



**OFFICE OF THE  
COMMISSION AUDITOR**

**MEMORANDUM**

**TO:** Honorable Chairman Anthony Rodriguez  
and Members, Board of County Commissioners

**FROM:** Adeyinka Majekodunmi, CPA  
Commission Auditor

A handwritten signature in blue ink, appearing to read "Adeyinka Majekodunmi", with a long horizontal flourish extending to the right.

**DATE** May 29, 2025

**SUBJECT:** Resolution Approving of and Authorizing the County Mayor or County Mayor's Designee to Execute a 99-Year Amended and Restated Ground Lease with Residences at Palm Court, LLC, a Florida Limited Liability Company and an Affiliate of RUDG, LLC in the Approximate Amount of \$90,819,431.00, for the Development of Palm Court and Palm Towers; Authorizing the County Mayor or County Mayor's Designee to Execute a Consulting Agreement by and between the County and RUDG, LLC's Affiliates, Residences at Palm Court Developer, LLC, a Florida Limited Liability Company, and Residences at Palm Court Manager, LLC, a Florida Limited Liability Company ("RUDG Affiliates") in the Amount of \$6,662,813.12; and Authorizing the County Mayor or County Mayor's Designee to Exercise all Provisions Contained in Therein

---

Pursuant to [Resolution No. R-129-22](#), adopted on February 1, 2022, and the new requirements per Implementing Order (I.O.) 8-4, the Office of the Commission Auditor (OCA) is directed to independently and simultaneously review and comment on the proposed leasing and conveyance of County property prior to the submission of an agenda item to the Board of County Commissioners (BCC). The OCA is providing this report as a Supplement to the BCC Agenda File Item No. 251129.

**Commission Auditor's Observations:**

The OCA completed a comprehensive review of the intended recipient of the lease agreement, Residences at Palm Court, LLC. This review extended to the entity's key personnel. The results yielded the following:

- A. Background research performed on Residences at Palm Court, LLC yielded no material findings.

B. Background research performed on Residences at Palm Court, LLC key personnel yielded the following findings:

1. ***Anthony Del Pozzo, Criminal Record***

*State Case Number: 13-2001-CF-025410-001-XX; Date Filed: August 17, 2001; Date Closed: December 5, 2002; Probation Start Date: December 5, 2002; Probation End Date: June 9, 2005. The Miami-Dade Court and Comptroller Criminal Justice Online System provided the information listed below:*

- i. Trespassing/Structure/Deadly Weapon; Felony; Adjudication Withheld / Court Case / Probation*
- ii. Battery / Felony; Felony; Adjudication Withheld / Court Case / Probation*
- iii. Criminal Mischief: Misdemeanor / Adjudication Withheld / Sentenced*
- iv. Burglary / Dwelling; Felony; No Action*
- v. Stalking / Aggravated; Felony; No Action*
- vi. False Imprisonment; Felony; No Action*
- vii. Drug Paraphernalia / Possession; Misdemeanor; No Action*  
*Cocaine / Possession; Felony; No Action*

2. ***Matthew J. Allen, Construction Lien***

- i. A Construction Lien claim for Matthew J. Allen, CFN: 2021 R 75065; Claim Amount: \$16,752.67; Date Filed: January 29, 2021; no release recorded – a Notice of Contest of Lien CFN 2025 R 152734 was filed on February 28, 2025.*
- ii. A Construction Lien claim for Matthew J. Allen, CFN: 2020 R 574032; Claim Amount: \$6,400.00; Date File: October 7, 2020; no release recorded – a Notice of Contest of Lien CFN 2025 R 152733 was filed on February 28, 2025.*

C. Residences at Palm Court, LLC, key personnel, and affiliated entities of the key personnel were not previously conveyed County properties for the Infill Housing Program, as authorized through BCC resolution. In addition, no privately owned properties were developed under the Infill Housing Program.

Scope of Review:

The OCA's review of the subject lease agreement is based on information provided by the Housing and Community Development Department (HCD), which includes the documents listed under the *Source Documents* section below.

As part of OCA's due diligence procedures, OCA identifies all entities and persons having a disclosed or observed interest in the BCC approval of the lease (see Exhibit 1).

Methodology:

The OCA's review of the entity listed included the following procedures:

- A. A review of Board-approved conveyances to external parties for Infill, Affordable, and Workforce Housing as authorized through BCC resolution.
- B. A review of privately owned properties developed under the Miami-Dade County Infill Housing Program.

- C. A review of Miami-Dade County Property Appraiser, Clerk of the Courts, and Commission Legislation records to ascertain any evidence of risk factors, including entities with a history of previously conveyed or leased County-owned property that was later the subject of an involuntary reverter or lease termination by the County.
- D. A review of the Miami-Dade County Debarred Contractors list to ascertain any evidence of risk factors.
- E. Background research into corporate records, business affiliations, and registrations.

Source Documents:

The documents listed below were used during our review:

1. March 31, 2025, Ownership Disclosure Affidavit, *Residences at Palm Court, LLC*
2. June 3, 2025, Mayor's Memorandum, *Residences at Palm Court, LLC*
3. June 3, 2025, Draft Amended and Restated Ground Lease, *Residences at Palm Court, LLC*

**Exhibit 1: Residences at Palm Court, LLC**

	Individual/Entity Name	Relation to Residences at Palm Court, LLC
1	Residences at Palm Court Manager, LLC	Manager
2	JMPFT Affordable, LLC	Principal
3	ADP Ventures, LLC	Principal
4	PRH Affordable Investments, LLC	Principal
5	PRH Investments, LLC	Principal
6	PHR Related Holdings, LLC	Principal
7	Perez Ross Holdings, LLC	Principal
8	RUDG, LLC	Principal
9	The Urban Development Group, LLC	Principal
10	Milo Family Real Estate Investments, LLC	Principal
11	JMP Holdings GP, LLC	Principal
12	Jorge M. Perez Holdings, LTD	Principal
13	Jon Paul Perez	President
14	Anthony Del Pozzo, III	Vice President, Treasurer, Secretary
15	Matthew Allen	Vice President
16	Ben Gerber	Vice President
17	Alberto Milo, Jr.	Vice President
18	Maria C. Milo	Member / Manager of Affiliated Entity
19	Jorge M. Perez	Member / Manager of Affiliated Entity

This report will be included in the corresponding BCC meeting agenda. If you have any questions or need additional information, please call me at (305) 375-4354.

cc: Honorable Mayor Daniella Levine Cava  
Geri Bonzon-Keenan, County Attorney  
Gerald K. Sanchez, First Assistant County Attorney  
Jess McCarty, Executive Assistant County Attorney  
Carladenise Edwards, Chief Administrative Officer  
Jimmy Morales, Chief Operations Officer  
Cathy Burgos, Chief Community Services Officer  
Felix Jimenez, Inspector General, Office of the Inspector General  
Ofelia Tamayo, Director, Internal Compliance  
Basia Pruna, Director, Clerk of the Board and Procurement, Clerk of the Courts  
Nathan Kogon, Interim Director, Housing and Community Development Department  
Eugene Love, Agenda Coordinator  
OCA Staff