

**Portofino Isles Community
Development District**

ANNUAL FINANCIAL REPORT

September 30, 2018

Portofino Isles Community Development District

ANNUAL FINANCIAL REPORT

September 30, 2018

TABLE OF CONTENTS

	<u>Page Number</u>
REPORT OF INDEPENDENT AUDITORS	1-3
MANAGEMENT’S DISCUSSION AND ANALYSIS	4-9
BASIC FINANCIAL STATEMENTS	
Government-wide Financial Statements	
Statement of Net Position	10
Statement of Activities	11
Fund Financial Statements	
Balance Sheet – Governmental Funds	12
Reconciliation of Total Governmental Fund Balances to Net Position of Governmental Activities	13
Statement of Revenues, Expenditures and Changes in Fund Balances – Governmental Funds	14
Reconciliation of the Statement of Revenues, Expenditures and Changes in Fund Balances of Governmental Funds to the Statement of Activities	15
Statement of Revenues, Expenditures and Changes in Fund Balances – Budget and Actual – General Fund	16
Notes to Financial Statements	17-29
INDEPENDENT AUDITOR’S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH <i>GOVERNMENT AUDITING STANDARDS</i>	30-31
MANAGEMENT LETTER	32-34
INDEPENDENT ACCOUNTANT’S REPORT / COMPLIANCE WITH SECTION 218.415, FLORIDA STATUTES	35



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REPORT OF INDEPENDENT AUDITORS

To the Board of Supervisors
Portofino Isles Community Development District
City of Port St. Lucie, Florida

Report on the Financial Statements

We have audited the accompanying basic financial statements of Portofino Isles Community Development District as of and for the year ended September 30, 2018, as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Fort Pierce / Stuart

- 1 -

To the Board of Supervisors
Portofino Isles Community Development District

Basis for Adverse Opinion on the Discretely Presented Component Units

The financial statements do not include financial data for one of the District's legally separate component units. Accounting principles generally accepted in the United States of America require the financial data for the component unit to be reported with the financial data of the District's primary government unless the District also issues financial statements for the financial reporting entity that include the financial data for its component unit. The District has not issued such reporting entity financial statements. Because of this departure from accounting principles generally accepted in the United States of America, the assets, liabilities, net position, revenues, and expenses of the aggregate discretely presented component units should have been presented.

Adverse Opinion

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on the Discretely Presented Component Units", the financial statements referred to above do not present fairly, the financial position of the discretely presented component units of the District as of September 30, 2018, or the changes in financial position thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Qualified Opinion

In our opinion, except for the effects of the matter described in the "Basis for Adverse Opinion on the Discretely Presented Component Units" paragraph, the financial statements referred to above present fairly, in all material respects, the financial position of the aggregate remaining fund information of the District as of September 30, 2018, and the respective changes in financial position thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Unmodified Opinions

In our opinion, the financial statements referred to previously present fairly, in all material respects, the respective financial position of the governmental activities and each major fund of the District, as of September 30, 2018, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

To the Board of Supervisors
Portofino Isles Community Development District

Other Matters

Required Supplementary Information

Governmental accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis and budgetary comparison be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by *Governmental Accounting Standards Board* who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures in accordance with governmental auditing standards generally accepted in the United States of America, which consisted principally of inquires of management regarding the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued a report dated April 24, 2019 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations and contracts.

The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Portofino Isles Community Development District's internal control over financial reporting and compliance.

*Berger Toombs Elam
Gaines + Frank*

Berger, Toombs, Elam, Gaines & Frank
Certified Public Accountants PL
Fort Pierce, Florida

April 24, 2019

Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018

Management's discussion and analysis of Portofino Isles Community Development District (the "District") financial performance provides an objective and easily readable analysis of the District's financial activities. The analysis provides summary financial information for the District and should be read in conjunction with the District's financial statements.

OVERVIEW OF THE FINANCIAL STATEMENTS

The District's basic financial statements comprise three components; 1) *Government-wide financial statements*, 2) *Fund financial statements*, and 3) *Notes to financial statements*. The *Government-wide financial statements* present an overall picture of the District's financial position and results of operations. The *Fund financial statements* present financial information for the District's major funds. The *Notes to financial statements* provide additional information concerning the District's finances.

The *Government-wide financial statements* are the **statement of net position** and the **statement of activities**. These statements use accounting methods similar to those used by private-sector companies. Emphasis is placed on the net position of governmental activities and the change in net position. Governmental activities are primarily supported by special assessments.

The **statement of net position** presents information on all assets and liabilities of the District, with the difference between assets and liabilities reported as net position. Net position are reported in three categories; net investment in capital assets, restricted, and unrestricted. Assets, liabilities, and net position are reported for all Governmental activities.

The **statement of activities** presents information on all revenues and expenses of the District and the change in net position. Expenses are reported by major function and program revenues relating to those functions are reported, providing the net cost of all functions provided by the District. To assist in understanding the District's operations, expenses have been reported as governmental activities. Governmental activities financed by the District include general government, physical environment and debt service.

Fund financial statements present financial information for governmental funds. These statements provide financial information for the major funds of the District. Governmental fund financial statements provide information on the current assets and liabilities of the funds, changes in current financial resources (revenues and expenditures), and current available resources.

**Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Fund financial statements include a **balance sheet** and a **statement of revenues, expenditures and changes in fund balances** for all governmental funds. A **statement of revenues, expenditures, and changes in fund balances – budget and actual** is provided for the District's General Fund. *Fund financial statements* provide more detailed information about the District's activities. Individual funds are established by the District to track revenues that are restricted to certain uses or to comply with legal requirements.

The government-wide financial statement is designed to provide the reader with a broad overview of the District's finances, in a manner similar to a private sector business. In the government-wide statement of net position, the governmental activities column is presented on a consolidated basis and is reported on a full-accrual economic resource basis, which recognizes all non-current assets and receivables as well as all non-current debt and obligations. The effect of interfund activity has been eliminated from the government-wide financial statements. In contrast, the governmental fund financial statements are grouped into funds to account for and to maintain control over resources that have been segregated for specific activities or objectives. The fund financial statements are presented using the current financial resources measurement focus and the modified accrual basis where as revenues are recorded when collected in the current period or within 60 days of year-end and expenditures are recorded when a liability is incurred. The difference between the two statements arises primarily from the long-term economic focus of the Statement of Activities versus the current financial resources focus of the governmental funds. A reconciliation of the government-wide and the fund financial statement is provided to illustrate these differences.

Notes to financial statements provide additional detail concerning the financial activities and financial balances of the District. Additional information about the accounting practices of the District, investments of the District, capital assets and long-term debt are some of the items included in the *notes to financial statements*.

Financial Highlights

The following are the highlights of financial activity for the year ended September 30, 2018.

- ◆ The District's total liabilities exceeded total assets by \$(5,160,751), (net position). Unrestricted net position for Governmental Activities was \$(2,531,376). Net investment in capital assets was \$(2,653,218). Restricted net position was \$23,843.

- ◆ Governmental activities revenues totaled \$891,538 while governmental activities expenses totaled \$1,245,564.

**Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Financial Analysis of the District

The following schedule provides a summary of the assets, liabilities and net position of the District and is presented by category for comparison purposes.

Net Position

	Governmental Activities	
	2018	2017
Current assets	\$ 536,074	\$ 924,790
Restricted assets	864,689	851,225
Capital assets	6,991,586	6,839,917
Deferred amount on refunding	198,153	211,741
Total Assets and Deferred outflows of resources	8,590,502	8,827,673
Current liabilities	4,521,253	4,009,398
Non-current liabilities	9,230,000	9,625,000
Total Liabilities	13,751,253	13,634,398
Net position - net investment in capital assets	(2,653,218)	(3,169,817)
Net position - restricted	23,843	77,313
Net position - unrestricted	(2,531,376)	(1,714,221)
Total Net Position	\$ (5,160,751)	\$ (4,806,725)

The decrease in current assets is mostly the result of the capital project expenditures in the current year for a capital project.

The increase in capital assets is primarily the result of current year additions in excess of depreciation.

The increase in current liabilities and decrease in unrestricted net position is the result of not making scheduled debt service payments on the Series 2005 Bonds in the current year.

**Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Financial Analysis of the District (Continued)

The following schedule provides a summary of the changes in net position of the District and is presented by category for comparison purposes.

Change in Net Position

	Governmental Activities	
	2018	2017
Program Revenues		
Charges for services	\$ 669,205	\$ 777,767
Grants and contributions	17,250	506,458
General Revenues		
Investment earnings	13,011	4,520
Intergovernmental revenues	192,072	185,888
Miscellaneous revenues	-	50,000
Total Revenues	<u>891,538</u>	<u>1,524,633</u>
Expenses		
General government	171,512	174,566
Physical environment	511,514	481,824
Interest on long term debt	562,538	618,885
Total Expenses	<u>1,245,564</u>	<u>1,275,275</u>
Change in Net Position	(354,026)	249,358
Net Position - Beginning of Year	<u>(4,806,725)</u>	<u>(5,056,083)</u>
Net Position - End of Year	<u>\$ (5,160,751)</u>	<u>\$ (4,806,725)</u>

The decrease in grants and contributions is mostly attributable to contributions received from a homeowner's association to partially fund a capital project in the prior year.

The decrease in miscellaneous revenues is related to the refund of an escrow deposit in the prior year.

The decrease in interest expense is related to the reduction in unmatured debt outstanding.

**Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Capital Assets Activity

The following schedule provides a summary of the District's capital assets as of 2018 and 2017.

<u>Description</u>	<u>Governmental Activities</u>	
	<u>2018</u>	<u>2017</u>
Construction in progress	\$ 843,042	\$ 308,815
Infrastructure	10,946,415	10,946,415
Accumulated depreciation	<u>(4,797,871)</u>	<u>(4,415,313)</u>
Total Capital Assets (Net)	<u>\$ 6,991,586</u>	<u>\$ 6,839,917</u>

During the year, \$534,277 was added to construction in progress and depreciation was \$382,558.

General Fund Budgetary Highlights

The budget was exceeded by actual expenditures for the year primarily because actual expenditures for the perimeter wall project were not budgeted.

The budget was not amended for fiscal year September 30, 2018.

Debt Management

Governmental Activities debt includes the following:

In October 2005, the District issued \$6,375,000 Series 2005 Special Assessment Revenue Bonds. The Bonds were issued to finance the acquisition and construction of certain improvements within the District. During the year, the District failed to meet the scheduled debt service requirements and the Series 2005 Bonds remain in default. Matured bonds payable totaled \$1,130,000 at September 30, 2018. The unmaturred balance outstanding at September 30, 2018 was \$4,975,000.

In March 2013, the District issued \$5,730,000 Series 2013 Special Assessment Revenue Refunding Bonds. The bonds were issued to refund the Series 2003A Special Assessment Revenue Bonds. The balance outstanding at September 30, 2018 was \$4,650,000.

**Portofino Isles Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
For the Year Ended September 30, 2018**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Economic Factors and Next Year's Budget

The District is dependent on the continued involvement of the bondholders and the special purpose entity that owns certain land within the District. The District does not anticipate any major economic changes in the next fiscal year.

Request for Information

The financial report is designed to provide a general overview of Portofino Isles Community Development District's finances for all those with an interest. Questions concerning any of the information provided in this report or requests for additional information should be addressed to the Portofino Isles Community Development District, Governmental Management Services SF, 5385 N Nob Hill Road, Sunrise, Florida 33351.

Portofino Isles Community Development District
STATEMENT OF NET POSITION
September 30, 2018

	Governmental Activities
ASSETS	
Current Assets	
Cash	\$ 370,949
Investments	154,828
Assessments receivable	915
Due from other governments	3,604
Prepaid expenses	5,778
Total Current Assets	536,074
Non-Current Assets	
Restricted:	
Investments	864,689
Capital Assets Not Being Depreciated:	
Construction in progress	843,042
Capital Assets Being Depreciated:	
Infrastructure	10,946,415
Less: accumulated depreciation	(4,797,871)
Total Non-Current Assets	7,856,275
Total Assets	8,392,349
 DEFERRED OUTFLOWS OF RESOURCES	
Deferred amount on refunding	198,153
 LIABILITIES	
Current Liabilities	
Accounts payable and accrued expenses	33,918
Matured interest payable	2,735,040
Matured bonds payable	1,130,000
Accrued interest	227,295
Bonds payable-current	395,000
Total Current Liabilities	4,521,253
Non-Current Liabilities	
Bonds payable	9,230,000
Total Liabilities	13,751,253
 NET POSITION	
Net investment in capital assets	(2,653,218)
Restricted for capital projects	23,843
Unrestricted	(2,531,376)
Total Net Position	\$ (5,160,751)

See accompanying notes to financial statements.

Portofino Isles Community Development District
STATEMENT OF ACTIVITIES
For the Year Ended September 30, 2018

Functions/Programs	Expenses	Program Revenues		Net (Expenses) Revenues and Changes in Net Position
		Charges for Services	Capital Grants and Contributions	Governmental Activities
Primary government				
Governmental Activities				
General government	\$ (171,512)	\$ 72,325	\$ -	\$ (99,187)
Physical environment	(511,514)	91,234	17,250	(403,030)
Interest and other costs	(562,538)	505,646	-	(56,892)
Total Governmental Activities	\$ (1,245,564)	\$ 669,205	\$ 17,250	(559,109)
General Revenues:				
				13,011
				192,072
				205,083
				(354,026)
				(4,806,725)
				\$ (5,160,751)

See accompanying notes to financial statements.

Portofino Isles Community Development District
BALANCE SHEET
GOVERNMENTAL FUNDS
September 30, 2018

ASSETS	Governmental Funds			Total
	General	Debt Service	Capital Projects	Governmental Funds
Cash	\$ 370,949	\$ -	\$ -	\$ 370,949
Investments	154,828	-	-	154,828
Assessments receivable	915	-	-	915
Due from other funds	906	-	-	906
Due from other governments	776	2,828	-	3,604
Prepaid expenses	5,778	-	-	5,778
Restricted assets:				
Investments, at fair value	-	840,846	23,843	864,689
Total Assets	\$ 534,152	\$ 843,674	\$ 23,843	\$ 1,401,669
LIABILITIES AND FUND BALANCES				
LIABILITIES				
Accounts payable and accrued expenses	\$ 33,918	\$ -	\$ -	\$ 33,918
Due to other funds	-	906	-	906
Matured principal payable	-	1,130,000	-	1,130,000
Matured interest payable	-	2,735,040	-	2,735,040
Total Liabilities	33,918	3,865,946	-	3,899,864
FUND BALANCES				
Nonspendable - prepaid expenses	5,778	-	-	5,778
Restricted for capital projects	-	-	23,843	23,843
Unassigned	494,456	(3,022,272)	-	(2,527,816)
Total Fund Balances	500,234	(3,022,272)	23,843	(2,498,195)
Total Liabilities and Fund Balances	\$ 534,152	\$ 843,674	\$ 23,843	\$ 1,401,669

See accompanying notes to financial statements.

Portofino Isles Community Development District
RECONCILIATION OF TOTAL GOVERNMENTAL FUND BALANCES
TO NET POSITION OF GOVERNMENTAL ACTIVITIES
September 30, 2018

Total Governmental Fund Balances	\$ (2,498,195)
Amounts reported for governmental activities in the Statement of Net Position are different because:	
Capital assets not being depreciated, construction in progress, used in governmental activities are not current financial resources and therefore, are not reported at the fund level.	843,042
Capital assets being depreciated, infrastructure, \$10,946,415, net of accumulated depreciation, \$(4,797,871), used in governmental activities are not current financial resources and therefore, are not reported at the fund level.	6,148,544
Deferred amount on refunding, \$264,833, net of accumulated amortization, \$(66,680), used in governmental activities are not current financial resources and therefore, are not reported at the fund level.	198,153
Long-term liabilities, including bonds payable, are not due and payable in the current period, and therefore, are not reported at the fund level.	(9,625,000)
Accrued interest expense for long-term debt is not a current financial use and therefore, is not reported at the fund level.	<u>(227,295)</u>
Net Position of Governmental Activities	<u><u>\$ (5,160,751)</u></u>

See accompanying notes to financial statements.

Portofino Isles Community Development District
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
GOVERNMENTAL FUNDS
For the Year Ended September 30, 2018

	<u>Governmental Funds</u>			<u>Total Governmental Funds</u>
	<u>General</u>	<u>Debt Service</u>	<u>Capital Projects</u>	
Revenues				
Special assessments	\$ 163,559	\$ 505,646	\$ -	\$ 669,205
Intergovernmental revenues	192,072	-	-	192,072
Contributions from others	17,250	-	-	17,250
Investment earnings	2,960	9,500	551	13,011
Total Revenues	<u>375,841</u>	<u>515,146</u>	<u>551</u>	<u>891,538</u>
Expenditures				
Current				
General government	102,229	15,262	54,021	171,512
Physical environment	128,956	-	-	128,956
Capital outlay	534,227	-	-	534,227
Debt service				
Principal	-	380,000	-	380,000
Interest	-	551,411	-	551,411
Total Expenditures	<u>765,412</u>	<u>946,673</u>	<u>54,021</u>	<u>1,766,106</u>
Net change in fund balances	(389,571)	(431,527)	(53,470)	(874,568)
Fund Balances - October 1, 2017	<u>889,805</u>	<u>(2,590,745)</u>	<u>77,313</u>	<u>(1,623,627)</u>
Fund Balances - September 30, 2018	<u>\$ 500,234</u>	<u>\$ (3,022,272)</u>	<u>\$ 23,843</u>	<u>\$ (2,498,195)</u>

See accompanying notes to financial statements.

Portofino Isles Community Development District
RECONCILIATION OF THE STATEMENT OF REVENUES, EXPENDITURES AND
CHANGES IN FUND BALANCES OF GOVERNMENTAL FUNDS TO THE
STATEMENT OF ACTIVITIES
For the Year Ended September 30, 2018

Net Change in Fund Balances - Total Governmental Funds \$ (874,568)

Amounts reported for governmental activities in the Statement of Activities are different because:

Governmental funds report capital outlays as expenditures. However, in the Statement of Activities, the cost of those assets is allocated over their estimated useful lives as depreciation. This is the amount that depreciation, \$(382,558), was exceeded by capital outlay, \$534,227, in the current year. 151,669

Repayments of bond principal are expenditures in the governmental funds and reduce long-term liabilities in the Statement of Net Position. 380,000

The deferred amount on refunding is recognized as deferred outflow of resources at the government-wide level and amortized over the life of the bonds as interest. This is the amount of amortization in the current period. (13,588)

In the Statement of Activities, interest is accrued on outstanding and matured bonds; whereas in governmental funds, interest expenditures are reported when due. This is the increase in accrued interest from the prior year. 2,461

Change in Net Position of Governmental Activities \$ (354,026)

See accompanying notes to financial statements.

Portofino Isles Community Development District
STATEMENT OF REVENUES, EXPENDITURES AND
CHANGES IN FUND BALANCES - BUDGET AND ACTUAL -
GENERAL FUND
For the Year Ended September 30, 2018

	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>	<u>Variance with Final Budget Positive (Negative)</u>
Revenues				
Special assessments	\$ 175,152	\$ 175,152	\$ 163,559	\$ (11,593)
Intergovernmental revenues	186,678	186,678	192,072	5,394
Contributions from others	-	-	17,250	17,250
Investment earnings	-	-	2,960	2,960
Total Revenues	<u>361,830</u>	<u>361,830</u>	<u>375,841</u>	<u>14,011</u>
Expenditures				
Current				
General government	123,548	123,548	102,229	21,319
Physical environment	212,409	212,409	128,956	83,453
Capital outlay	300	300	534,227	(533,927)
Total Expenditures	<u>336,257</u>	<u>336,257</u>	<u>765,412</u>	<u>(429,155)</u>
Net change in fund balances	<u>25,573</u>	<u>25,573</u>	<u>(389,571)</u>	<u>(415,144)</u>
Fund Balances - October 1, 2017	<u>49,689</u>	<u>49,689</u>	<u>889,805</u>	<u>840,116</u>
Fund Balances - September 30, 2018	<u>\$ 75,262</u>	<u>\$ 75,262</u>	<u>\$ 500,234</u>	<u>\$ 424,972</u>

See accompanying notes to financial statements.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The financial statements of the District have been prepared in conformity with generally accepted accounting principles (GAAP) as applied to governmental units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The District's more significant accounting policies are described below.

1. Reporting Entity

The District was established on August 22, 2002 pursuant to City of Port St. Lucie, Florida Ordinance Number 02-80 and Chapter 190, Florida Statutes. The District was established for the purposes of financing and managing the acquisition, construction, maintenance and operation of the infrastructure necessary for community development within its jurisdiction. The District is authorized to issue bonds for the purpose, among others, of financing, funding, planning, establishing, acquiring, constructing or re-constructing, enlarging or extending, equipping, operating and maintaining water management, bridges or culverts, district roads, landscaping, street lights and other basic infrastructure projects within or outside the boundaries of the Portofino Isles Community Development District. The District is governed by a five-member Board of Supervisors elected at large by the property owners within the District. The District operates within the criteria established by Chapter 190, Florida Statutes.

As required by GAAP, these financial statements present the Portofino Isles Community Development District (the primary government) as a stand-alone government. The reporting entity for the District includes all functions of government in which the District's Board exercises oversight responsibility including, but not limited to, financial interdependency, selection of governing authority, designation of management, significant ability to influence operations and accountability for fiscal matters.

Based upon the application of the above-mentioned criteria as set forth in Governmental Accounting Standards Board, the District has identified a discretely-presented component unit.

The Discretely-presented component units are legally separate entities which did not meet the criteria for blending. One of the component units is reported in separate columns to emphasize that it is legally separate from the District. The component units of the District is as follows:

Portofino Isles Community Development District Holdings, LLC – The Company is a special purpose entity (SPE) created by certain provisions in the Trust Indentures of the Series 2005 Special Assessment Revenue Bonds for the benefit of the District and the bondholders. The Trustee of this component unit has elected not to provide the District with its financial information.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting

The basic financial statements of the District are composed of the following:

- Government-wide financial statements
- Fund financial statements
- Notes to financial statements

a. Government-wide Financial Statements

Government-wide financial statements report all non-fiduciary information about the reporting government as a whole. These statements include all the governmental activities of the primary government. The effect of interfund activity has been removed from these statements.

Governmental activities are supported by developer contributions and interest. Program revenues include charges for services and payments made by parties outside of the reporting government's citizenry if that money is restricted to a particular program. Program revenues are netted with program expenses in the Statement of Activities to present the net cost of each program.

Amounts paid to acquire capital assets are capitalized as assets, rather than reported as an expenditure. Proceeds of long-term debt are recorded as liabilities in the government-wide financial statements, rather than as another financing source.

Amounts paid to reduce long-term indebtedness of the reporting government are reported as a reduction of the related liability, rather than as an expenditure.

b. Fund Financial Statements

The underlying accounting system of the District is organized and operated on the basis of separate funds, each of which is considered to be a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, liabilities, fund equity, revenues and expenditures or expenses, as appropriate. Governmental resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled.

Fund financial statements for the primary government's governmental funds are presented after the government-wide financial statements. These statements display information about major funds individually.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting (Continued)

b. Fund Financial Statements (Continued)

Governmental Funds

The District classifies fund balance according to the Governmental Accounting Standards Board Statement 54 – *Fund Balance Reporting and Governmental Fund Type Definitions*. The Statement requires the fund balance for governmental funds to be reported in classifications that comprise a hierarchy based primarily on the extent to which the government is bound to honor constraints on the specific purposes for which amounts in those funds can be spent.

The District has various policies governing the fund balance classifications.

Nonspendable Fund Balance – This classification consists of amounts that cannot be spent because they are either not in spendable form or are legally or contractually required to be maintained intact.

Restricted Fund Balance – This classification includes amounts that can be spent only for specific purposes stipulated by the state constitution, external resource providers, or through enabling legislation.

Assigned Fund Balance – This classification consists of the Board of Supervisors' intent to be used for specific purposes, but are neither restricted nor committed. The assigned fund balances can also be assigned by the District's management company.

Unassigned Fund Balance – This classification is the residual classification for the government's general fund and includes all spendable amounts not contained in the other classifications. Unassigned fund balance is considered to be utilized first when an expenditure is incurred for purposes for which amounts in any of those unrestricted fund balance classifications could be used.

Governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are considered to be available when they are collected within the current period or soon thereafter to pay liabilities of the current period. For this purpose, the District considers revenues to be available if they are collected within 60 days of the end of the current fiscal period.

Expenditures generally are recorded when a liability is incurred, as under accrual accounting. Interest associated with the current fiscal period is considered to be an accrual item and so has been recognized as revenue of the current fiscal period.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting (Continued)

b. Fund Financial Statements (Continued)

Governmental Funds (Continued)

Under the current financial resources measurement focus, only current assets and current liabilities are generally included on the balance sheet. The reported fund balance is considered to be a measure of “available spendable resources”. Governmental fund operating statements present increases (revenues and other financing sources) and decreases (expenditures and other financing uses) in net current assets. Accordingly, they are said to present a summary of sources and uses of “available spendable resources” during a period.

Because of their spending measurement focus, expenditure recognition for governmental fund types excludes amounts represented by non-current liabilities. Since they do not affect net current assets, such long-term amounts are not recognized as governmental fund type expenditures or fund liabilities.

Amounts expended to acquire capital assets are recorded as expenditures in the year that resources are expended, rather than as fund assets. The proceeds of long-term debt are recorded as other financing source rather than as a fund liability.

Debt service expenditures are recorded only when payment is due.

3. Basis of Presentation

a. Governmental Major Funds

General Fund – The General Fund is the District’s primary operating fund. It accounts for all financial resources of the general government, except those required to be accounted for in another fund.

Debt Service Fund – Accounts for debt service requirements to retire the special assessment revenue bonds which were used, among other things, to retire the debt of the bond anticipation notes and to finance the acquisition and construction of certain master infrastructure improvements within the District.

Capital Projects Fund – The Capital Projects Fund accounts for construction of certain infrastructure improvements within the boundaries of the District.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

3. Basis of Presentation (Continued)

b. Non-current Governmental Assets/Liabilities

GASB Statement 34 requires that non-current governmental assets, such as land and buildings, and non-current governmental liabilities, such as general obligation bonds, be reported in the governmental activities column in the government-wide Statement of Net Position.

4. Assets, Liabilities, and Net Position or Equity

a. Cash and Investments

Chapter 280, Florida Statutes require state and local governmental units to deposit monies with financial institutions classified as "Qualified Public Depositories," a multiple financial institution pool whereby groups of securities pledged by the various financial institutions provide common collateral from their deposits of public funds. This pool is provided as additional insurance to the federal depository insurance and allows for additional assessments against the member institutions, providing full insurance for public deposits.

The District is authorized to invest in those financial instruments as established by Section 218.415, Florida Statutes. The authorized investments consist of:

1. Direct obligations of the United States Treasury;
2. The Local Government Surplus Funds Trust or any intergovernmental investment pool authorized pursuant to the Florida Interlocal Cooperative Act of 1969;
3. Interest-bearing time deposits or savings accounts in authorized qualified public depositories;
4. Securities and Exchange Commission, registered money market funds with the highest credit quality rating from a nationally recognized rating agency.

b. Restricted Assets

Certain net position of the District will be classified as restricted assets on the statement of net position because their use is limited either by law through constitutional provisions or enabling legislation; or by restrictions imposed externally by creditors.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

4. Assets, Liabilities, and Net Position or Equity (Continued)

c. Capital Assets

Capital assets, which include infrastructure and construction in progress, are reported in governmental activities.

The District defines capital assets as assets with an initial, individual cost of \$5,000 or more and an estimated useful life in excess of two years. The valuation basis for all assets is historical cost.

The costs of normal maintenance and repairs that do not add to the value of the asset or materially extend its useful life are not capitalized. Major outlays for capital assets and improvements are capitalized as projects are constructed.

Depreciation of capital assets is computed and recorded by utilizing the straight-line method. Estimated useful lives of the various classes of depreciable capital assets are as follows:

Infrastructure	10-40 years
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d. Budgets

Budgets are prepared and adopted after public hearings for the governmental funds, pursuant to Chapter 190, Florida Statutes. The District utilizes the same basis of accounting for budgets as it does for revenues and expenditures in its various funds. Formal budgets are adopted for the general fund. The legal level of budgetary control is at the fund level. As a result, deficits in the budget variance columns of the accompanying financial statements may occur. All budgeted appropriations lapse at year end.

e. Deferred Outflows of Resources

Deferred outflow of resources is the consumption of net position by the government that is applicable to a future reporting period. Deferred amount on refunding is amortized and recognized as a component of interest expense over the life of the bond.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE B – RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS

1. Explanation of Differences Between the Governmental Fund Balance Sheet and the Government-wide Statement of Net Position

“Total fund balances” of the District’s governmental funds, \$(2,498,195), differs from “net position” of governmental activities, \$(5,160,751), reported in the Statement of Net Position. This difference primarily results from the long-term economic focus of the Statement of Net Position versus the current financial resources focus of the Governmental Fund Balance Sheet. The effect of the differences is illustrated below.

Capital related items

When capital assets (improvements and infrastructure that are to be used in governmental activities) are purchased or constructed, the cost of those assets is reported as expenditures in governmental funds. However, the Statement of Net Position included those capital assets among the assets of the District as a whole.

Construction in progress	\$	843,042
Infrastructure		10,946,415
Accumulated depreciation		<u>(4,797,871)</u>
Total		<u><u>\$ 6,991,586</u></u>

Long-term debt transactions

Long-term liabilities applicable to the District’s governmental activities are not due and payable in the current period and accordingly are not reported as fund liabilities. All liabilities are reported in the Statement of Net Position. Balances at September 30, 2018 were:

Bonds payable	\$	(9,625,000)
Deferred amount on refunding		264,833
Accumulated amortization		<u>(66,680)</u>
Total		<u><u>\$ (9,426,047)</u></u>

Accrued interest

Accrued liabilities in the Statement of Net Position differ from the amount reported in governmental funds due to the accrued interest on bonds.

Accrued interest	\$	<u><u>(227,295)</u></u>
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Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE B – RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS (CONTINUED)

2. Explanation of Differences Between the Governmental Fund Operating Statements and the Statement of Activities

The “net change in fund balances” for government funds, \$(874,568), differs from the “change in net position” for governmental activities, \$(354,026), reported in the Statement of Activities. The differences arise primarily from the long-term economic focus of the Statement of Activities versus the current financial resources focus of the governmental funds. The effect of the differences is illustrated below.

Capital related items

When capital assets that are to be used in governmental activities are purchased or constructed, the resources expended for those assets are reported as expenditures in governmental funds. However, in the Statement of Activities, the costs of those assets is allocated over their estimated useful lives and reported as depreciation expense. As a result, fund balances decrease by the amount of financial resources expended, whereas net position decrease by the amount of depreciation expense charged for the year.

Capital outlay		\$	534,227
Depreciation			<u>(382,558)</u>
Total			<u><u>151,669</u></u>

Long-term debt transactions

Repayments of bond principal are reported as expenditures in the governmental funds and, thus, have the effect of reducing fund balance because current financial resources have been used.

Bond principal payments		\$	380,000
Amortization of bond discounts			<u>(13,588)</u>
Total			<u><u>366,412</u></u>

Some expenses reported in the Statement of Activities do not require the use of current financial resources, therefore, are not reported as expenditures in governmental funds.

Net change in accrued interest payable		\$	<u><u>2,461</u></u>
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Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE C – CASH AND INVESTMENTS

All deposits are held in qualified public depositories and are included on the accompanying balance sheet as cash and investments.

Custodial Credit Risk – Deposits

Custodial credit risk is the risk that in the event of a bank failure, the District's deposits may not be returned to it. The District follows the provisions of Chapter 280, Florida Statutes regarding deposits and investments. As of September 30, 2018, the District's bank balance was \$379,965 and the carrying value was \$370,949. Exposure to custodial credit risk was as follows. The District maintains all deposits in a qualified public depository in accordance with the provisions of Chapter 280, Florida Statutes, which means that all deposits are fully insured by Federal Depositors Insurance or collateralized under Chapter 280, Florida Statutes.

As of September 30, 2018, the District had the following investments and maturities:

<u>Investment</u>	<u>Maturities</u>	<u>Fair Value</u>
First American Government Obligation Fund CI Y	26 days*	\$ 389,946
Fidelity Government Portfolio CI III	36 days*	474,743
Florida Prime Local Government Surplus Fund	33 days*	154,828
Total		<u>\$ 1,019,517</u>

*Maturity is a weighted average maturity.

The District categorizes its fair value measurements within the fair value hierarchy recently established by generally accepted accounting principles. The fair value is the price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. The District uses a market approach in measuring fair value that uses prices and other relevant information generated by market transactions involving identical or similar assets, liabilities, or groups of assets and liabilities.

Assets or liabilities are classified into one of three levels. Level 1 is the most reliable and is based on quoted price for identical assets, or liabilities, in an active market. Level 2 uses significant other observable inputs when obtaining quoted prices for identical or similar assets, or liabilities, in markets that are not active. Level 3 is the least reliable and uses significant unobservable inputs that use the best information available under the circumstances, which includes the District's own data in measuring unobservable inputs.

Based on the criteria in the preceding paragraph, the investments in First American Government Obligation Funds CI Y and Fidelity Government Portfolio CI III are Level 1 investments.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE C – CASH AND INVESTMENTS (CONTINUED)

Interest Rate Risk

The formal investment policy of the District conforms with State statutory requirements and bond indentures for investment maturities as a means of managing its exposure to increasing interest rates.

Credit Risk

The District's investments are limited by state statutory requirements and bond compliance. The District has no investment policy that would further limit its investment choices.

Concentration of Credit Risk

The District places no limit on the amount it may invest in any one investment. The investments in First American Government Obligation Fund CI Y is 38%, Fidelity Government Portfolio CI III is 47% and Florida Prime is 15% of the District's total investments.

The types of deposits and investments and their level of risk exposure as of September 30, 2018 were typical of these items during the fiscal year then ended. The District considers any decline in fair value for certain investments to be temporary.

NOTE D – CAPITAL ASSETS

Capital Asset activity for the year ended September 30, 2018 was as follows:

	Balance October 1, 2017	Additions	Deletions	Balance September 30, 2018
<u>Governmental Activities:</u>				
Capital Assets, Not Being Depreciated:				
Construction in progress	\$ 308,815	\$ 534,227	\$ -	\$ 843,042
Capital Assets, Being Depreciated:				
Infrastructure	10,946,415	-	-	10,946,415
Less Accumulated Depreciation for:				
Infrastructure	(4,415,313)	(382,558)	-	(4,797,871)
Total Capital Assets Depreciated, Net	6,531,102	(382,558)	-	6,148,544
Governmental Activities Capital Assets	<u>\$ 6,839,917</u>	<u>\$ 151,669</u>	<u>\$ -</u>	<u>\$ 6,991,586</u>

Depreciation of \$382,558 was charged to physical environment.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE E – LONG-TERM DEBT

The following is a summary of debt activity for the District for the year ended September 30, 2018:

Bonds payable at October 1, 2017	\$ 10,005,000
Principal payments	(380,000)
Long-term Debt at September 30, 2018	<u>\$ 9,625,000</u>

During the year, the scheduled debt service payment for the Series 2005 Bond, \$155,000, was not paid by the District. This amount is reflected in the balance of matured bonds payable and matured interest payable in the accompanying financial statements.

District debt is comprised of the following at September 30, 2018:

Special Assessment Revenue Bonds, Series 2005

\$6,375,000 Series 2005 Bonds, interest at 5.6%, maturing thru May 1, 2036, payable on May 1 and November 1; collateralized by the pledged revenues of special assessments levied against the benefited property owners. \$ 4,975,000

Special Assessment Revenue Refunding Bonds, Series 2013

\$5,730,000 Series 2013 Bonds, interest from 1.375% to 4.75%, maturing thru May 1, 2033, payable on May 1 and November 1; collateralized by the pledged revenues of special assessments levied against the benefited property owners. 4,650,000

Bonds Outstanding \$ 9,625,000

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE E – LONG-TERM DEBT (CONTINUED)

The annual requirements to amortize the principal and interest of long term debt as of September 30, 2018 are as follows:

Year Ending September 30,	Principal	Interest	Total
2019	\$ 395,000	\$ 482,225	\$ 877,225
2020	410,000	466,085	876,085
2021	430,000	448,648	878,648
2022	450,000	429,713	879,713
2023	470,000	409,230	879,230
2024-2028	2,735,000	1,676,469	4,411,469
2029-2033	3,525,000	900,883	4,425,883
2034-2036	1,210,000	138,040	1,348,040
Totals	<u>\$ 9,625,000</u>	<u>\$ 4,951,293</u>	<u>\$ 14,576,293</u>

Summary of Significant Bonds Resolution Terms and Covenants

SPECIAL ASSESSMENT REVENUE BONDS, SERIES 2005 AND SERIES 2013

Depository Funds – The bond resolution establishes certain funds and determines the order in which revenues are to be deposited into these funds. A description of the significant funds, including their purposes, is as follows:

1. Reserve Funds – The 2005 and 2013 Reserve Accounts are funded from the proceeds of the Series 2005 Bonds and the Series 2013 Bonds in an amount equal to the highest remaining debt service payment. Monies held in the reserve accounts will be used only for the purposes established in the Trust Indenture.

	Special Assessment Bonds	
	Reserve Balance	Reserve Requirement
Special Assessment Revenue Bonds, Series 2005	\$ 411	\$ 421,245
Special Assessment Revenue Refunding Bonds, Series 2013	\$ 217,546	\$ 216,069

The District did not make the scheduled principal and interest payments in the current year and the Special Assessment Bonds, Series 2005 remain in default for this bond series.

Portofino Isles Community Development District
NOTES TO FINANCIAL STATEMENTS
September 30, 2018

NOTE F – RISK MANAGEMENT

The government is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; and natural disasters for which the government carries commercial insurance.

NOTE G – JOINT PARTICIPATION AGREEMENT

The District and the Newport Isles Property Owners' Association (POA) entered into a Joint Participation Agreement to fund certain improvements within the District. During the current year the POA contributed \$17,250 and the District spent \$534,227 on an improvement project.

NOTE H – DEFICIT FUND BALANCE

The Debt Service Fund had a deficit fund balance of \$(3,022,272) at September 30, 2018. The District is working with the SPE and the bondholders to cover the deficit balance.



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**INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL
REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT
OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH
GOVERNMENT AUDITING STANDARDS**

To the Board of Supervisors
Portofino Isles Community Development District
City of Port St. Lucie, Florida

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Portofino Isles Community Development District, as of and for the year ended September 30, 2018, and the related notes to the financial statements, and have issued our report thereon dated April 24, 2019.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered Portofino Isles Community Development District's internal control over financial reporting to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Portofino Isles Community Development District's internal control. Accordingly, we do not express an opinion on the effectiveness of Portofino Isles Community Development District's internal control over financial reporting.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Board of Supervisors
Portofino Isles Community Development District

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Portofino Isles Community Development District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

We noted certain matters that we reported to the management of Portofino Isles Community Development District in a separate letter dated April 24, 2019.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



Berger, Toombs, Elam, Gaines & Frank
Certified Public Accountants
Fort Pierce, Florida

April 24, 2019



Berger, Toombs, Elam, Gaines & Frank

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MANAGEMENT LETTER

To the Board of Supervisors
Portofino Isles Community Development District
City of Port St. Lucie, Florida

Report on the Financial Statements

We have audited the financial statements of the Portofino Isles Community Development District as of and for the year ended September 30, 2018, and have issued our report thereon dated April 24, 2019.

Auditor's Responsibility

We conducted our audit in accordance with auditing standards generally accepted in the United States; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States and Chapter 10.550, Rules of the Auditor General.

Other Reporting Requirements

We have issued our Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards* and Independent Accountant's Report on an examination conducted in accordance with AICPA Professional Standards, AT-C Section 315, regarding compliance requirements in accordance with Chapter 10.550, Rules of the Auditor General. Disclosures in those reports, which are dated April 24, 2019, should be considered in conjunction with this management letter.

Prior Audit Findings

Section 10.554(1)(i)1., Rules of the Auditor General, requires that we determine whether or not corrective actions have been taken to address findings and recommendations made in the preceding financial audit report. The current status of the prior comments is as follows:

2014-01, 2015-01, 2016-01

The debt service fund continues to maintain a deficit fund balance, \$(3,022,272), at September 30, 2018. The special assessments associated with the Series 2005 Bonds have not been collected since 2010 and therefore after the reserve fund was depleted there have not been funds available to make the required debt service payments. The Series 2005 Bonds are considered in default and in accordance with the bond indenture an SPE was established in a prior year to own, manage, maintain and dispose of certain property associated with the delinquent Series 2005 Bond special assessments.

To the Board of Supervisors
Portofino Isles Community Development District

Management Response:

The deteriorating financial condition of the District is due to annual assessments not being paid by certain property owner(s) within the District. The property has been conveyed to a SPE in lieu of foreclosure to own, manage, maintain and dispose of the property in an orderly and efficient manner. The SPE has agreed to provide the necessary funding to pay the operating expenditures of the District and the District has agreed to defer the collection of Capital Assessments encumbering the Property. The District has determined this course of action is the most appropriate way to alleviate the deteriorating financial condition. In addition, the "deteriorating financial condition of the District" should be limited solely to the special assessment bonds issued by the District in 2005 to fund infrastructure improvements for the Portofino Court Project (the "Series 2005 Bonds"), and not to the District as a whole. This position is based, in part, on the provisions of the Master Trust Indenture relating to the Series 2005 Bonds (the "Master Trust Indenture") and the SPE Agreement entered into between the District and the SPE.

It is important to emphasize that the Series 2005 Bonds are not general obligation bonds of the District. They are special assessment bonds secured solely by the special assessments levied against the property in the Portofino Court Project where the District assessments were in default and being foreclosed. Thus, no other revenue or assets of the District are pledged toward the payment of debt service on the Series 2005 Bonds. The 2013 Refunding Bonds issued by the District, which are not in default, relate to the Newport Isles portion of the District and are totally unrelated to the Series 2005 Bonds. Moreover, the District is bound by the SPE Agreement not to pursue the collection of special assessments on the Portofino Court property (the only source of pledged revenues to pay debt service on the Series 2005 Bonds) until further direction of the Majority Owner of the Series 2005 Bonds. Thus, the District has been effectively precluded by the bondholders themselves from pursuing any attempt to collect funds from the only source of revenue legally available to pay debt service on the Series 2005 Bonds.

Current Status:

The District did not make the required debt service payments on the Series 2005 Bond during the fiscal year ended September 30, 2018.

Financial Condition and Management

Section 10.554(1)(i)5.a. and 10.556(7), Rules of the Auditor General, require us to apply appropriate procedures and communicate the results of our determination as to whether or not Portofino Isles Community Development District has met one or more of the conditions described in Section 218.503(1), Florida Statutes, and identification of the specific conditions met. In connection with our audit, we determined that the Portofino Isles Community Development District did meet one of the conditions described in Section 218.503(1), Florida Statutes in that the District did not make certain scheduled debt service payments and did not meet debt service reserve requirements.

To the Board of Supervisors
Portofino Isles Community Development District

Pursuant to Sections 10.554(1)(i)5.c. and 10.556(8), Rules of the Auditor General, we applied financial conditions assessment procedures for Portofino Isles Community Development District. It is management's responsibility to monitor Portofino Isles Community Development District's financial condition; our financial condition assessment was based in part on the representations made by management and the review of the financial information provided by the same.

Section 10.554(1)(i)2., Rules of the Auditor General, requires that we address in the Management Letter any recommendations to improve financial management. In connection with our audit, we did not have any such recommendations.

Additional Matters

Section 10.554(1)(i)3., Rules of the Auditor General, requires that we address noncompliance with provisions of contracts or grant agreements, or abuse, that have occurred, or are likely to have occurred, that have an effect on the financial statements that is less than material but which warrants the attention of those charged with governance. In connection with our audit, we did not have any findings in addition to the current status of prior audit findings noted above.

Purpose of this Letter

Our Management Letter is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the Florida Auditor General, Federal and other granting agencies, the Board of Supervisors, and applicable management, and is not intended to be and should not be used by anyone other than these specified parties.

*Berger Toombs Elam
Gaines & Frank*

Berger, Toombs, Elam, Gaines & Frank
Certified Public Accountants PL
Fort Pierce, Florida

April 24, 2019



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**INDEPENDENT ACCOUNTANT'S REPORT/COMPLIANCE
WITH SECTION 218.415, FLORIDA STATUTES**

To the Board of Supervisors
Portofino Isles Community Development District
City of Port St. Lucie, Florida

We have examined Portofino Isles Community Development District's compliance with Section 218.415, Florida Statutes during the year ended September 30, 2018. Management is responsible for Portofino Isles Community Development District's compliance with those requirements. Our responsibility is to express an opinion on Portofino Isles Community Development District's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about Portofino Isles Community Development District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on Portofino Isles Community Development District's compliance with the specified requirements.

In our opinion, Portofino Isles Community Development District complied, in all material respects, with the aforementioned requirements during the year ended September 30, 2018.

*Berger Toombs Elam
Gaines & Frank*

Berger, Toombs, Elam, Gaines & Frank
Certified Public Accountants PL
Fort Pierce, Florida

April 24, 2019