

Beyond the Homeowners Association:

Blending Community Development Districts, Tax Exempt Organizations and Commercial POA's for Larger Planned Communities

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*Prepared for the
Twenty-Eighth Institute on Condominium and Cluster Developments
Miami, Florida
October 30, 2003*

I. Introduction

In a growing number of communities, the roles previously filled by a homeowners association (“HOA”) are being separated into their component parts and handed off to other entities. Part of this trend is related to the movement toward communities that integrate both commercial and residential uses, as homeowners’ associations, which are regulated under Chapter 720, Florida Statutes, are not suited for the complex needs of mixed-use communities. In other cases, the other entities offer financial benefits to the developer that an HOA cannot. And in some instances, the intentions, at least in part, are philanthropic, motivated by a desire to add another dimension to the community.

Although these different entities are likely to be found mostly in larger planned communities, they may be used in projects smaller than 100 acres, particularly New Urbanist projects, which are high-density, mixed-use developments.

This article is not a scholarly essay with lots of footnotes, nor is it a complete “how to” manual. Each of these types of entities has inspired specialized legal practices and volumes of esoteric documentation. Furthermore, this area of the law is evolving and little case law is available. For that reason, this article is based in large part on interviews with developers and legal or tax practitioners. My intent is to give real estate attorneys some familiarity with these entities and how and why they might be used in a real estate development.

II. Community Development Districts

A Community Development District, or CDD, is an independent local unit of special purpose government created under Chapter 190, Florida Statutes, enacted in 1980. CDDs smaller than 1,000 acres are formed by an ordinance adopted by the county commission. Larger districts are formed by petition to the Florida Land and Water Adjudicatory Commission. Once formed, a CDD can issue tax-exempt bonds to pay for infrastructure, such as roads, water and sewer and storm-water management, parks and recreational facilities. The tax-free bonds carry an interest rate that is generally below non-tax-exempt market rates. To repay such bonds and its ongoing expenses, the CDD levies assessments, which are enforceable in the same manner as county taxes. A CDD does not have the power to adopt a comprehensive plan, building code or land development code.

Number is Growing. The number of Community Development Districts has been growing exponentially: When the Orlando Sentinel did an award-winning investigatory series on CDDs in October 2000, there were only 116. As of the end of September 2003, the number had grown to 213, according to the Florida Department of Community Affairs website at www.floridaspecialdistricts.org. (Two were added during the time this author conducted research for this article.) The districts are scattered throughout the state. Hillsborough County has by far the most, and Collier, Lee, Manatee, Osceola, Pasco and St. Lucie counties have a disproportionate number relative to their population.

Period of Developer Control. The developer controls the CDD for at least the first six years of its life and sometimes longer. During the first six years, voting is by landowners according to acreage—one vote for each acre or fraction of an acre owned in the district. For districts up to 5,000 acres in size, all registered voters within the district get an equal vote starting in the sixth year—but only if there are at least 250 such voters. If there are not 250 registered voters within the district at six years, the voting by acreage continues until there are 250 voters. §190.006.

How CDDs Assess. CDDs raise money by assessments, which appear on the homebuyer's regular county tax bill. The assessments levied by most CDDs are **non-ad valorem assessments**—that is, the assessments are not based on the assessed value of the property, but rather are, in the language of the statute, “apportioned in proportion to the benefit received by each tract of land.” It is up to each CDD, with the help of its economic advisor, to determine how to divide the assessments among the various types of property within a community. The statute permits both ad valorem and non-ad valorem assessments, but most CDDs use non-ad valorem assessments, perhaps because boards elected by acreage may assess only non-ad valorem assessments. §190.021.

CDDs can make two different types of non-ad valorem assessments: **benefit special assessments** to reimburse the bondholders for capital improvements, and **maintenance special assessments** for the CDD's operating costs. Sometimes the developer will pay off all or part of the benefit special assessment when selling a lot to a homebuyer. If not, the homebuyer is left with the responsibility of paying off the benefit special assessment for the original infrastructure improvements, which is a lien on the property. A CDD can

impose new benefit special assessments if it makes more improvements. Maintenance special assessments for the CDD's ongoing expenses are billed annually. §190.021.

Public or Private? In the past, developers funded elaborate recreational facilities such as golf courses and resort-type swimming pool complexes using CDD bond revenue, and then limited their use to CDD residents or made nonresidents distinctly unwelcome in other ways. Sometimes, these facilities were within gated communities.

It is now generally agreed that CDD streets cannot be gated, and that parks and other recreational facilities must be open to the public. Chapter 190 makes no mention of whether these facilities must be open to the public. Instead, the requirement originates with the IRS. In the late 1990's, in a case that involved a special taxing district similar to a CDD, the IRS ruled that the interest paid to bondholders would not be tax exempt unless district facilities built with the bonds are open to the public. In preparing the bond issue, a certification must be given to the IRS, assuring that the facilities funded by the bonds are public.

Whether or not a user fee can be charged to non-residents, and how much, is an open question. Some developers now avoid the issue by funding ungated streets, common area landscaping and utilities through the CDD while keeping recreational facilities in the HOA. In a larger community that includes gated enclaves, the gated streets may be maintained by the HOA and the remainder by the CDD.

| County | # CDDs | Population in 1,000s |
|--------------|--------|----------------------|
| Hillsborough | 24 | 1054 |
| Lee | 20 | 476 |
| Pasco | 16 | 371 |
| St. Lucie | 14 | 205 |
| Collier | 13 | 277 |
| Miami-Dade | 13 | 2333 |
| Osceola | 12 | 182 |
| Manatee | 12 | 281 |
| Palm Beach | 12 | 1190 |
| Broward | 12 | 1709 |
| Orange | 11 | 946 |
| St. Johns | 6 | 136 |
| Lake | 6 | 234 |
| Polk | 6 | 499 |
| Marion | 5 | 273 |
| Brevard | 4 | 496 |
| Sumter | 3 | 58 |
| Clay | 3 | 152 |
| Leon | 3 | 244 |
| Sarasota | 3 | 340 |
| Flagler | 2 | 57 |
| Hernando | 2 | 138 |
| Charlotte | 2 | 149 |
| Bay | 2 | 152 |
| Pinellas | 2 | 927 |
| Multi | 1 | |
| Walton | 1 | 44 |
| Seminole | 1 | 382 |
| Volusia | 1 | 459 |
| Duval | 1 | 806 |
| TOTAL | 213 | |

Required Disclosure. The purchase and sale agreement for land within a CDD must include statutory disclosure language:

190.048 Sale of real estate within a district; required disclosure to purchaser.--Subsequent to the establishment of a district under this chapter, each contract for the initial sale of a parcel of real property and each contract for the initial sale of a residential unit within the district shall include, immediately prior to the space reserved in the contract for the signature of the purchaser, the

following disclosure statement in boldfaced and conspicuous type which is larger than the type in the remaining text of the contract: "THE (Name of District) COMMUNITY DEVELOPMENT DISTRICT MAY IMPOSE AND LEVY TAXES OR ASSESSMENTS, OR BOTH TAXES AND ASSESSMENTS, ON THIS PROPERTY. THESE TAXES AND ASSESSMENTS PAY THE CONSTRUCTION, OPERATION, AND MAINTENANCE COSTS OF CERTAIN PUBLIC FACILITIES AND SERVICES OF THE DISTRICT AND ARE SET ANNUALLY BY THE GOVERNING BOARD OF THE DISTRICT. THESE TAXES AND ASSESSMENTS ARE IN ADDITION TO COUNTY AND OTHER LOCAL GOVERNMENTAL TAXES AND ASSESSMENTS AND ALL OTHER TAXES AND ASSESSMENTS PROVIDED FOR BY LAW."

Coordination with HOA. Depending on the build-out, the developer may have control of the homeowners association longer than the CDD, or vice versa. Although the CDD can take over most if not all of the physical maintenance duties normally assigned to a homeowners association, the HOA still has a role to play in covenant enforcement and architectural review, which cannot be done by a CDD. Because at build-out the HOA and the CDD represent essentially the same constituency, the drafter of the HOA documents may also want to facilitate cooperation between the entities, giving flexibility to allow common areas to be conveyed, or maintenance responsibility shifted, between the CDD and the HOA, depending on how the law evolves and the relative advantages of each.

Used or Abused? Some developers believe that the CDD gives them a competitive advantage. For instance, two lots in different subdivisions may each sell for \$60,000, but the lot in the CDD may also have a lien for \$15,000 in benefit special assessments. In some cases, the lien will allow for better quality improvements than the developer could otherwise afford, resulting in a nicer looking community, while in other cases, the lien simply allows the developer to shift infrastructure costs to the consumer. Such developers believe that even when the existence of the lien is adequately disclosed, consumers still pick the lot with the lien.

The dark underside is the potential for abuse. The Orlando Sentinel series described instances in which developers have sold improvements to the CDD, which they control, at inflated prices. The website Cyber Citizens for Justice, www.ccfj.net/CDDComm.html opines as follows:

Community Development Districts are getting more and more popular among politicians, developers and the whole connected industry. Local politicians love them, figuring they get all the future property taxes without having to invest anything. Developers can create their own little kingdoms without being supervised. They can write their own ticket and make huge profits without any big risks to them. The public bonds will finance all the necessary investments and if financial losses can't be avoided the homes of the people are the collateral for possible losses. Miscalculation from developers can be covered with money from the homeowners.

III. Charitable Organizations under 501(c)(3)

Charitable organizations qualified under 501(c)(3) of the Internal Revenue Code are not only themselves exempt from taxation, but contributors are allowed to deduct most contributions they make to such an organization. This makes them a powerful tool for the developer whose project aligns itself with a 501(c)(3)'s exempt purposes. Expenses that would otherwise have to be capitalized and recovered bit by bit as each lot is sold may, instead, be deducted currently. Moreover, having a charitable organization associated with a community can improve the development's appeal by providing concerts, festivals, classes and other community-building activities.

There are two ways for a development to benefit from a charitable organization—import a well-established organization, or grow its own.

- **Import a Tax-Exempt.** Tax-exempt organizations that are often invited into a community at the master plan stage include YMCA's, churches and private non-profit schools. Choosing the right tax-exempt organization can add value to the development. For example, donating land or a building to a Montessori school can be a good investment if lot buyers are likely to be young families to whom that kind of education would be appealing. (Any such conveyance should be deed restricted to ensure that the property isn't re-conveyed for other purposes.)

Importing a 501(c)(3) can offer immediate tax benefits. A developer who builds a community center and gives it to the HOA must capitalize the cost. A developer who donates land to a YMCA can deduct the cost currently. Furthermore, the deduction may be for the fair market value of the land, not the developer's basis.

- **Grow Your Own.** Some developers are creating their own tax-exempt organizations, which are named after and identified with their community, although most of its activities are open to the public. Usually these organizations have a primarily cultural mission that enhances the community.

Qualifying as a 501(c)(3). Organizations achieve exempt status through an application process with the IRS, and advance rulings are available to new organizations. The articles of incorporation of the corporation must limit the organization to an exempt purpose, or combination of purposes, and its assets must be permanently dedicated to exempt purposes. As stated in an IRS publication,

The exempt purposes set forth in IRC Section 501(c)(3) are charitable, religious, educational, scientific, literary, testing for public safety, fostering national or international amateur sports competition, and the prevention of cruelty to children or animals. The term charitable is used in its generally accepted legal sense and includes relief of the poor, the distressed, or the underprivileged; advancement of religion; advancement of education or science; erection or maintenance of public buildings, monuments, or works; lessening the burdens of government; lessening of neighborhood tensions; elimination of prejudice and discrimination; defense of

human and civil rights secured by law; and combating community deterioration and juvenile delinquency.

Most 501(c)(3) organizations associated with communities have an interest in the arts, which, although not listed above, is generally recognized as a charitable purpose. To be a 501(c)(3) organization, the activities must be open to the larger community, not just those within the real estate development. A private community can form a “social welfare organization” under 501(c)(4) of the Code to offer community-building activities, but this does not offer the same tax benefits to the developer.

Qualifying a 501(c)(3) as a Publicly Supported Organization. In order to achieve the most tax benefits, the 501(c)(3) organization must avoid private foundation status by affirmatively showing to the IRS that it is a publicly supported organization. To do that, the 501(c)(3) organization usually must demonstrate that over a five-year period, on average, the organization receives at least one third of its income from small contributors or the government, rather than from the developer or other related entities.

Some communities require a payment by homeowners to the community’s 501(c)(3) organization, either as a regular annual assessment or as a fixed amount or percentage paid upon each conveyance and re-conveyance of the property. Such payments, which are written into the recorded declaration, are generally well tolerated by buyers. There is mixed opinion among tax professionals as to whether such assessments are contributions that can be counted toward the one-third test, but most professionals believe that they are to be classified as contributions because the act of buying property in a particular community is voluntary. If so, establishing such assessments in the documents makes it relatively easy to qualify as a publicly supported organization.

Coordination with HOA. A 501(c)(3) organization operates independently of the HOA. Its board of directors will attract individuals with interests and personality different from the HOA board and may draw at least some directors from outside the community.

If the documents require assessments for the 501(c)(3) organization, then it may be efficient for the HOA to collect those assessments as agent for the 501(c)(3) organization. Even if the HOA acts as agent, it’s important to have the contributions made directly from the homebuyer to the 501(c)(3) organization, rather than to the HOA, so that in showing public support of the organization, the individual homebuyers are listed as contributors rather than the HOA.

Used or Abused? Like the CDD, the 501(c)(3) organization offers opportunities for abuse, primarily through the donation of property with inflated appraisals resulting in equally inflated deductions. However, it seems that in most cases, the activities of the 501(c)(3) organization offer positive benefits to the community. “The cultural part is a drawing card,” says one developer. “The community becomes more desirable because of the chapel, because of the theater. It’s intangible, but it’s real.”

Another developer says, “I absolutely would do it again. An HOA is consumed with maintaining the property and doesn’t have the time, energy or inclination to do this.” In that instance, the developer donated a green and a chapel-like meetinghouse to the charitable organization, and the organization is able to support many of its activities by renting the chapel and green for weddings. The homeowners also pay a small annual assessment to the 501(c)(3) organization, which focuses on the needs of children in the greater community and also offers free concerts.

IV. Commercial Property Owners’ Associations

Whether new urbanist or conventional in style, many new developments are mixed-use rather than solely residential. While combining commercial and residential property in the same community can make pleasant places to live, the two don’t belong in the same property owners’ association:

- **Chapter 720 and Developer Control.** If there is any residential property whatsoever in the association, the association operation gets pulled into Chapter 720, with its mandatory turnover and other requirements. The commercial area, on the other hand, may be best operated more like a shopping mall, with a dictatorial developer who controls indefinitely.
- **Tax Concerns.** Homeowners’ associations generally rely on Section 528 of the Internal Revenue Code, which exempts the association from paying taxes on assessment income, even when it is accrued from year to year in reserve accounts and is not offset by expenses. To qualify under Section 528, substantially all (85% or more) of the units, lots, or buildings must be used by individuals for residences. Mixing commercial property into an HOA can cause it to lose the Section 528 exemption. Associations can usually compensate with accounting methods, but must be aware of the need to do so.
- **Commercial Standards.** Commercial areas invite the public in. They get a lot of traffic and must be maintained to a high level of care. Squares and plazas in town center are likely to be used for farmers’ markets, festivals and commercial activity, while greens and other common areas within the residential portions are less likely to be used for such activities.

The commercial property documents contain detailed provisions concerning commercial operation, such as hours of operation and merchants’ associations, and have a different assessment scheme. Containing these provisions in a separate document allows the residential documents to be relatively conventional, improving acceptance by residential buyers and their lenders.

- **Human Nature.** Perhaps most importantly of all, the interests and perspectives of commercial and residential owners are irrevocably different. Setting up any kind of a situation where residential owners have any say over the commercial operation is a fundamental error.

Management entity or POA? Town centers and other commercial areas within a mixed-use community are not always operated by a property owners association (POA). Instead, the developer may elect a developer-controlled management entity. The choice between a management entity or a commercial property owners' association depends in large part upon the developer's long-term commercial objectives:

- **Management Entity.** Where the developer or a third party is interested in retaining a long-term financial interest in town center and plans to own or manage at least a portion of the commercial properties, a developer-controlled management entity may be considered. The management entity charges common area maintenance charges similar to CAM charges in a shopping mall to cover its expenses, and may strictly control the mix of tenants. The management entity may not itself be a profit center, but rather a vehicle for maintaining maximum control.
- **Owners' Association.** Where the developer would rather sell town center as individual building parcels and does not intend to retain a long-term interest, a commercial property owners' association may be established to own and maintain the common areas. A merchants' association may be a committee of the POA or a separate entity.

If the residential portion of the community is being developed first, the choice of structuring the commercial portion may be deferred until a later stage of development.

Coordination with HOA. Because each operates independent of the other, the HOA and the commercial POA or management entity should have clear bright lines of responsibility and jurisdiction. There may be agreements between the two for common maintenance of certain facilities such as an entrance area or a water management system. These should be thought out in advance based on the individual attributes of the property and the master plan and must be as unambiguous as possible. Documents for the residential portion should clearly disclose the plans for commercial development and make it plain that the homeowners will not govern the commercial portions.

V. Conclusion

The homeowners' association and all its various permutations, such as master and sub associations, have enjoyed an extended reign in the toolbox of development-oriented real property lawyers. However, homeowners associations have their limitations, and other choices may both improve the quality of life in the community and improve the developer's bottom line.

The author would like to thank the various legal and accounting professionals who took time to discuss ideas and the state of the art, including Erin Larrinaga, Mitchell Horowitz, and Chuck Sellars.

Florida Department of Community Affairs
 Division of Housing and Community Development
 Special District Information Program
 The Official List of Special Districts On-Line
www.florida.specialdistricts.org.

Special Districts By County, as of 9/26/2003

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| 1. | Bay | Lake Powell Residential Golf Community Development District |
| 2. | Bay | Pier Park Community Development District |
| 3. | Brevard | Baytree Community Development District |
| 4. | Brevard | Central Viera Community Development District |
| 5. | Brevard | Viera East Community Development District |
| 6. | Brevard | Walkabout Community Development District |
| 7. | Broward | Belmont Lakes Community Development District |
| 8. | Broward | Coral Bay Community Development District |
| 9. | Broward | Cypress Cove Community Development District |
| 10. | Broward | Griffin Lakes Community Development District |
| 11. | Broward | Harbour Lake Estates Community Development District |
| 12. | Broward | Maple Ridge Community Development District |
| 13. | Broward | Meadow Pines Community Development District |
| 14. | Broward | Oakridge Community Development District |
| 15. | Broward | Turtle Run Community Development District |
| 16. | Broward | Vizcaya Community Development District |
| 17. | Broward | Walnut Creek Community Development District |
| 18. | Broward | West Lake Community Development District |
| 19. | Charlotte | Heritage Oak Park Community Development District |
| 20. | Charlotte | Riverwood Community Development District |
| 21. | Clay | Crossings At Fleming Island Community Development District |
| 22. | Clay | Double Branch Community Development District |
| 23. | Clay | Fleming Island Plantation Community Development District |
| 24. | Collier | Cedar Hammock Community Development District |
| 25. | Collier | Fiddler's Creek Community Development District |
| 26. | Collier | Fiddler's Creek Community Development District #2 |
| 27. | Collier | Flow Way Community Development District |
| 28. | Collier | Heritage Greens Community Development District |
| 29. | Collier | Key Marco Community Development District |
| 30. | Collier | Lely Community Development District |
| 31. | Collier | Mediterra South Community Development District |
| 32. | Collier | Naples Heritage Community Development District |
| 33. | Collier | Pelican Marsh Community Development District |
| 34. | Collier | Pine Air Lakes Community Development District |
| 35. | Collier | Port of The Islands Community Improvement District |

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| 36. | Collier | Tuscany Reserve Community Development District |
| 37. | Duval | Bartram Springs Community Development District |
| 38. | Flagler | Dunes Community Development District |
| 39. | Flagler | Grand Haven Community Development District |
| 40. | Hernando | Killarney Community Development District |
| 41. | Hernando | Sterling Hill Community Development District |
| 42. | Hillsborough | Arbor Greene Community Development District |
| 43. | Hillsborough | Cheval West Community Development District |
| 44. | Hillsborough | Citrus Park Community Development District |
| 45. | Hillsborough | Cory Lakes Community Development District |
| 46. | Hillsborough | Covington Park Community Development District |
| 47. | Hillsborough | Fishhawk Community Development District |
| 48. | Hillsborough | Fishhawk Community Development District II |
| 49. | Hillsborough | Harbor Bay Community Development District |
| 50. | Hillsborough | Harbour Isles Community Development District |
| 51. | Hillsborough | Heritage Harbor Community Development District |
| 52. | Hillsborough | Heritage Isles Community Development District |
| 53. | Hillsborough | Lake St. Charles Community Development District |
| 54. | Hillsborough | Live Oak No. 1 Community Development District |
| 55. | Hillsborough | Live Oak No. 2 Community Development District |
| 56. | Hillsborough | Palm Bay Community Development District |
| 57. | Hillsborough | Panther Trace Community Development District |
| 58. | Hillsborough | Park Place Community Development District |
| 59. | Hillsborough | Parkway Center Community Development District |
| 60. | Hillsborough | Rivercrest Community Development District |
| 61. | Hillsborough | Tampa Palms Community Development District |
| 62. | Hillsborough | Tampa Palms Open Space & Transportation CDD |
| 63. | Hillsborough | Waterchase Community Development District |
| 64. | Hillsborough | Westchase Community Development District |
| 65. | Hillsborough | Westchase East Community Development District |
| 66. | Lake | Central Lake Community Development District |
| 67. | Lake | Country Club of Mount Dora Community Development District |
| 68. | Lake | Country Greens Community Development District |
| 69. | Lake | Deer Island Community Development District |
| 70. | Lake | Southlake Community Development District |
| 71. | Lake | Village Center Community Development District |
| 72. | Lee | Bay Creek Community Development District |
| 73. | Lee | Bayside Improvement Community Development District |
| 74. | Lee | Brooks of Bonita Springs Community Development District |
| 75. | Lee | Brooks of Bonita Springs II Community Development District |
| 76. | Lee | CFM Community Development District |
| 77. | Lee | Cascades Estero Community Development District |
| 78. | Lee | Colonial Country Club Community Development District |
| 79. | Lee | Gateway Services Community Development District |

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| 80. | Lee | Habitat Community Development District |
| 81. | Lee | Heritage Palms Community Development District |
| 82. | Lee | Laguna Lakes Community Development District |
| 83. | Lee | Mediterra North Community Development District |
| 84. | Lee | Miromar Lake Community Development District |
| 85. | Lee | Parklands West Community Development District |
| 86. | Lee | Renaissance Community Development District |
| 87. | Lee | River Ridge Community Development District |
| 88. | Lee | Stoneybrook Community Development District |
| 89. | Lee | University Square Community Development District |
| 90. | Lee | Vasari Community Development District |
| 91. | Lee | Verandah West Community Development District |
| 92. | Leon | Capital Region Community Development District |
| 93. | Leon | Fallschase Community Development District |
| 94. | Leon | Piney-Z Community Development District |
| 95. | Manatee | Greyhawk Landing Community Development District |
| 96. | Manatee | Heritage Harbour Market Place Community Development District |
| 97. | Manatee | Heritage Harbour South Community Development District |
| 98. | Manatee | Lakewood Ranch Community Development District 1 |
| 99. | Manatee | Lakewood Ranch Community Development District 2 |
| 100. | Manatee | Lakewood Ranch Community Development District 3 |
| 101. | Manatee | Lakewood Ranch Community Development District 4 |
| 102. | Manatee | Lakewood Ranch Community Development District 5 |
| 103. | Manatee | Palms of Terra Ceia Bay Community Development District |
| 104. | Manatee | Tara Community Development District |
| 105. | Manatee | University Place Community Development District |
| 106. | Manatee | Waterlife Community Development District |
| 107. | Marion | Bay Laurel Center Community Development District |
| 108. | Marion | Candler Hills East Community Development District |
| 109. | Marion | Circle Square Woods Community Development District |
| 110. | Marion | Indigo East Community Development District |
| 111. | Marion | Village Community Development District #4 |
| 112. | Miami-Dade | Beacon Lakes Community Development District |
| 113. | Miami-Dade | Beacon Tradeport Community Development District |
| 114. | Miami-Dade | Century Gardens Community Development District |
| 115. | Miami-Dade | Century Parc Community Development District |
| 116. | Miami-Dade | Islands at Doral (SW) Community Development District |
| 117. | Miami-Dade | Kendall Breeze Community Development District |
| 118. | Miami-Dade | Pentathlon Community Development District |
| 119. | Miami-Dade | Sausalito Bay Community Development District |
| 120. | Miami-Dade | South Dade Venture Community Development District |
| 121. | Miami-Dade | Spicewood Community Development District |
| 122. | Miami-Dade | Stonegate Community Development District |
| 123. | Miami-Dade | Trails at Monterey Community Development District |

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| 124 | Miami-Dade | Venetian Isles Community Development District |
| 125 | Multi | Port Labelle Community Development District |
| 126 | Orange | Boggy Creek Improvement District |
| 127 | Orange | Bonnet Creek Resort Community Development District |
| 128 | Orange | East Park Community Development District |
| 129 | Orange | Falcon Trace Community Development District |
| 130 | Orange | Greenway Improvement District |
| 131 | Orange | Mud Lake Improvement District |
| 132 | Orange | Myrtle Creek Improvement District |
| 133 | Orange | Narcoossee Community Development District |
| 134 | Orange | Stoneybrook West Community Development District |
| 135 | Orange | Urban Orlando Community Development District |
| 136 | Orange | Vista Lakes Community Development District |
| 137 | Osceola | Brighton Lakes Community Development District |
| 138 | Osceola | Celebration Community Development District |
| 139 | Osceola | ChampionsGate Community Development District |
| 140 | Osceola | Enterprise Community Development District |
| 141 | Osceola | Harmony Community Development District |
| 142 | Osceola | Osceola Trace Community Development District |
| 143 | Osceola | Overoaks Community Development District |
| 144 | Osceola | Remington Community Development District |
| 145 | Osceola | Reunion East Community Development District |
| 146 | Osceola | Reunion West Community Development District |
| 147 | Osceola | VillaSol Community Development District |
| 148 | Osceola | Xentury City Community Development District |
| 149 | Palm Beach | Beeline Community Development District |
| 150 | Palm Beach | Bella Terra Community Development District |
| 151 | Palm Beach | Briger Community Development District |
| 152 | Palm Beach | CityPlace Community Development District |
| 153 | Palm Beach | Cypress Grove Community Development District |
| 154 | Palm Beach | Hamal Community Development District |
| 155 | Palm Beach | Hypoluxo/Haverhill Community Development District |
| 156 | Palm Beach | Journey's End Community Development District |
| 157 | Palm Beach | Old Palm Community Development District |
| 158 | Palm Beach | Quantum Community Development District |
| 159 | Palm Beach | Winston Trails Community Development District (East) |
| 160 | Palm Beach | Wyndam Park Community Development District |
| 161 | Pasco | Groves Community Development District |
| 162 | Pasco | Heritage Pines Community Development District |
| 163 | Pasco | Heritage Springs Community Development District |
| 164 | Pasco | Lake Bernadette Community Development District |
| 165 | Pasco | Lexington Oaks Community Development District |
| 166 | Pasco | Longleaf Community Development District |
| 167 | Pasco | Meadow Pointe Community Development District |
| 168 | Pasco | Meadow Pointe II Community Development District |

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| 169 | Pasco | Meadow Pointe III Community Development District |
| 170 | Pasco | Meadow Pointe IV Community Development District |
| 171 | Pasco | Meadow Woods Community Development District |
| 172 | Pasco | Northwood Community Development District |
| 173 | Pasco | Oakstead Community Development District |
| 174 | Pasco | Preserve at Wilderness Lake Community Development District |
| 175 | Pasco | Seven Oaks Community Development District |
| 176 | Pasco | Seven Oaks Community Development District II |
| 177 | Pinellas | Eastlake Oaks Community Development District |
| 178 | Pinellas | Gateway Centre Development District |
| 179 | Polk | Bridgewater Community Development District |
| 180 | Polk | City Center Community Development District |
| 181 | Polk | Golden Lakes Community Development District |
| 182 | Polk | Lake Ashton Community Development District |
| 183 | Polk | Poinciana Community Development District |
| 184 | Polk | Westridge Community Development District |
| 185 | Sarasota | Bobcat Trail Community Development District |
| 186 | Sarasota | Lakeside Plantation Community Development District |
| 187 | Sarasota | Venetian Community Development District |
| 188 | Seminole | Dovera Community Development District |
| 189 | St. Johns | Brandy Creek Community Development District |
| 190 | St. Johns | Julington Creek Plantation Community Development District |
| 191 | St. Johns | Marshall Creek Community Development District |
| 192 | St. Johns | Northridge Lakes Community Development District |
| 193 | St. Johns | Sampson Creek Community Development District |
| 194 | St. Johns | St. Johns Forest Community Development District |
| 195 | St. Lucie | Capron Trail Community Development District |
| 196 | St. Lucie | Lake Lucie Community Development District |
| 197 | St. Lucie | Portofino Isles Community Development District |
| 198 | St. Lucie | Portofino Shores Community Development District |
| 199 | St. Lucie | Reserve Community Development District |
| 200 | St. Lucie | Reserve Community Development District #2 |
| 201 | St. Lucie | River Place on the St. Lucie Community Development District |
| 202 | St. Lucie | St. Lucie West Services District |
| 203 | St. Lucie | Westchester Community Development District 1 |
| 204 | St. Lucie | Westchester Community Development District 2 |
| 205 | St. Lucie | Westchester Community Development District 3 |
| 206 | St. Lucie | Westchester Community Development District 4 |
| 207 | St. Lucie | Westchester Community Development District 5 |
| 208 | St. Lucie | Westchester Community Development District 6 |
| 209 | Sumter | Village Community Development District # 1 |
| 210 | Sumter | Village Community Development District #2 |
| 211 | Sumter | Village Community Development District #3 |
| 212 | Volusia | Indigo Community Development District |
| 213 | Walton | Magnolia Bluff Community Development District |

