

# CIVILLE & TANG, PLLC

www.civilletang.com

Sender's Direct E-Mail:  
jtang@civilletang.com

March 14, 2025

## VIA E-MAIL

*efnapoli@ghura.org*

Ms. Elizabeth F. Napoli  
Executive Director  
**GUAM HOUSING AND URBAN RENEWAL AUTHORITY**  
117 Bien Venida Avenue  
Sinajana, Guam 96910

***Re: Sunshine Act Request Regarding LIHTEC 2024 Application and Award***

Dear Ms. Napoli:

I am requesting on behalf of Summer Vista II DE LLC and Summer Vista III DE LLC, the following documents and information, pursuant to the Sunshine Reform Act of 1999 set forth in 5 G.C.A. §10101 *et seq.*:

1. All communications and documents by and between Pacific Federal Management, Inc. (“PFM”) or Flores Rosa Gardens L.L.C. (Flores Rosa, LLC) representatives, employees, consultants and agents, on the one hand, and the Guam Housing and Urban Renewal Authority (“GHURA”) on the other hand, relating to the execution of the 2025 GHURA Low Income Housing Tax Credit Carryover Allocation Agreement entered into by GHURA and Flores Rosa, LLC on February 3, 2025.

The term “communications” used herein shall include WhatsApp messages, e-mails, text messages, and any other social media or messaging channels.

2. Any GHURA Low Income Housing Tax Credit Carryover Allocation Agreement entered into by GHURA and Flores Rosa, LLC. dated and/or signed in the calendar year 2024.

3. Any and all communications, memos, and documents submitted GHURA to the United States Internal Revenue Service (“IRS”) to report GHURA’s annual Low-Income Housing Tax Credit allocations and carryovers to the IRS, including but not limited to IRS Form 8610 and Schedule A to IRS Form 8610, for the years 2020, 2021, 2022, 2023, and 2024.

Ms. Elizabeth F. Napoli

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4. Any and all communications, memos, and documents made and/or relied upon by the GHURA Board of Commissioners at the GHURA Board meeting held on February 6, 2025, including the documents Chairman John Rivera and Commissioner Victor Torres read from in making a motion to “award no other projects and hold back the balance from the 2024 cycle to be allotted during the coming 2025 application cycles for a total of \$8,206,880.00.”

5. Any and all communications, memos, and documents prepared for you or by you, that was relied upon by you and/or Deputy Director Fernando Esteves in making recommendations to the GHURA Board at the February 6, 2025 Board meeting regarding the 2024 LIHTC QAP Application Cyle.

Please indicate in your response if you do not have any documents responsive to the requests. If you deny any of these requests, please cite each specific exemption justifying the refusal to release the information.

We look forward to your prompt and expeditious response. Thank you.

Sincerely,



**Joyce C.H. Tang**