future economic activity taking place within the District, which in turn will lead directly or indirectly to economic growth, likely private sector job growth and/or support private sector employment, and private sector investments.

**2.2 Impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance.**



When assessing the question of whether the establishment of the District is likely to directly or indirectly have an adverse impact on business competitiveness, including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets, productivity, or innovation, one has to compare these factors in the presence and in the absence of the District in the development. When the question is phrased in this manner, it can be surmised that the establishment of the District is likely to not have a direct or indirect adverse impact on business competitiveness, productivity, or innovation versus that same development without the District. Similar to a purely private solution, District contracts will be bid competitively as to achieve the lowest cost/best value for the particular infrastructure or services desired by the landowners, which will insure that contractors wishing to bid for such contracts will have to demonstrate to the District the most optimal mix of cost, productivity and innovation. Additionally, the establishment of the District for the development is not likely to cause the award of the contracts to favor non-local providers any more than if there was no District. The District, in its purchasing decisions, will not vary from the same principles of cost, productivity and innovation that guide private enterprise.

### **2.3 Likelihood of an increase in regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the ordinance.**

The establishment of the District will not increase any regulatory costs of the State or the Town by virtue that the District will be one of many already existing similar districts within the State and also as described in more detail in Section 4, the proposed District will pay a one-time filing fee to the Town to offset any expenses that the Town may incur in holding a local public hearing on the petition. Similarly, the proposed District will pay annually the required Special District Filing Fee, which fee is meant to offset any State costs related to its oversight of all special districts in the State.

The establishment of the District will, however, directly increase regulatory costs to the landowners within the District. Such increases in regulatory costs, principally the anticipated increases in transactional costs as a result of likely imposition of special assessments and use fees by the District, will be the direct result of facilities and services provided by the District to the landowners within the District. However, as property ownership in the District is completely voluntary, all current property owners must consent to the establishment of the District and all initial prospective buyers will have such additional transaction costs disclosed to them prior to sale, as required by State law. Such costs, however, should be considered voluntary, self-imposed, and as a tradeoff for the service and facilities provided by the District.

The District will incur overall operational costs related to services for infrastructure maintenance, landscaping, and similar items. In the initial stages of development, the costs will likely be minimized. These operating costs will be funded by the landowners through direct funding agreements or special assessments levied by the District. Similarly, the District may incur costs associated with the issuance and repayment of special assessment revenue bonds. While these costs in the aggregate may approach the stated threshold over a five year period, this would not be unusual for a Project of this nature and the infrastructure and services proposed to be provided by the District will be needed to serve the Project regardless of the existence of the District. Thus, the District-related costs are not additional development costs. Due to the relatively low cost of financing available to CDDs, due to the tax-exempt nature of their debt, certain improvements can be provided more efficiently by the District than by alternative entities. Furthermore, it is important to remember that such costs would be funded through special assessments paid by landowners within the District, and would not be a burden on the taxpayers outside the District.

**3.0 A good faith estimate of the number of individuals and entities likely to be required to comply with the ordinance, together with a general description of the types of individuals likely to be affected by the ordinance.**

The individuals and entities likely to be required to comply with the ordinance or affected by the proposed action (i.e., adoption of the ordinance) can be categorized, as follows: 1) The State of Florida and its residents, 2) the Town of Howey-In-the-Hills and its residents, 3) current property owners, and 4) future property owners.

a. The State of Florida

The State of Florida and its residents and general population will not incur any compliance costs related to the establishment and on-going administration of the District, and will only be affected to the extent that the State incurs those nominal administrative costs outlined herein. The cost of any additional administrative services provided by the State as a result of this project will be incurred whether the infrastructure is financed through a CDD or any alternative financing method.

b. Town of Howey-In-the-Hills

The Town and its residents not residing within the boundaries of the District will not incur any compliance costs related to the establishment and on-going administration of the District other than any one-time administrative costs outlined herein, which will be offset by the filing fee submitted to the Town. Once the District is established, these residents will not be affected by adoption of the ordinance. The cost of any additional administrative services provided by the Town as a result of this development will be incurred whether the infrastructure is financed through a CDD or any alternative financing method.

c. Current Property Owners

The current property owners of the lands within the proposed District boundaries will be affected to the extent that the District allocates debt for the construction of infrastructure and undertakes operation and maintenance responsibility for that infrastructure. However, all current property owners have consented to the establishment of the District.

d. Future Property Owners

The future property owners are those who will own property in the proposed District. These future property owners will be affected to the extent that the District allocates debt for the construction of infrastructure and undertakes operation and maintenance responsibility for that infrastructure. The proposed District will serve land that comprises an approximately 221.34 +/- acre master planned residential development currently anticipated to contain a total of approximately 571 residential dwelling units, although the development plan can change. Assuming an average density of 3.5 persons per residential dwelling unit, the estimated residential population of the proposed District at build out would be approximately 1,999 +/- and all of these residents as well as the residential and non-residential landowners within the District will be affected by the ordinance. The Town, the proposed District and certain state agencies will also be affected by or required to comply with the ordinance as more fully discussed hereafter.

**4.0 A good faith estimate of the cost to the agency, and to any other state and local government entities, of implementing and enforcing the proposed ordinance, and any anticipated effect on state or local revenues.**

The Town is establishing the District by ordinance in accordance with the Act and, therefore, there is no anticipated effect on state or local revenues.

**4.1 Costs to Governmental Agencies of Implementing and Enforcing Ordinance**

Because the result of adopting the ordinance is the establishment of an independent local special purpose government, there will be no significant enforcing responsibilities of any other government entity, but there will be various implementing responsibilities which are identified with their costs herein.

State Governmental Entities

The cost to state entities to review or enforce the proposed ordinance will be very modest. The District comprises less than 2,500 acres and is located within the boundaries of the Town of Howey-In-the-Hills. Therefore, the Town (and not the Florida Land and Water Adjudicatory Commission) will review and act upon the Petition to establish the District, in accordance with Section 190.005(2), F.S. There are minimal additional ongoing costs to various state entities to implement and enforce the proposed ordinance. The costs to various state entities to implement and enforce the proposed ordinance relate strictly to the receipt and processing of various reports that the District is required to file with the State and its various entities. Appendix A lists the reporting requirements. The costs to those state agencies that will receive and process the District's reports are minimal because the District is only one of many governmental units that are required to submit the various reports. Therefore, the marginal cost of processing one additional set of reports is inconsequential. Additionally, pursuant to section 189.064, F.S., the District must pay an annual fee to the State of Florida Department of Economic Opportunity which offsets such costs.

Town of Howey-In-the-Hills, Florida

The proposed land for the District is located within the Town of Howey-In-the-Hills, Florida and consists of less than 2,500 acres. The Town and its staff may process, analyze, conduct a public hearing, and vote upon the petition to establish the District. These activities will absorb some resources; however, these costs incurred by the Town will be modest for a number of reasons. First, review of the petition to establish the District does not include analysis of the project itself. Second, the petition itself provides most, if not all, of the information needed for a staff review. Third, the Town already possesses the staff needed to conduct the review without the need for new staff. Fourth, there is no capital required to review the petition. Fifth, the potential costs are offset by a filing fee included with the petition to offset any expenses the Town may incur in the processing of this petition. Finally, the Town already processes similar petitions, though for entirely different subjects, for land uses and zoning changes that are far more complex than the petition to establish a community development district.

The annual costs to the Town, because of the establishment of the District, are also very small. The District is an independent unit of local government. The only annual costs the Town faces are the minimal costs of receiving and reviewing the various reports that the District is required to provide to

the Town, or any monitoring expenses the Town may incur if it establishes a monitoring program for this District.

## **4.2 Impact on State and Local Revenues**

Adoption of the proposed ordinance will have no negative impact on state or local revenues. The District is an independent unit of local government. It is designed to provide infrastructure facilities and services to serve the development project and it has its own sources of revenue. No state or local subsidies are required or expected.

Any non-ad valorem assessments levied by the District will not count against any millage caps imposed on other taxing authorities providing services to the lands within the District. It is also important to note that any debt obligations the District may incur are not debts of the State of Florida or any other unit of local government. By Florida law, debts of the District are strictly its own responsibility.

## **5.0 A good faith estimate of the transactional costs likely to be incurred by individuals and entities, including local government entities, required to comply with the requirements of the ordinance.**

Table 1 provides an outline of the various facilities and services the proposed District may provide. Financing for these facilities is projected to be provided by the District.

Table 2 illustrates the estimated costs of construction of the capital facilities, outlined in Table 1. Total costs of construction for those facilities that may be provided are estimated to be approximately \$75,271,790. The District may levy non-ad valorem special assessments (by a variety of names) and may issue special assessment bonds to fund the costs of these facilities. These bonds would be repaid through non-ad valorem special assessments levied on all developable properties in the District that may benefit from the District's infrastructure program as outlined in Table 2.

Prospective future landowners in the proposed District may be required to pay non-ad valorem special assessments levied by the District to provide for facilities and secure any debt incurred through bond issuance. In addition to the levy of non-ad valorem special assessments which may be used for debt service, the District may also levy a non-ad valorem assessment to fund the operations and maintenance of the District and its facilities and services. However, purchasing a property within the District or locating in the District by new residents is completely voluntary, so, ultimately, all landowners and residents of the affected property choose to accept the non-ad valorem assessments as a tradeoff for the services and facilities that the District will provide. In addition, state law requires all assessments levied by the District to be disclosed by the initial seller to all prospective purchasers of property within the District.

**Table 1**

**LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT  
Proposed Facilities and Services**

<b>FACILITY</b>	<b>FUNDED BY</b>	<b>OWNED BY</b>	<b>MAINTAINED BY</b>
Public Roadways	CDD/Developer	Howey In The Hills	Howey In The Hills
Public Sitework and Storm Drainage	CDD/Developer	CDD	CDD
Water, Reclaimed and Wastewater Systems	CDD/Developer	Howey In The Hills	Howey In The Hills
Hardscaping, Landscaping, Irrigation	CDD/Developer	CDD	CDD
Differential Cost of Undergrounding Conduit	CDD/Developer	CDD	CDD
On-Site Wetland Mitigation	CDD/Developer	CDD	CDD
Off-site Improvements	CDD/Developer	Howey/ Lake County/ FDOT	Howey/ Lake County/ FDOT

**Table 2**

**LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT  
Estimated Costs of Construction**

<b>CATEGORY</b>	<b>COST</b>
Public Roadways	\$14,846,000
Public Sitework and Storm Drainage	\$14,275,000
Water, Reclaimed and Wastewater Systems	\$28,550,000
Hardscaping, Landscaping, Irrigation	\$4,910,600
Differential Cost of Undergrounding Conduit	\$3,597,300
On-Site Wetland Mitigation	\$150,000
Off-site Improvements	\$600,000
Professional Services	\$1,500,000
Contingency	\$6,842,890
<b>Infrastructure Cost Total</b>	<b>\$75,271,790</b>

A CDD provides the property owners with an alternative mechanism of providing public services; however, special assessments and other impositions levied by the District and collected by law represent the transactional costs incurred by landowners as a result of the establishment of the District. Such transactional costs should be considered in terms of costs likely to be incurred under alternative public and private mechanisms of service provision, such as other independent special

districts, Town or its dependent districts, or Town management but financing with municipal service benefit units and municipal service taxing units, or private entities, all of which can be grouped into three major categories: public district, public other, and private.

With regard to the public services delivery, dependent and other independent special districts can be used to manage the provision of infrastructure and services, however, they are limited in the types of services they can provide, and likely it would be necessary to employ more than one district to provide all services needed by the development.

Other public entities, such as cities, are also capable of providing services, however, their costs in connection with the new services and infrastructure required by the new development and, transaction costs, would be borne by all taxpayers, unduly burdening existing taxpayers. Additionally, other public entities providing services would also be inconsistent with the State's policy of "growth paying for growth".

Lastly, services and improvements could be provided by private entities. However, their interests are primarily to earn short-term profits and there is no public accountability. The marginal benefits of tax-exempt financing utilizing CDDs would cause the CDD to utilize its lower transactional costs to enhance the quality of infrastructure and services.

In considering transactional costs of CDDs, it shall be noted that occupants of the lands to be included within the District will receive three major classes of benefits.

First, those residents in the District will receive a higher level of public services which in most instances will be sustained over longer periods of time than would otherwise be the case.

Second, a CDD is a mechanism for assuring that the public services will be completed concurrently with development of lands within the development. This satisfies the State's growth management policy, and it assures that growth pays for itself without undue burden on other consumers. Establishment of the District will ensure that these landowners pay for the provision of facilities, services and improvements to these lands.

Third, a CDD is the sole form of local governance which is specifically established to provide District landowners with planning, construction, implementation and short and long-term maintenance of public infrastructure at sustained levels of service.

The cost impact on the ultimate landowners in the development is not the total cost for the District to provide infrastructure services and facilities. Instead, it is the incremental costs above, if applicable, what the landowners would have paid to install infrastructure via an alternative financing mechanism.

Consequently, a CDD provides property owners with the option of having higher levels of facilities and services financed through self-imposed revenue. The District is an alternative means to manage necessary development of infrastructure and services with related financing powers. District management is no more expensive, and often less expensive, than the alternatives of various public and private sources.

## **6.0 An analysis of the impact on small businesses as defined by Section 288.703, F.S., and an analysis of the impact on small counties and small cities as defined by Section 120.52, F.S.**

There will be little impact on small businesses because of the establishment of the District. If anything, the impact may be positive because the District must competitively bid all of its contracts and competitively negotiate all of its contracts with consultants over statutory thresholds. This affords small businesses the opportunity to bid on District work.

The Town of Howey-In-the-Hills has a population of 1,098 according to the Census 2010 conducted by the United States Census Bureau and is therefore defined as a "small" Town according to Section 120.52, F.S. It can be reasonably expected that the establishment of a community development district for the Lake Hills development will not produce any marginal effects that would be different from those that would have occurred if the Lake Hills development was developed without a community development district established for it by the Town.

## **7.0 Any additional useful information.**

The analysis provided above is based on a straightforward application of economic theory, especially as it relates to tracking the incidence of regulatory costs and benefits. Inputs were received from the Petitioner's Engineer and other professionals associated with the Petitioner.

In relation to the question of whether the proposed Lake Hills Community Development District is the best possible alternative to provide public facilities and services to the project, there are several additional factors which bear importance. As an alternative to an independent district, the Town could establish a dependent district for the area or establish an MSBU or MSTU. Either of these alternatives could finance the improvements contemplated in Tables 1 and 2 in a fashion similar to the proposed District.

There are a number of reasons why a dependent district is not the best alternative for providing public facilities and services to the Lake Hills development. First, unlike a CDD, this alternative would require the Town to administer the project and its facilities and services. As a result, the costs for these services and facilities would not be directly and wholly attributed to the land directly benefiting from them, as the case would be with a CDD. Administering a project of the size and complexity of the development program anticipated for the Lake Hills development is a significant and expensive undertaking.

Second, a CDD is preferable from a government accountability perspective. With a CDD, residents and landowners in the District would have a focused unit of government ultimately under their direct control. The CDD can then be more responsive to resident needs without disrupting other Town responsibilities. By contrast, if the Town were to establish and administer a dependent Special District, then the residents and landowners of the Lake Hills development would take their grievances and desires to the Town Council meetings.

Third, any debt of an independent CDD is strictly that District's responsibility. While it may be technically true that the debt of a Town-established, dependent Special District is not strictly the Town's responsibility, any financial problems that a dependent Special District may have may reflect on the Town. This will not be the case if a CDD is established.

Another alternative to a CDD would be for a Property Owners' Association (POA) to provide the infrastructure as well as operations and maintenance of public facilities and services. A CDD is superior to a POA for a variety of reasons. First, unlike a POA, a CDD can obtain low cost funds from the municipal capital market. Second, as a government entity a CDD can impose and collect its assessments along with other property taxes on the County's real estate tax bill. Therefore, the District



is far more assured of obtaining its needed funds than is a POA. Third, the proposed District is a unit of local government. This provides a higher level of transparency, oversight and accountability and the CDD has the ability to enter into interlocal agreements with other units of government.

**8.0 A description of any regulatory alternatives submitted under section 120.541(1)(a), F.S., and a statement adopting the alternative or a statement of the reasons for rejecting the alternative in favor of the proposed ordinance.**

No written proposal, statement adopting an alternative or statement of the reasons for rejecting an alternative have been submitted.

Based upon the information provided herein, this Statement of Estimated Regulatory Costs supports the petition to establish the Lake Hills Community Development District.

**APPENDIX A  
LIST OF REPORTING REQUIREMENTS**

<b>REPORT</b>	<b>FL. STATUTE CITATION</b>	<b>DATE</b>
Annual Financial Audit	190.008/218.39	9 months after end of Fiscal Year
Annual Financial Report	190.008/218.32	45 days after the completion of the Annual Financial Audit but no more than 9 months after end of Fiscal Year
TRIM Compliance Report	200.068	no later than 30 days following the adoption of the property tax levy ordinance/resolution (if levying property taxes)
Form 1 - Statement of Financial Interest	112.3145	within 30 days of accepting the appointment, then every year thereafter by 7/1 (by "local officers" appointed to special district's board); during the qualifying period, then every year thereafter by 7/1 (by "local officers" elected to special district's board)
Public Facilities Report	189.08	within one year of special district's creation; then annual notice of any changes; and updated report every 7 years, 12 months prior to submission of local government's evaluation and appraisal report
Public Meetings Schedule	189.015	quarterly, semiannually, or annually
Bond Report	218.38	when issued; within 120 days after delivery of bonds
Registered Agent	189.014	within 30 days after first meeting of governing board
Proposed Budget	190.008	annually by June 15
Adopted Budget	190.008	annually by October 1
Public Depositor Report	280.17	annually by November 30
Notice of Establishment	190.0485	within 30 days after the effective date of an ordinance establishing the District
Notice of Public Financing	190.009	file disclosure documents in the property records of the county after financing

EXHIBIT 8

AUTHORIZATION OF AGENT

I, Dean Barberree, as President of Reader & Partners, LLC , a Florida limited liability company, (the "Petitioner"), on behalf of the company hereby designate Mark A. Watts, Esq., to act as agent for Reader & Partners, LLC, with regard to any and all matters pertaining to the Petition to establish the Lake Hills Community Development District ("CDD") pursuant to Fla. Stat. §190. This authorization shall remain in effect until revoked in writing.

Kimberly Locher  
Signature

KIMBERLY LOCHER  
Print Name:

Mark A. Watts  
Signature

Mark A. Watts  
Print Name:

Reader & Partners, LLC, a Florida limited liability company

By: [Signature]  
Dean Barberree, President

STATE OF FLORIDA  
COUNTY OF Orange

The foregoing instrument was acknowledged before me by physical presence this 16th day of November, 2023, by Dean Barberree as President of Reader & Partners, LLC, on behalf of said limited liability company, who is personally known to me or who has produced \_\_\_\_\_ as identification.

Marlene Demarco  
NOTARY PUBLIC, STATE OF FLORIDA

MARLENE DEMARCO  
Type or Print Name  
Commission No. HH 276999  
My Commission Expires: 6/16/2026



**ADDENDUM NO. 1 TO THE PETITION TO ESTABLISH THE  
LAKE HILLS COMMUNITY DEVELOPMENT DISTRICT  
(SECTIONS 190.011 and 190.012(1), *FLORIDA STATUTES*)**

## Addendum No. 1

**Florida Statutes § 190.011 General powers.**--The district shall have, and the board may exercise, the following powers:

- (1) To sue and be sued in the name of the district; to adopt and use a seal and authorize the use of a facsimile thereof; to acquire, by purchase, gift, devise, or otherwise, and to dispose of, real and personal property, or any estate therein; and to make and execute contracts and other instruments necessary or convenient to the exercise of its powers.
- (2) To apply for coverage of its employees under the state retirement system in the same manner as if such employees were state employees, subject to necessary action by the district to pay employer contributions into the state retirement fund.
- (3) To contract for the services of consultants to perform planning, engineering, legal, or other appropriate services of a professional nature. Such contracts shall be subject to public bidding or competitive negotiation requirements as set forth in s. 190.033.
- (4) To borrow money and accept gifts; to apply for and use grants or loans of money or other property from the United States, the state, a unit of local government, or any person for any district purposes and enter into agreements required in connection therewith; and to hold, use, and dispose of such moneys or property for any district purposes in accordance with the terms of the gift, grant, loan, or agreement relating thereto.
- (5) To adopt rules and orders pursuant to the provisions of chapter 120 prescribing the powers, duties, and functions of the officers of the district; the conduct of the business of the district; the maintenance of records; and the form of certificates evidencing tax liens and all other documents and records of the district. The board may also adopt administrative rules with respect to any of the projects of the district and define the area to be included therein. The board may also adopt resolutions which may be necessary for the conduct of district business.
- (6) To maintain an office at such place or places as it may designate within a county in which the district is located or within the boundaries of a development of regional impact or a Florida Quality Development, or a combination of a development of regional impact and a Florida Quality Development, which includes the district, which office must be reasonably accessible to the landowners. Meetings pursuant to s. 189.417(3) of a district within the boundaries of a development of regional impact or Florida Quality Development, or a combination of a development of regional impact and a Florida Quality Development, may be held at such office.
- (7)
  - (a) To hold, control, and acquire by donation, purchase, or condemnation, or dispose of, any public easements, dedications to public use, platted reservations for public purposes, or any reservations for those purposes authorized by this act and to make use of such easements, dedications, or reservations for any of the purposes authorized by this act.
  - (b) When real property in the district is owned by a governmental entity and subject to a ground lease as described in s. 190.003(14), to collect ground rent from landowners

pursuant to a contract with such governmental entity and to contract with the county tax collector for collection of such ground rent using the procedures authorized in s. 197.3631, other than the procedures contained in s. 197.3632.

(8) To lease as lessor or lessee to or from any person, firm, corporation, association, or body, public or private, any projects of the type that the district is authorized to undertake and facilities or property of any nature for the use of the district to carry out any of the purposes authorized by this act.

(9) To borrow money and issue bonds, certificates, warrants, notes, or other evidence of indebtedness as hereinafter provided; to levy such tax and special assessments as may be authorized; and to charge, collect, and enforce fees and other user charges.

(10) To raise, by user charges or fees authorized by resolution of the board, amounts of money which are necessary for the conduct of the district activities and services and to enforce their receipt and collection in the manner prescribed by resolution not inconsistent with law.

(11) To exercise within the district, or beyond the district with prior approval by resolution of the governing body of the county if the taking will occur in an unincorporated area or with prior approval by resolution of the governing body of the municipality if the taking will occur within a municipality, the right and power of eminent domain, pursuant to the provisions of chapters 73 and 74, over any property within the state, except municipal, county, state, and federal property, for the uses and purposes of the district relating solely to water, sewer, district roads, and water management, specifically including, without limitation, the power for the taking of easements for the drainage of the land of one person over and through the land of another.

(12) To cooperate with, or contract with, other governmental agencies as may be necessary, convenient, incidental, or proper in connection with any of the powers, duties, or purposes authorized by this act.

(13) To assess and impose upon lands in the district ad valorem taxes as provided by this act.

(14) To determine, order, levy, impose, collect, and enforce special assessments pursuant to this act and chapter 170. Such special assessments may, in the discretion of the district, be collected and enforced pursuant to the provisions of ss. 197.3631, 197.3632, and 197.3635, chapter 170, or chapter 173.

(15) To exercise all of the powers necessary, convenient, incidental, or proper in connection with any of the powers, duties, or purposes authorized by this act.

(16) To exercise such special powers as may be authorized by this act.

**Florida Statutes § 190.012 Special powers; public improvements and community facilities.-**

-The district shall have, and the board may exercise, subject to the regulatory jurisdiction and permitting authority of all applicable governmental bodies, agencies, and special districts having authority with respect to any area included therein, any or all of the following special powers relating to public improvements and community facilities authorized by this act:

(1) To finance, fund, plan, establish, acquire, construct or reconstruct, enlarge or extend, equip, operate, and maintain systems, facilities, and basic infrastructures for the following:

(a) Water management and control for the lands within the district and to connect some or any of such facilities with roads and bridges.

(b) Water supply, sewer, and wastewater management, reclamation, and reuse or any combination thereof, and to construct and operate connecting intercepting or outlet sewers and sewer mains and pipes and water mains, conduits, or pipelines in, along, and under any street, alley, highway, or other public place or ways, and to dispose of any effluent, residue, or other byproducts of such system or sewer system.

(c) Bridges or culverts that may be needed across any drain, ditch, canal, floodway, holding basin, excavation, public highway, tract, grade, fill, or cut and roadways over levees and embankments, and to construct any and all of such works and improvements across, through, or over any public right-of-way, highway, grade, fill, or cut.

(d) 1. District roads equal to or exceeding the applicable specifications of the county in which such district roads are located; roads and improvements to existing public roads that are owned by or conveyed to the local general-purpose government, the state, or the Federal Government; street lights; alleys; landscaping; hardscaping; and the undergrounding of electric utility lines. Districts may request the underground placement of utility lines by the local retail electric utility provider in accordance with the utility's tariff on file with the Public Service Commission and may finance the required contribution.

2. Buses, trolleys, transit shelters, ridesharing facilities and services, parking improvements, and related signage.

(e) Investigation and remediation costs associated with the cleanup of actual or perceived environmental contamination within the district under the supervision or direction of a competent governmental authority unless the covered costs benefit any person who is a landowner within the district and who caused or contributed to the contamination.

(f) Conservation areas, mitigation areas, and wildlife habitat, including the maintenance of any plant or animal species, and any related interest in real or personal property.

(g) Any other project within or without the boundaries of a district when a local government issued a development order pursuant to s. 380.06 or s. 380.061 approving or expressly requiring the construction or funding of the project by the district, or when the

project is the subject of an agreement between the district and a governmental entity and is consistent with the local government comprehensive plan of the local government within which the project is to be located.

(h) Any other project, facility, or service required by a development approval, interlocal agreement, zoning condition, or permit issued by a governmental authority with jurisdiction in the district.