



OFFICE OF THE  
**COMMISSION AUDITOR**

MEMORANDUM

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

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

**DATE** March 16, 2026

**SUBJECT:** Resolution Approving and Authorizing the County Mayor or County Mayor's Designee To Execute (1) in Accordance with Section 125.35, Florida Statutes, a 99-Year Ground Lease with Perrine Apartments, Ltd., an Affiliate of Atlantic Pacific Communities, LLC (APC) for an Approximate Total Amount of \$17,011,920.01, Inclusive of a Lump Sum Ground Lease Payment of \$1,010,000.00, for the Rental Assistance Demonstration Conversion and Redevelopment of the Third Phase of Perrine Gardens and Perrine Village, (2) a Cash Flow and Capital Proceeds Sharing Agreement with APC Perrine Apartments GP, LLC, an Affiliate of Perrine Apartments, Ltd., and APC, in an Approximate Total Amount of \$14,060,338.51 through the Term of the Lease, (3) a Developer Fee Sharing Agreement with Perrine Development, LLC, an Affiliate of Perrine Apartments, Ltd., and APC, in an Approximate Total Amount of \$1,901,581.50 from 30 Percent of the Developer Fee, and (3) Authorizing the County Mayor or County Mayor's Designee To Exercise All Provisions Contained in Such Agreements; and Waiving Section 2-10.4.2 of the Code of Miami-Dade County, Florida

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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. 260424.

**Commission Auditor's Observations:**

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

- A. Background research performed on Perrine Apartments, Ltd yielded no material findings.
- B. Background research on Perrine Apartments, Ltd key personnel yielded the following findings:
  - i. *Randy K. Weisburd, Liens and Judgments*
    - *Construction Lien: CFN: 20220410591; Dated: May 20, 2022, amount \$10,433.93; no record of release on file.*
    - *Civil Judgment: Associated Intl Recovery, Denver County Court; Date: September 14, 1994, amount \$126.00; no record of release on file.*
  - ii. *Stanley D. Cohen, Liens and Judgments*
    - *Small claim judgment, San Diego Court; Dated: March 7, 2003, \$1000; no record of release on file.*
- C. Perrine Apartments, Ltd, 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 lease agreement is based on information provided by the Housing and Community Development Department (HCD), including the documents listed in 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 agreement (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. Draft, Mayor's Memorandum, *Recommendation to Execute a 99-year Ground Lease and Related Agreements between Miami-Dade County and Perrine Apartments, Ltd., an Affiliate of Atlantic Pacific Communities, LLC, for the Rental Assistance Demonstration Conversion and Redevelopment of the Third Phase of Perrine Gardens and Perrine Village.*
2. December 29, 2025, Ownership Disclosure Affidavit, *Perrine Apartments, Ltd*
3. Draft, *Ground Lease (Perrine Village I) between Miami-Dade County and Perrine Apartments, Ltd*

**Exhibit 1: Perrine Apartments, Ltd**

	<b>Individual/Entity Name</b>	<b>Relation to Perrine Apartments, Ltd</b>
1	Perrine Apartments GP, LLC	General Partner of Perrine Apartments, Ltd
2	APCHD MM II, Inc.	Manager of Perrine Apartments GP, LLC and Perrine Holdings, LLC
3	Howard D. Cohen Revocable Trust	Principal
4	DI Perrine Village, LLC	Principal
5	Wells Fargo	Investor Limited Partner
6	Atlantic Pacific Communities, LLC	Developer
7	Appreciation Holdings, LLC	Affiliate of Atlantic Pacific Communities, LLC
8	Appreciation Holdings-Manager, LLC	Manager of Atlantic Pacific Communities, LLC and Appreciation Holdings, LLC
9	Perrine Development, LLC	Developer
10	APC Perrine Development, LLC	Manager of Perrine Development, LLC
11	Perrine Holdings, LLC	Assignee of Atlantic Pacific Communities, LLC
12	Howard D. Cohen	Chief Executive Officer of APCHD MM II, Inc. and Chairperson and CEO of Atlantic Pacific Communities, LLC
13	Leighton K. Brown	Manager, DI Perrine Village, LLC
14	Randy Weisburd	President of APCHD MM II, Inc. and Atlantic Pacific Communities, LLC
15	Kenneth Cohen	Vice President/Treasurer/Secretary of APCHD MM II, Inc. and Vice President of Atlantic Pacific Communities, LLC
16	Stanley Cohen	Manager of APC Perrine Development, LLC and Vice President of APCHD MM II, Inc.
17	Kenneth Naylor	Vice President of APCHD MM II, Inc.

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  
Jess McCarty, First Assistant County Attorney  
Carladenise Edwards, Chief Administrative Officer  
Jimmy Morales, Chief Operations 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, Director, Housing and Community Development  
Alejandro Martinez-Esteve, Director, Office of Real Estate and Development  
Eugene Love, Agenda Coordinator  
OCA Staff