

**From:** [Carlene Smith](#)  
**To:** [Katrina Cool](#)  
**Cc:** [Virginia Haller](#)  
**Subject:** FW: 1015-1025 Simonton proposed development  
**Date:** Tuesday, June 18, 2013 11:28:36 AM

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**From:** Martin Alexander [mailto:[scout750@yahoo.com](mailto:scout750@yahoo.com)]  
**Sent:** Tuesday, June 18, 2013 10:40 AM  
**To:** [vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)  
**Cc:** [cesmith@keywestcity.com](mailto:cesmith@keywestcity.com)  
**Subject:** 1015-1025 Simonton proposed development

Ms. Haller:

Please circulate ( or have someone circulate) this email to each of the Planning Board members prior to the 6/20/2013 meeting.

I am writing as a concerned former resident of Southernmost Cabana Resort at 1015 Simonton. Concerned for the current low income residents. My interest in the proposed development arises from my (and my wife's) time as residents for six months each year 2009-2012, residing in our personal recreational vehicle. Half of that time period I worked as an independent contractor handyman maintaining the park's campers. In that role I met most of the residents and saw the inside of most of the campers. There is no doubt most of the campers are old and in generally poor condition, but they do provide affordable housing for upwards of 100 people. The residents range in age from infants to the very elderly.

I would like to clear up some misconceptions, intentional or otherwise.

1. Although there is an occasional law-breaking resident (allowed in due to inadequate prescreening), the vast majority of residents are hard workers in the service industries who live at SMCR to be close to work places and due to the dearth of other affordable housing.
2. SMCR is not, and has never been, a mobile home park. It is a trailer/camper/RV park. Even its prior name, Key west Trailer Court, clearly indicates this fact. Actually, in the not so distant past, visitors were allowed to park their campers for as short a period as overnight as it was considered a campground. As other commentators have noted, all of the campers owned by SMCR are required to have current license plates and registrations, as are private owners such as myself. Mobile homes are not required to have vehicle type license plates.
3. The current owner/developer of SMCR, Joe Cleghorn, has stated in a newspaper interview that displaced residents will receive housing for free for three months in other property he owns. On the surface that offer seems laudable, but the facts indicate the impracticality of the offer. Mr. Cleghorn, to my knowledge, does not own suitable property in Key West to house the displaced. He does own a trailer park several miles away named Lazy Lakes. However, I doubt Lazy Lakes could absorb 100 people, or even half that number. And of course, many of the SMCR residents bicycle/walk to work and do not even own cars. Therefore they would lose their jobs if moved to Lazy Lakes and thus could not pay rent after the 3 free months (not to mention the rent at Lazy Lakes is much higher than SMCR).
4. Apparently the transformation of SMCR is now being considered a "redevelopment" rather than a "development". I would find this an amusing semantic exercise if the issue was not so serious for so many people. It seems clear to me that once the campers are demolished, trees cut, and water and sewer lines ripped out, what is left is an acre of ground. This ground, like any virgin piece of earth slated to be built upon, would have new utility lines installed, be graded, and then be built upon as an entirely new development. To call

what is being proposed a "redevelopment" is to stretch the meaning of the word beyond all rationality. What, exactly, is being redeveloped besides an acre of earth? Certainly no building or shell of a building. It seems quite clear "redevelopment" has now taken on the same meaning as "development" but is being used solely as a means to avoid the requirement of providing 30% affordable housing on site at 1015 Simonton. To me it appears to be a blatant attempt to circumvent Key West code 122-1467. Would not one be concerned about later legal challenges?

I have no vested interest in the outcome of SMCR development as I no longer live there. I knew when Mr. Cleghorn purchased it he would eventually attempt to develop it. That is what developers and developers/planners believe in and strive for. What I do feel strongly about is to be open and honest about motivations and results. The undeniable facts are these: 44 affordable campers housing upwards of 100 people will be demolished to provide for the construction of 21 market rate townhouses which quite possibly may be primarily vacation homes.

The developer (redeveloper?) will make money. The construction crews will make money. The city will make money through increased taxes. The only losers will be 100 people who are evicted through no fault of their own and have no affordable place to go. These people have no power, no money, little legal recourse and have been use to being dealt a bad hand. Therefore, they do not matter in the big picture. The city constantly talks about providing affordable housing but the reality is right in front of you- the intentional elimination of 44 affordable units with no firm replacement. That is what your approval will mean for real people.

Take a minute and go to Google Earth. You will see 1015 Simonton is about the last patch of greenery amid a sea of asphalt an rooftops.

Sincerely, Martin and Beverly Alexander

# Windward Park Homeowners Association

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June 17, 2013

VIA: e-mail – amannix@aol.com

Annalise Mannix Engineering and Consulting LLC  
3739 Paula Ave.  
Key West, FL 33040

Re: Redevelopment Project at 1015 – 1027 Simonton Street

Dear Ms. Mannix,

Thank you for your time on Thursday, June 13<sup>th</sup> to explain in detail some of the key points regarding the above development. After our conversation, the Windward Park Homeowners Association made the decision to document our concerns and send them to you for review before the meeting on June 20, 2013.

We want to see the new development proceed in order to improve the surrounding properties; however we would like our concerns addressed before moving forward with this project. The Windward Park Home Owners Association is in disagreement with the Proposal and has concerns listed below:

1. **Layout:** The current layout (north elevation) where the 18 parking spaces and the 1 floor units are located will have the following effect on our properties backing onto each other.
  - The building height towering over the units 5,6,7,8,9 and 10 of Windward Park will take all privacy away from our homeowners decks and patios.
  - The building height towering over the units 5,6,7,8,9 and 10 will take way all the natural sunlight that we have on our properties at the current time.
  - We feel these units could be relocated to the east or west.
  - The location of the parking garage will constantly create noise from doors slamming, starting of cars, motorcycles, head lamps shining through the north fence plus serious exhaust fumes flowing into our back yards given the prevailing winds. Considerations for noise, lights, exhaust should be considered as the Windward Park homes are approximately 10 feet away. The placement of the parking garage as shown on the plans is unacceptable to our homeowners. Vehicles so close to our decks and patios using Deisel fuel will create exhaust fumes that will pose a risk to human health for people living in Windward Park. **We oppose the parking garage location.** Other options should be considered.
2. **Fence:** The north 8 foot fence owned by Windward Park that separates the properties has existing trees growing through the fence. When the trees are removed a considerable amount of repairs to the existing fence will need to be done. This is a cost and a security issue that will need to be addressed before the trees are removed and we would request that we have the procedure in writing before going forward. The fact the development is providing a separate 6 foot fence placed

# Windward Park Homeowners Association

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against the existing fence has no value and eliminates maintenance opportunities due to the two fences aligning. We would suggest an alternative and that is a new 8 foot fence to be installed. The design should be approved by our committee, Harc and the developer so that one fence would separate the property and provide a sound barrier, security and eliminate shining lights.

3. **Neighboring Developments and Past History:** A similar development, Echo Gardens was erected 8 years ago installing backfills that damaged our existing fence. They also built homes that towered 35 feet high eliminating sunlight and reducing privacy. The developer took no responsibility and we want to ensure this does not happen again. Given the current proposal the same will happen to Windward Park again, therefore our reason of objecting.
4. **Construction Type and Schedule:** Understanding that the current type of construction has not been determined gives further concern to the length of the construction schedule. Our homeowners will be deeply affected by the schedule due to the length and noise disruptions. Our concerns are as follows:
  - Year round owners will be disrupted daily for an undetermined amount of time by noise. Our owners are employed people who are working different shifts and will be severally affected as some of their houses are 10 ft. from the developing site.
  - Five home owners outside decks are facing the fence of the development. This will be a severe imposition to anyone being outside at Windward Park.
  - Three of the properties that run along the fence are Transient Rentals and there will be a loss of income to those homeowners due to the noise level and inconvenience of construction. The Rental companies will not put their guests in our rental homes and take the chance if irate customers.
5. **Demolition and Construction Procedures:** The procedures for demolition and construction are satisfactory to us given the procedures are followed and a Site Superintendent is our contact for daily concerns. We understand from an earlier e-mail the working hours commence at 8:00 a.m. and that a noise/work variance will be required to change that. No times have been stated for stop work at the end of the day nor how many days a week work will go on. It has been stated there may be times evening and night work would be required. Will our Homeowners Association be notified of the variance each time evening and night work commences? We would request more information on this item.
6. **Waste Procedures:** Confirmation of the Waste Procedure is requested. We want to ensure there are no garbage bins installed anywhere near the Windward Park Property and no Waste Bins are installed after the project is completed.

# Windward Park Homeowners Association

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7. **Storm Water Management:** Is there a current storm water management plan in place along with the site plan agreement. We would like to be advised of that.
  
8. **Air Conditioning Units:** The placement of air conditioning units are a concern as we understand this has not been finalized. We would like to see this addressed as placement on the roof will create noise to the upstairs of our houses. If they are ground units and placed along the fence line they will affect the noise on all 5 homes along the fence line. We would request more information on this item.
  
9. **Tree Removal:** Upon demolition of the existing trailer park we understand that a large amount of tree removal will take place. Our concern for the safety of homeowners existing decks, furniture and people be need to be considered. Many of the trees overhang Windward Park and several large ones are growing within our fence. We would like it addressed as to who is responsible for clean up, permitting of the Windward Park trees and an overall procedure as to how they will co-ordinate the tree removal without disrupting all of Windward Park.

In conclusion, I would suggest any of our concerns that are listed above be included into the existing site plan agreement to ensure all parties are satisfied and occupancy permits are issued.

We would also request a schedule of construction from start to finish that **identifies the progress and be provided with any updated schedules so we can communicate to our HOA.**

We thank you for your time and hope to have everything addressed so that your project may move forward.

Sincerely,

*Barry Giberson*

Windward Park Homeowners Association  
Committee for Development of Neighboring Properties

Barry Giberson – [bjgiberson@aol.com](mailto:bjgiberson@aol.com)  
Neil McMichael – [boneislanders@gmail.com](mailto:boneislanders@gmail.com)  
Ed Kovach – [edkovach@msn.com](mailto:edkovach@msn.com)

- c.c. - Ken Neighoff – [kneighoff@comcast.net](mailto:kneighoff@comcast.net)
- c.c. - Debbie Gray – [graze@cogeco.ca](mailto:graze@cogeco.ca)
- c.c. - City of Key West Planning Dept. Ginny Haller– [vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)
  
- cc. - Karen DeMaria, City of Key West Tree Commission – [kdemaria@keywestcity.com](mailto:kdemaria@keywestcity.com)

# Windward Park Homeowners Association

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**From:** [Virginia Haller](#)  
**To:** [Katrina Cool](#)  
**Subject:** Fwd: 1015 - 1025 Simonton Proposed Development Project  
**Date:** Thursday, May 23, 2013 4:39:11 PM

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for the record  
Ginny

----- Forwarded message -----

From: **Virginia Haller** <[vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)>  
Date: Thu, May 23, 2013 at 4:37 PM  
Subject: Fwd: 1015 - 1025 Simonton Proposed Development Project  
To: Annalise <[amannix@aol.com](mailto:amannix@aol.com)>

----- Forwarded message -----

From: **"T" Neighoff** <[tneighoff@comcast.net](mailto:tneighoff@comcast.net)>  
Date: Thu, May 23, 2013 at 3:54 PM  
Subject: 1015 - 1025 Simonton Proposed Development Project  
To: [vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)  
Cc: Diane & Barry Giberson <[dmhgiberson@aol.com](mailto:dmhgiberson@aol.com)>, Barry Giberson <[bjgiberson@aol.com](mailto:bjgiberson@aol.com)>, Debbie Gray <[graze@cogeco.ca](mailto:graze@cogeco.ca)>, Ed kovach <[edkovach@msn.com](mailto:edkovach@msn.com)>, Neil McMichael <[boneislanders@gmail.com](mailto:boneislanders@gmail.com)>, Tom Sireci <[tsirecipa@bellsouth.net](mailto:tsirecipa@bellsouth.net)>, [richard@rmkpa.com](mailto:richard@rmkpa.com), John Oliver <[jroliverus@yahoo.com](mailto:jroliverus@yahoo.com)>, Bobbie Sweeney <[wigglda@comcast.net](mailto:wigglda@comcast.net)>

Dear Ms. Haller,

My husband and I are owners at Windward Park and have received copies of the information you provided to Diane and Barry Giberson. Thank you for sharing this with them and thus other owners at Windward Park. We have been opposed to the project since receiving the first letter from the city and now that we have reviewed the project plans, are further opposed. We would be most grateful if you would take our and the Giberson's concerns into consideration at this evening's meeting.

The plans say that a six foot wood fence will be put in place during the construction phase, but does not specify the style or height of fence or wall that will replace it following construction and what degree of privacy that structure will afford. Maintenance of the final fence or wall is not addressed either.

The site plan places many of the units along the north border has eight units: one single 2 story structure, the four-plex 1 story unit over the garage parking area and a tri-plex. The north border adjoins Windward Park. Each of the five homes that share the fence along that border of Windward Park have rear / side decks that will no longer have the privacy. All the other borders of the proposed development are either bordered by streets, Simonton or Virginia or the Archdiocese property.

Further compounding this diminished privacy and potentially diminished property values to the Windward Park properties is the fact that the developer is proposing placing 18 spaces underneath the four-plex directly backing up to our homes. Windward Park owners will then have to listen to and be sitting directly on the other side of a fence from

a large parking lot. It would seem that some consideration be given to the location of the parking and that the plan be reconfigured to move exhaust emissions away from an existing residential community.

Access to the eighteen parking spaces is from Simonton Street. That area of Simonton also serves two entrances to Duval Square, the entrance to Echo Gardens and two commercial offices. In addition to this congestion, many tractor trailer sized delivery trucks service the businesses in the CVS shopping plaza at the corner of Simonton and Truman. Accessing 18 spaces from Simonton would seem to create even more congestion at an already dangerous block.

We are also concerned with the loss of affordable housing. As neighbors of the trailer park since 1997, we can attest that the tenants are hard working people. We sincerely doubt that any of them will be able to afford to purchase any of these units, even the six held as affordable housing. Where will the current tenants be displaced to?

While 21 units is a lower number than 44 trailers we question the degree to which the impact upon the city's storm water and water will be lessened. We do not see in the material we've reviewed so far how many bathrooms, showers, tubs, dishwashers and washing machines are being proposed for the 21 units. We imagine the sum of these would have greater impact on our resources than 44 mobile homes and trailers.

We are also concerned that these will be primarily purchased as investment properties, not single family homes and would like to know if transient licenses will be issued. It is our impression that they are no longer available and are confused by the HNC-1 Zoning allowing for Hotels, Motels and transient lodging.

We are in agreement with the concerns that Barry Giberson addressed on May 21 and would have responded that day as well, but were traveling. Thank you for your time. We hope that the city will take into consideration our many concerns, work with the developer towards an improved layout for the project if it continues to move forward and keep us informed.

Ken and Tee (mary) Neighoff

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Ginny Haller  
Planner  
City of Key West  
Phone [305-809-3725](tel:305-809-3725)  
Email [vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)

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Ginny Haller  
Planner  
City of Key West  
Phone 305-809-3725  
Email [vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)



**From:** [Glenn Stevenson](mailto:Glenn.Stevenson)  
**To:** [kcool@keywestcity.com](mailto:kcool@keywestcity.com)  
**Subject:** Fwd: 1015 1027 Simonton.  
**Date:** Wednesday, May 22, 2013 4:02:59 PM  
**Importance:** High

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Karina,

Please see my comments below.

Thank you  
Begin forwarded message:

**From:** Glenn Stevenson <[gstevenson@keywesttaxi.com](mailto:gstevenson@keywesttaxi.com)>  
**Date:** 21 May 2013 20:27:54 EDT  
**To:** [amannix@yahoo.com](mailto:amannix@yahoo.com)  
**Subject:** 1015 1027 Simonton.

Annalise,

It is with regret that I will not be able to attend this week's meeting in regards to this project. I do think this is more in keeping of the area and less impact. However my first concern is the three areas marked as future optional driveway on the original side of Virginia street. I really do not see the need for this option and would like that adjusted if possible as I can see this becoming . My other concern is where will each household empty their trash as I do not wish to see a row of green trash cans opposite my house and where will Waste Management pick up from? I ask this as I have an issue with trash cans on Simonton at the Eco Gardens as it is an eye sore.

Thank you and good luck with the project.

Glenn Stevenson  
616 Virginia Street

Glenn Stevenson

**WINDWARD PARK HOMEOWNERS ASSOCIATION  
606 TRUMAN AVENUE #14  
KEY WEST, FL 33040**

May 19<sup>th</sup>, 2013

Annalise Mannix Engineering & Consulting LLC  
3739 Paula Ave.  
Key West, FL  
33040

Sent via e-mail to: amannix@aol.com

Re: Redevelopment Project at 1015 – 1027 Simonton Street

Dear Ms. Mannix

The Homeowners Association of Windward Park located at 606 Truman Ave., Key West has been forwarded your letter of May 6/13 with the enclosure of the site plan of the above referenced project. This letter is to give you notice of our concerns on the proposed project before the meeting of the Key West Planning Board on May 23<sup>rd</sup>/13.

The following items have been discussed and we would like to have them addressed in the early stages of this project:

**Existing Fence:**

1. We understand from the site plan your development has intentions of joining together the development property to the existing fence owned by Windward Park. Could you confirm that for us? Our fence is not a "Party Fence".
2. If the development plans to join into the fence owned by Windward Park HOA, we must be advised in writing of the procedures for damage through construction, damage and repairs upon tree removal as some of the existing trees are grown into the fence, access to the developed property for our maintenance needs and the developments responsibility of ongoing maintenance from their side of the property.
3. Due to security issues no damaged boards may be left unattended that will leave access to our property and this is a great concern to us.

**General Construction Concerns:**

1. **Dust Control.** Can you advise us of the procedure that will be used to ensure our Associations 13 houses are not overcome by Construction Dust and our Community Pool is not filled daily with Dust from the project? Our Community Pool is directly in front of the houses backing on to the development property and we are concerned that the blowing dust and dirt will shut down our pool filters.
2. **Lighting.** We object to any street lighting or exterior lighting pointed directly at the back of our four houses that back up to your property.
3. **Second Floor Decks.** We would like to know if the units will have second floor decks overlooking the Windward Park fence and Homeowners property therefore affecting our privacy.

**WINDWARD PARK HOMEOWNERS ASSOCIATION  
606 TRUMAN AVENUE #14  
KEY WEST, FL 33040**

4. **Trees.** We would like to know the plan for tree removal in the vicinity of our existing fence and know who will be responsible for the cleanup of falling debris onto the Homeowners decks and houses, Windward Parks common area and easements directly inside our fence line. We would also like to know the plan of cutting trees that overhang from Windward Park onto the development property.
5. **General Construction.** We would like to be advised of the General Construction rules and regulations as they will apply to this project.
  - a. Hours of work
  - b. Who will be our contact with the contractor

If you would like to do a walkthrough of our property at 606 Truman to help you understand our questions we would be happy to arrange that for you. We have a caretaker on site that could possibly see you Monday the 20<sup>th</sup> or Tuesday the 21<sup>st</sup> of May. Our board members are not in Key West this week to attend a meeting but would be happy to correspond by e-mail or phone.

Sincerely,

Windward Park Homeowner's Association

*Edward C Kovach*

Edward Kovach  
President  
[edkovach@msn.com](mailto:edkovach@msn.com)  
Phone: 612-751-0379

Subj: **Fwd: Southernmost Cabana Resort LLC re/ Virginia/Simonton**  
Date: 19/05/2013 9:16:32 A.M. Eastern Daylight Time  
From: [bjgiberson@aol.com](mailto:bjgiberson@aol.com)  
To: [dmhgiberson@aol.com](mailto:dmhgiberson@aol.com)

Barry Giberson

----- Original Message -----

From: Barry Giberson <[bjgiberson@aol.com](mailto:bjgiberson@aol.com)>  
To: dmhgiberson <[dmhgiberson@aol.com](mailto:dmhgiberson@aol.com)>  
Sent: Mon, May 6, 2013 9:29 pm  
Subject: Fwd: Southernmost Cabana Resort LLC re/ Virginia/Simonton

Barry Giberson

----- Original Message -----

From: Barry Giberson <[bjgiberson@aol.com](mailto:bjgiberson@aol.com)>  
To: vhaller <[vhaller@keywestcity.com](mailto:vhaller@keywestcity.com)>  
Sent: Mon, May 6, 2013 5:29 pm  
Subject: Southernmost Cabana Resort LLC re/ Virginia/Simonton

Virginia,

Thank you for taking time today to explain the process regarding planning and development for the existing proposed new housing. I have no objection to the 180 day extension as described in your letter for the May 7 th meeting.

On another note we have a concern for the following and would like to be advised and informed of the process.

1. The existing wooden fence that runs east and west and separates Windward Park development will be the barrier for the new property. Will the new developer be taking part in any maintenance needs for the fence, any repairs during and after construction and given the fact we have already consumed the cost to construct and maintain for 25 years. The new development would certainly benefit from the existing fence and I would suggest the Windward Park facility and Home owners association be compensated and or brought into the discussions as to how this is being developed. Will the new development be installing a new fence ?
2. Out of concern I would also like to know what height restrictions are in place for the new homes.
3. What is the proposed time line of construction once started and where will the construction start, east, west, north or south. There are a number of homes that have transit rental licenses and long term rentals not to mention people who own and work every day. The noise level for a period of time may be very disruption if the project drags on and on.

Please understand my position of concerns and I am all for supporting a new development within the existing park.

Regards,  
Barry Giberson

**From:** [Carlene Smith](#)  
**To:** [Mike Rison](#)  
**Cc:** [Katrina Cool](#); [Don Craig](#)  
**Subject:** FW: #4 Major Development Plan 1015 -1025 Simonton (RE #00027070 000000, AK # 1027847  
**Date:** Friday, June 07, 2013 4:14:24 PM  
**Attachments:** [FL Dept of HW Safety Trailers Tags Registration.pdf](#)  
[Trailer Park Trailer #1 125NYU Registration.pdf](#)  
[Trailer Park Layout with Plate Numbers.pdf](#)  
[IMGA2716.JPG](#)

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Good afternoon Mr. Rison. Thank you for your email. Katrina will upload your email as public comment as well as forward it to all Planning Board members.

Thank you and have a nice weekend.

-Carlene Smith

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**From:** Mike Rison [mailto:[dfcmike@iserv.net](mailto:dfcmike@iserv.net)]  
**Sent:** Friday, June 07, 2013 4:08 PM  
**To:** Carlene Smith  
**Subject:** Re: #4 Major Development Plan 1015 -1025 Simonton (RE #00027070 000000, AK # 1027847

Carlene: My name is Mike Rison and I live at 1015 Simonton, SMCR Trailer Park.

Could you please circulate this e-mail and the attachments contained herein to each of The Planning Board Members.

Planning Board Members:

Hello; My name is Mike Rison and I live in the Trailer Park at 1015 Simonton SMCR. I came from Michigan in 2006 and moved into the Trailer Park in 2007. In 2007 the Trailer Park was owned by St. Mary's Church (Diocese of Miami) and was sold to SMCR in 2009. I have owned two different trailers in the Trailer Park one on Lot #6 and the one I own now on Lot #4, a 35' 2002 Prowler Travel Trailer.

Life is good for me in the Trailer Park; I love the area being so close to and within biking or walking distance of everything (CVS, Denny's, Papa John's, Subway, The Atlantic Ocean, Truman Medical Center, St Mary's Church, etc. etc.). I knew the intent of the new owner SMCR was to develop this Trailer Park and considering the new Codes in force now regarding Affordable Housing I was all for the Development and I still am according to the Key West Codes in 122-1467.

There where 3 or 4 Public Notices posted about Development. I went to the City WEB Site and down-loaded each new plan. The 26 unit plan with the

model already in the chamber was pulled just before the meeting started. Next a Public Notice was given for the 21 unit plan, which after examination became a Single Family Re-development instead of a Development. So I did lots of research, talked to numerous people to determine what this all meant. Now with my research in hand (some of which e-mailed to Ginny before hand) I set up a meeting with the Planning Department last Friday (5/17). I met with Don Craig, Ginny Haller and the HARC person at the Habana Plaza offices.

Don started the meeting by asking what my concerns were and I responded that I was concerned about the eviction of 100 people from the Trailer Park and the Affordable Housing Option found in KW Code 122-1467. Don handled my first concern of the eviction of tenants by citing “The Florida Mobile Home Relocation Trust Fund” of The Florida Mobile Home Relocation Corporation, Saying that was an issue between the tenants or SMCR and FLMHRC. I then pressed Don on the Affordable Housing and he responded that rules were different for Development vs. Re-development and Affordable Housing rules didn’t apply to Re-development. I have to admit I was waiting for that statement and proceeded to lay out my findings that SMCR’s attempt to convert 44 Mobile Holmes into 21 units of Modular Housing was fatally flawed. I then showed him a picture of trailer #1 with a State of Florida License Plate attached and clearly visible (current FL Plate #125NYU), a copy of the Vehicle Registration (W/Plate #, Vehicle # & Body Style TV) and finally a print out from The Florida Department of Highway Safety and Motor Vehicles,  
Re: Certificate Of Title Requirements for Recreational Vehicles, Mobile Homes And Office Trailers FS 319. This last document spells out what the codes on the Registration are TV=Travel Trailer, HS=Mobile Home. I then linked this all together for the Planning Department. Where SMCR under so called Re-Development Rules is proposing to convert 44 Mobiles Homes into 21 Modular Homes, except SMCR has Zero Mobile Homes and instead according to the State of Florida DMV has 40 or so Transient Travel Trailers, which cannot be converted to anything! Confronted with this information Don casually mentioned that SMCR was willing to donate 6-8 Affordable Housing Units to The City of Key West for use at a later date in a different location. I did initially think well now maybe were making some progress.

On the following Monday somebody mentioned that a final draft of the MDP was on the City WEB Site. And there it was for the first time amongst all the pages of text they had submitted in writing by either the City or SMCR a

reference to the 30% (6 units) the issue of Affordable Housing. Unfortunately no mention is made pertaining to the location or time frame for the Affordable Housing units at 1015 Simonton which is explicitly required by KW Code 122-1467 and further shown on no submitted drawings. Remember Don said at our meeting that the 6-8 Affordable Units donated would be used at a different location at a yet to be determined time, not what the Code says.

I have stated previously that I am for this development according to KW Code 122-1467. Key West attracts big investment money from all over the world which in turn drives up housing prices driving me and most others into the “30%” category. I was not in the “30%” category where I came from in Michigan but I am in the “30%” category in Key West and 122-1467 is all of our protection from that malady.

Regards,

Mike Rison  
(305) 433-1010  
[dfcmike@iserv.net](mailto:dfcmike@iserv.net)

**Florida**  
**Department of Highway Safety**  
**and Motor Vehicles**  
*Division of Motorist Services*

<b>PROCEDURE</b>  TL-13	<b>SUBJECT:</b> CERTIFICATE OF TITLE REQUIREMENTS FOR RECREATIONAL VEHICLES, MOBILE HOMES AND OFFICE TRAILERS		
<b>DESCRIPTION AND USE:</b> THIS PROCEDURE PROVIDES INFORMATION AND INSTRUCTIONS TO ASSIST TAX COLLECTOR EMPLOYEES, LICENSE PLATE AGENCY EMPLOYEES, AND THE DEPARTMENT OF HIGHWAY SAFETY AND MOTOR VEHICLES IN CARRYING OUT REQUIREMENTS TO ISSUE CERTIFICATE OF TITLE FOR RECREATIONAL VEHICLES, MOBILE HOMES, AND OFFICE TRAILERS.			
<p>I. <b>PROVISIONS OF LAW:</b></p> <p>Section 319.21(2), Florida Statutes, states, "When a motor vehicle is built in two or more stages, each manufacturer must provide a manufacturer's statement of origin for each stage."</p> <p>Section 320.8231(1), Florida Statutes, states "Each recreational vehicle-type unit, as defined in s. 320.01(1)(b), manufactured in this state or manufactured outside this state but sold or offered for sale in this state shall meet the Uniform Standards Code ANSI book A-119.2 or A-119.5, as applicable, approved by the American National Standards Institute. Such standards shall include, but are not limited to, standards for the installation of plumbing, heating, and electrical systems and fire and life safety in recreational vehicle-type units and park trailers. However, those park trailers exceeding 400 square feet shall meet the Federal Manufactured Home Construction and Safety Standards and shall have a United States Department of Housing and Urban Development label (HUD)."</p> <p>Section 320.01(1) (b), Florida Statutes, define recreational vehicles as units primarily designed as temporary living quarters for recreational, camping or travel use having either its own motive power or mounted on or drawn by another vehicle. The basic entities are:</p> <p>Travel Trailer: A vehicular portable unit, mounted on wheels, of such a size or weight as not to require special highway movement permits when drawn by a motorized vehicle. It is primarily designed and constructed to provide temporary living quarters for recreational, camping, or travel use. It has a body width of no more than 8 1/2 feet and an overall body length of no more than 40 feet when factory-equipped for the road.</p> <p>Fifth-Wheel Trailer: A vehicular unit mounted on wheels, designed to provide temporary living quarters for recreational, camping or travel use, of such a size or weight as not to require a special highway movement permit. The gross trailer area shall not exceed 400 square feet in the setup mode, and it is designed to be towed by a motorized vehicle that contains a towing mechanism that is mounted above or forward of the tow vehicle's rear axle.</p>			
<p><b>Revision(s) to this Procedure:</b> <i>Corrected wording to show that if there is a fifth-wheel connector on the conversion the vehicle can not be registered as an RV on page 7 and deleted duplicate wording on page 8.</i></p>			
<b>DIVISION DIRECTOR</b>	<b>EFFECTIVE DATE</b>  7/01/01	<b>REVISION DATE</b>  04/26/07	<b>PAGE #</b>  TL-13-01



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**Camping Trailer:** A vehicular portable unit mounted on wheels and constructed with collapsible partial side walls which fold for towing by another vehicle and unfold at the camp site to provide temporary living quarters for recreational, camping or travel use.

**Truck Camper:** A truck equipped with a portable unit designed to be loaded onto, or affixed to, the bed or chassis of the truck and constructed to provide temporary living quarters for recreational, camping, or travel use.

**Motor Home:** A vehicular unit which does not exceed the length, height and width limitations provided in s. 316.515, is a self-propelled motor vehicle, and is primarily designed to provide temporary living quarters for recreational, camping, or travel use.

**Private Motor Coach:** A vehicular unit which does not exceed the length, width, and height limitations provided in s. 316.515(9), Florida Statutes, is built on a self-propelled bus type chassis having no fewer than three load-bearing axles, and is primarily designed to provide temporary living quarters for recreational, camping, or travel use.

**Van Conversion:** A vehicular unit which does not exceed the length and width limitations provided in s.316.515, is built on a self-propelled motor vehicle chassis, and is designed for recreation, camping and travel use.

**Park Trailer:** A transportable unit which has a body width not exceeding 14 feet and which is built on a single chassis and is designed to provide seasonal or temporary living quarters when connected to utilities necessary for operation of installed fixtures and appliances. The total area of the unit in a setup mode, when measured from the exterior surface of the exterior stud walls at the level of maximum dimensions, not including any bay window, does not exceed 400 square feet when constructed to American National Standard Institute (ANSI A-119.5 standards) and 500 square feet when constructed to United States Department of Housing and Urban Development Standards. The length of park trailer means the distance from the exterior of the front of the body (nearest to the drawbar and coupling mechanism) to the exterior of the rear of the body (at the opposite end of the body), including any protrusions.

**Mobile Home:** Section 320.01(2), Florida Statutes, provides a definition for "mobile home." A mobile home is defined as a structure, transportable in one or more sections, which is 8 body feet or more in width and which is built on an integral chassis and designed to be used as a dwelling when connected to the required utilities and includes the plumbing, heating, air-conditioning, and electrical systems contained therein. For tax purposes, the length of mobile home is the distance from the exterior of the wall nearest to the drawbar and coupling mechanism to the exterior of the wall at the opposite end of the home where such walls enclose living or other interior space. Such distance includes expandable rooms, but excludes bay windows, porches, drawbars, couplings, hitches, wall and roof extensions, or other attachments that do not enclose interior space. In the event that the mobile home owner has no proof of the length of the drawbar, coupling, or hitch, then the tax collector may in his discretion either inspect the home to determine the actual length or may assume four feet to be the length of the drawbar, coupling, or hitch.

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**Office Trailer:** An office trailer is a mobile building, used to conduct normal office duties, duly approved as meeting applicable codes, may or may not be affixed permanently to a foundation and may be removed after completion of a task for which it was installed. The weight of an office trailer may be determined by multiplying length X width X 20 pounds.

**II. DOCUMENTATION REQUIRED AND SPECIAL INSTRUCTIONS:**

A. When a vehicle has been titled in Florida, follow DMS Procedure TL-11 for transfer of certificate of title.

When the vehicle has been titled outside of Florida, follow DMS Procedure TL-10 for Original Certificate of Title Applications.

B. A certificate of title is not allowed for slide-in campers, modular homes, add-a-rooms, port-a-rooms and trailers under 2,000 pounds. However, trailers weighing 2,000 pounds or more must be titled.

C. In order to charge the proper tax rate for registration, all certificate of title applications for recreational vehicles must show one of the following types:

1. "TV" for rigid-walled travel trailers, equal to or less than 40 feet, and must also show length (including the hitch).
2. "CA" for folding-walled trailers and must show length (including the hitch).
3. "MH" for all self-propelled recreational vehicles and must show weight.
4. "PC" for all private motor coaches and must show weight.
5. "VC" for all van-type recreational vehicles and must show weight.
6. "HS" for all mobile homes and must also show length (excluding the hitch).
7. "OT" for all office trailers and must show weight (the weight may be determined by multiplying length X width X 20 pounds).
8. "PT" for all park trailers and must show length (including the hitch).

D. The following list shows how travel trailers, mobile homes and other vehicles may be described on the Manufacturer's Certificate of Origin (MCO) and the Division of Motorist Services (DMS) Body Type Abbreviation:

<u>Type Unit Code</u>	<u>Body Type</u>	<u>DMS Body Type Abbreviation</u>
D.M.H.	Duplex Mobile Home	HS
Mini H.	Mini Motor Home	MH
Mo. H.	Motor Home	MH
P.T.	Park Trailer	PT
PVT. Co.	Private Motor Coach	PC
R.V. Van	Rec. Veh. Van	VC
TR.C.	Slide-In-Trailer Camper (not subject to FL title)	CA
T.C.	Tent Camper	CA
T.T.	Travel Trailer	TV
F.W.	5th Wheel Travel Trailer	TV

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<p>E. Manufacturer's Certificate of Origin for Motor Homes and Van Conversions:</p> <ol style="list-style-type: none"> <li>1. The department will require a second stage MCO on units that have been converted from a van type vehicle to a recreational type vehicle. In order for a converted unit to qualify as a recreational vehicle, it must have at least one of the following installed by a licensed recreational vehicle manufacturer:             <ol style="list-style-type: none"> <li>A. 110 volt electrical wiring</li> <li>B. LP gas piping</li> <li>C. Plumbing system (consisting of permanently attached water-using toilet facility)</li> </ol> </li>   <li>2. The second stage MCO will bear the name and vin number assigned by the converting manufacturer which must accompany the first stage MCO. The converting manufacturer must be licensed and bonded by this department as a recreational vehicle manufacturer.</li>   <li>3. The vin number shown on the second MCO, issued by the converting manufacturer, must be identical to the vin number shown on the first stage MCO which was initiated by the manufacturer of the vehicle, e.g., Ford, Dodge, and which is permanently affixed to the vehicle.</li>   <li>4. Motor homes and van conversions are to be titled in the following manner:             <ol style="list-style-type: none"> <li>a. All 1981 and later model year motor homes and all model year van conversions:   <div style="padding-left: 40px;">Form HSMV 82040, Application for Certificate of Title with/without Registration, or HSMV 82041, Application for Vehicle/Vessel Certificate of Title and/or Registration, should show the make and year of the vehicle on the second stage MCO and the vin number as shown on the first stage MCO.</div> </li>   <li><b>NOTE:</b> Always show the year on the second stage MCO, even if NMVTIS brings back a different year for the vehicle. However, there should never be more than a two model year difference.</li>   <li>b. 1980 and prior model year motor homes:  <div style="padding-left: 40px;">Form HSMV 82040, Application for Certificate of Title with/without Registration, or form HSMV 82041, Application for Vehicle/Vessel Certificate of Title and/or Registration, should show the make, year and vin number on the second stage MCO. The vin number shown on the first stage MCO is not to be used.</div> </li>   <li>c. A motor home and van conversion previously titled in another state will be titled in Florida using the same description of the vehicle as shown on the out-of-state certificate of title.</li> </ol> </li> </ol> <p><b>NOTE:</b> If a "title only" is being applied for on a recreational vehicle and will be tagged at a later date, an affidavit is required. The affidavit must state that the recreational vehicle is in dead storage and will remain in dead storage until it is properly registered.</p>	
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F. Conversion Affidavit:

In the case of an individual converting their own vehicle and requesting to have the identity changed on the title in order to have it registered and licensed as a recreational vehicle, the customer must submit an affidavit to the tax collector. The affidavit must certify that the unit has been converted to the extent to include one of the aforementioned items to qualify it as a recreational vehicle.

**EXAMPLE:**

This is to certify that I, \_\_\_\_\_, owner of a (Year) \_\_\_\_\_,  
(Make) \_\_\_\_\_, (VIN) \_\_\_\_\_, hereby request the vehicle be classified  
as recreational vehicle for the following reason:

- Installed 110 volt electrical wiring
- Installed LP gas piping
- Installed plumbing system

III. MISCELLANEOUS INFORMATION:

A. **Questions and Answers Involving Mobile Homes and Recreational Vehicle Brokers**

1. Are licensed mobile home brokers required to appear in the chain of title of mobile homes they sell?

**NO.** Because mobile home brokers by definition do not take possession or title to mobile homes, there is no requirement that they appear in the chain of title.

2. What type of records must a mobile home broker keep?

Because brokers are a type of dealer, they are required to keep the same kinds of records required of mobile home dealers by section 320.77(8), Florida Statutes.

3. Are brokers required to apply for title on behalf of a retail customer under section 319.23(6)?

**YES.** Section 319.23(6) requires that the dealer apply for title in the case of sale "by a licensed dealer". Because this provision is intended to protect the public welfare, it should be liberally construed to effect its intended end. Therefore, even though the broker is not the owner of the mobile home, transactions conducted through brokers should be considered sales by licensed dealers for the purpose of this subsection.

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<p><b>B. Question and Answer Involving Classification of Trailer Combining Living Space with Storage Space:</b></p> <p>Should a trailer which combines living space with storage/transport space, such as a horse trailer with living accommodations for humans, be classified as a "travel trailer" under section 320.01(1)(b)1; Florida Statutes?</p> <p><b>YES.</b> A trailer which combines living space with storage/transport space, such as a horse trailer with living accommodations for humans, should be classified as a "travel trailer" under section 320.01(1)(b)1, Florida Statutes.</p> <p>It is clear that the trailers in question meet this definition and should be classified as travel trailer. Even though they are designed for dual use, they are primarily designed and constructed to provide living quarters for recreation, camping or travel use. This phrase is intended to distinguish these trailers on the one hand from mobile homes, which are designed to be used as "dwelling units," 320.01(2)(a), and on the other hand, from storage trailers and office trailers which could conceivably be used to sleep in, but which are not primarily designed as living quarters.</p> <p>Therefore these trailers must be registered using class codes 60, 61, 77 or 78 to ensure assessment of the appropriate registration tax and fees.</p> <p><b>C. Questions and Answers Concerning Changing a Heavy Truck or Truck Tractor to a Recreational Vehicle:</b></p> <p>1. Can a heavy truck be converted/changed to be titled and registered as a recreational vehicle?</p> <p><b>YES.</b> A heavy truck can be changed from its current classification to a recreational vehicle, if it continues to meet the definition listed in s. 320.01 (10), Florida Statutes, AND is only used for the purpose of carrying the personal effects of the passengers.</p> <p>If the vehicle meets the definition of 320.01(10), Florida Statutes, and its purpose is to carry goods other than the personal effects of the passengers, it must be titled and registered as a heavy truck.</p> <p>Conversions are typically built on a commercial truck chassis. For title and registration purposes in Florida, these truck conversions may be designed or equipped with a connecting device for the purpose of drawing a trailer.</p> <p>A trailer as defined in section 320.01(4), Florida Statutes, is "any vehicle without motive power designed to be coupled to or drawn by a motor vehicle and constructed so that no part of its weight or that of its load rests upon the towing vehicle."</p> <p>Notice that the definition is specific in that "no part of its weight or that of its load rests upon the towing vehicle."</p>	
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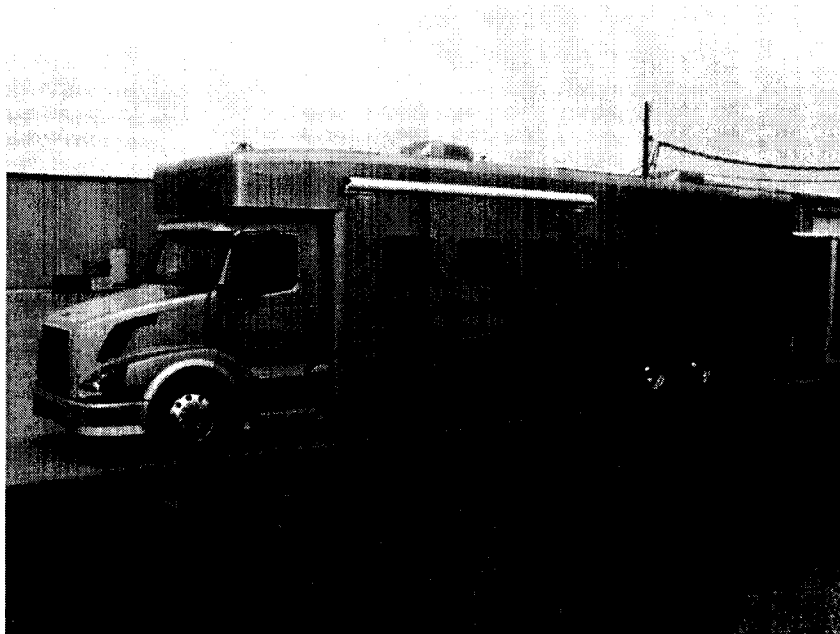
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In other words, these heavy truck conversions may have a connecting device on the back of the vehicle to tow a vehicle, boat trailer, etc., however, they may not have a fifth-wheel connecting device.

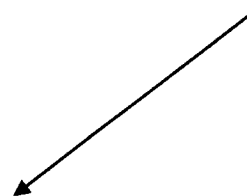
The make will be the make of the heavy truck. The VIN will be the VIN on the chassis. The year will be the year of the chassis. The vehicle type will be AU and the body type will be MH.

If you receive an application for truck conversion, the first question you ask should be, "Is there a fifth-wheel connecting device on this conversion?" If the answer is yes, the vehicle cannot **be** titled and/or registered as **an** RV.

Below is a picture that illustrates what a truck conversion looks like:



Notice the connecting device is not a fifth-wheel.



If the vehicle meets the definition of 320.01(10), Florida Statutes, and its purpose is to carry goods other than the personal effects of the passengers, it must be titled and registered as a heavy truck.

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2. Can a truck tractor be converted/changed to be titled and registered as a recreational vehicle?

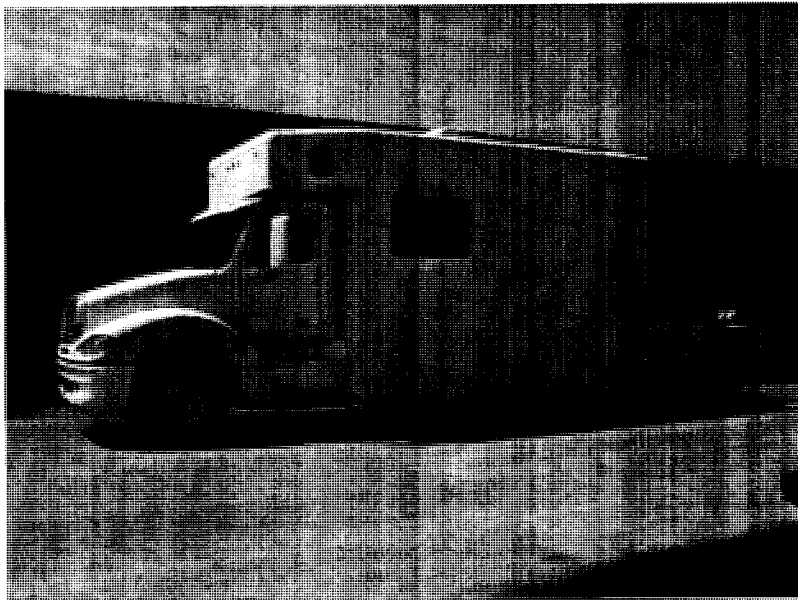
NO. Truck-tractors as defined in 320.01(11), Florida Statutes, may not be converted to a recreational vehicle.

Truck-tractors are designed with a fifth-wheel for the primary purpose of drawing a semitrailer.

Section 320.01 (5), Florida Statutes defines a semitrailer as any vehicle without motive power designed to be coupled to or drawn by a motor vehicle and constructed so that some part of its weight and that of its load rests upon or is carried by another vehicle.

Notice that the **definition is** specific in that “part of its weight and that of its load rests upon or is carried by another vehicle.”

Below is a picture of a truck conversion that does not qualify as an RV.



Notice the fifth-wheel connection. This vehicle must be titled and registered as a truck-tractor.

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<p style="text-align: center;"><b>D. Auctions are allowed to deal in Recreational Vehicles:</b></p> <p style="text-align: center;">Section 320, Florida Statutes, clarifies the process for a dealer to dispose of recreational vehicles taken in trade through licensed motor vehicle auctions.</p> <ol style="list-style-type: none"><li>1. Section 320.27, F.S., allows a licensed motor vehicle dealer to sell at retail or wholesale, recreational vehicles they have acquired as trade-ins during the regular course of business. However, a motor vehicle dealer may not buy a recreational vehicle for the purpose of resale unless they are licensed as a recreational vehicle dealer pursuant to s. 320.771, Florida Statutes.</li><li>2. Section 320.27(1)(c)4, F.S., defines a "motor vehicle auction" as any person offering motor vehicles or recreational vehicles for sale to the highest bidder where buyers are licensed motor vehicle dealers. Such person shall not sell a vehicle to anyone other than a licensed motor vehicle dealer.</li><li>3. Section 320.77, F.S., allows mobile home and recreational vehicle dealers to buy recreational vehicles being sold at auctions.</li></ol> <p>E. A documentation check list is attached to this procedure as Exhibit A.</p> <p>F. Graphic Illustrations are attached to this procedure as Exhibit B.</p> <p>G. See Forms Appendix for a sample of the HSMV forms referred to in this procedure.</p>	
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**EXHIBIT A**

**RECREATIONAL VEHICLES, MOBILE HOMES  
AND OFFICE TRAILERS CHECK LIST**

**FORMS**

**FLORIDA RECORD/NEW VEHICLE**

**OUT-OF-STATE RECORD**

\_\_\_\_\_ HMSV 82040 or HSMV 82041

\_\_\_\_\_ HSMV 82040 OR HSMV 82041

\_\_\_\_\_ Florida Title

\_\_\_\_\_ HSMV 82042, or the VIN  
Verification section on form  
HSMV 82040.

OR,

\_\_\_\_\_ First and second stage  
Manufacturer's Certificate of  
Origin

\_\_\_\_\_ Out-of-state proof of ownership

\_\_\_\_\_ Lien satisfaction(s), if applicable.

\_\_\_\_\_ Florida sales tax or specify sales tax exemption information on form HMV 82040 or form HSMV  
82041.

\_\_\_\_\_ Florida license plate number, non-use affidavit or the mobile home or RP decal.

\_\_\_\_\_ Title fees

**NOTE: For an individual completing a van conversion the following must be also be submitted:**

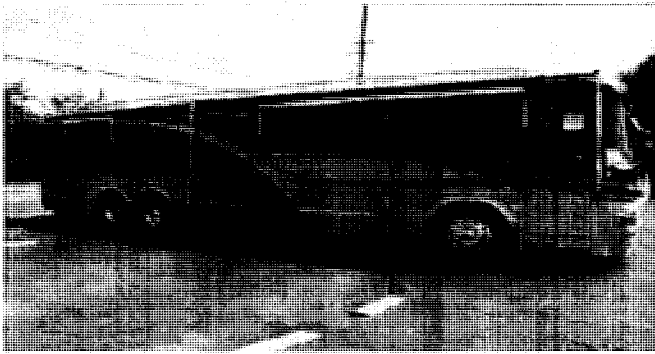
\_\_\_\_\_ Conversion affidavit certifying that the unit has been converted to the extent to include  
one of the items below to qualify it as a recreational vehicle.

\_\_\_\_\_ Installed 110 volt electrical wiring

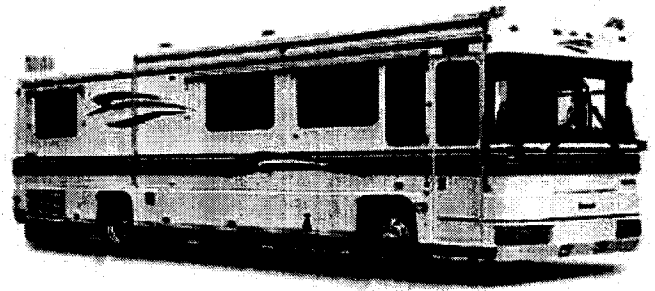
\_\_\_\_\_ Installed LP gas piping

\_\_\_\_\_ Installed plumbing system

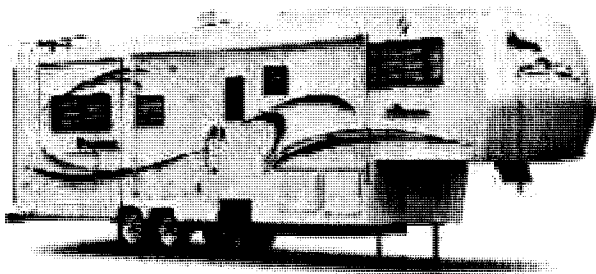
**EXHIBIT B**



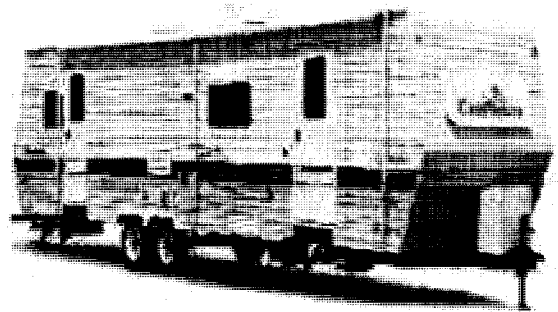
**PRIVATE MOTOR COACH**



**MOTOR HOME**



**FIFTH WHEEL**



**TRAVEL TRAILER**



**MOBILE HOME**



**PARK TRAILER**

K04 96Y 11/13 FL FOUND

VIRGINIA STREET

SIMONTON

IN →

910 NYT  
 FL 29 6/13  
 974 NPT 4/13  
 FL 28  
 968 NPT 4/13  
 27 FL  
 969 NPT 4/13  
 26 FL  
 972 NPT 4/13  
 FL 25  
 L68444  
 24 FL  
 L67344 6/13  
 FL 23

OFFICE  
 FL 6/13  
 36 L69344  
 DOCTKC L66744  
 30 FL  
 31  
 32  
 35 FL  
 978 NPT 4/13  
 FL 34  
 964 NPT 4/13  
 FL 33

966 NPT L69444 4/13  
 FL 44  
 L69644 6/13  
 43 FL  
 912 NYT 4/13  
 FL 40  
 979 NPT 4/13  
 423 MEC 4/13  
 FL 39  
 L69544 6/13  
 41 FL  
 907 NYT 4/13  
 FL 45

← OUT

KEEP VACANT  
 22  
 21  
 714 PER  
 SHOP  
 FL 20 6/13  
 126 NY 6/13  
 FL 19  
 971 NY 4/13  
 FL 18  
 973 NPT 4/13  
 FL 17 6/13  
 963 NY 6/13

125 NY 6/13  
 FL 6/13  
 122 NY 6/13  
 FL 2  
 967 NPT  
 FL 3  
 886 GP 170  
 ME  
 L65044 6/13  
 FL 1  
 5XC 226  
 CA 40  
 88FNGH  
 7  
 L66544 6/13  
 FL 0  
 965 NPT 6/13  
 FL 9

913 NYT  
 FL 0 6/13  
 133 NED 6/13  
 FL 1  
 L66644  
 FL 11 1/2  
 MRVAN  
 12 PARK  
 12 1/2  
 908 NYT  
 FL 14 6/13  
 15  
 16

TITLE NUMBER	22872977	VEHICLE ID NUMBER	LS146377	>>
YEAR	1977	BODY	TV	MAKE
MAKE				IN-HOUSE LAST
TITLE ISSUE DATE	04/26/2011	TITLE STATUS	TRANSFER	
TITLE/NMVTIS	[ ]/[ ]	DESC		
PENDING		STATUS DATE	04/26/2011	
TITLE CANCEL DATE		ELEC. TITLE	PAPER TITLE	
CANCEL REASON		STATUS		
C OF R ISSUE DATE		EFS STATUS	(NONE)	
C OF D ISSUE DATE		LEGAL OWNERSHIP		
AUTHORIZED		TOW TYPE		
DESTRUCTION DATE		TOW DATE		
SALES TAX REG		TRANSFER OF	[ T ]	
SALES TAX EXEMPT		EQUITY		
		MAILED TO	[ ] ...	
		NMVTIS PRE	/	
		STATE/NUM		
PREV/CURR STATE	FL /FL			

—JNT OWNER NUM —CUSTOMER NAME  
 1 SOUTHERNMOST CABANA RESORT LLC NONE ...

—LIENS —  
 LIEN DETAILS

PLATES/VESSELS		VEHICLE	BRAND
CORRESPONDENCE	[ F ]	DETAILS	DETAILS
COMMENT DESC.			
COMMENT DESC.			
UNSTRUCT. NAME			

PLATE NUMBER 125NYU	STATUSISSUED	INV CODE TRUE LP 125NYU	RGR
DECAL TYPE	DECAL NUMBER	YEAR	FLEET NUM
REGULAR	17685402	2013	
VEH ID NUMBER	LS146377	>>	YEAR MAKE 1977
FL/DO/OOS NUMBER			LEGISLATIV [ ] E
TITLE QUERY ...	VEHICLE QUERY ...		MAILED TO [ ] ... RECURRING [ ] PLATE QUERY ...
CUSTOMER NAME	SOUTHERNMOST CABANA RESORT LLC ...		
UNSTRUCT. NAME			
VEH CLASS	77	REG USE	GE
REG STATUS	ACTIVE	UNIT NBR	
BIENNIAL FLAG	[ ]	RENTAL PARK	[ ]
EFF/EXP DATE	02/11/2013/06/30/2013		
REG NUMBER	245361040	HOV DECAL	HOV EXP DATE
INITIAL FEE			
STATUS			