



OFFICE OF THE COMMISSION AUDITOR

MEMORANDUM

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

FROM: Adeyinka Majekodunmi, CPA
Commission Auditor

DATE May 30, 2025

A handwritten signature in blue ink, appearing to read "Majekodunmi", is written over the "FROM:" line.

SUBJECT: Resolution Approving and Authorizing the County Mayor or County Mayor's Designee to: (1) Execute, in Accordance with Section 125.35, Florida Statutes, a 99-Year Master Ground Lease and Related Subleases (Lease), Which Such Lease Includes a Lump Sum Capitalized Ground Lease Payment of \$2,250,000.00, with Integral Florida, LLC (Integral) Related to the Development of West Grove Development (Development), (2) Execute a Master Development Agreement (MDA) with Integral in the Total Estimated Amount of \$434,163,799.00, Inclusive of a Payment of 31 Percent of the Developer Fees Estimated at \$3,255,067.00, an Asset Management Fee of \$20,000.00 Annually after the First Full Year of Stabilization, Estimated at \$3,860,000.00, a One-Time Stabilization Fee of \$180,000.00 for Both Phases, Monthly Davis Bacon Monitoring Fees in the Amount of \$3,000.00, Estimated at \$144,000.00, and an Annual Share of 25 Percent of All Net Distributable Operating Receipts; (3) Exercise All Provisions Contained in the Lease and MDA and (4) Subject to the United States Department of Housing and Urban Development's Approval, Execute All Necessary Rental Assistance Demonstration and/or Mixed-Finance Agreements and All Other Documents Related to the Development; and Waiving Section 2-10.4.2 of the Code of Miami-Dade County, Florida Related to Appraisals

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. 250875.

Commission Auditor's Observations:

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

A. Background research performed on 'Integral Florida, LLC' yielded the following:

I. The Integral Group, LLC, an affiliated entity of Integral Florida, LLC, State Tax Lien State Tax Lien Filing Number: 2309120584 Certificate Number: 23249303933 CA Franchise Tax Board, State of California: Date Filed: September 12, 2023, Amount: \$34,532.00; no release recorded. OCA contacted the California Franchise Tax Board (FTB) Disclosure Office on May 23, 2025, and a response from the CA Franchise Tax Board was received on May 30, 2025, stating the FTB could not confirm if the lien has been satisfied.

B. Background research on 'Integral Florida, LLC' key personnel yielded no material findings.

Scope of Review:

The OCA's review of the subject lease agreement is based on information provided by the Housing and Community Development (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. April 2, 2025, Ownership Disclosure Affidavit, *Integral Florida LLC*

2. April 2, 2025, Draft *Master Ground Lease Agreement between Miami-Dade County and Integral Florida, LLC of real property located on a portion of the West Grove development*

Exhibit 1: Integral Florida, LLC

	Individual/Entity Name	Relation to Integral Florida, LLC
1	Integral Development, LLC	Principal
2	KTB Bravis, LLC	Principal
3	The Integral Group, LLC	Principal
4	The Integral Partners, LLC	Principal
5	Ferus Group II, LLC	Principal
6	SydCour, LLC	Principal
7	Egbert L.J. Perry	Manager
8	Kareem T. Brantley	Member / Manager of Affiliated Entity
9	Minca Davis Brantley	Member of Affiliated Entity
10	Valerie Edwards	Member / Manager of Affiliated Entity
11	Vicki Lundy Wilbon	Member / Manager of Affiliated Entity
12	Carl L. Powell	Member 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
Eugene Love, Agenda Coordinator
OCA Staff