Financial Report

Year Ended September 30, 2019

Belmont Community District Development

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INDEPENDENT AUDITOR'S REPORT

To the Board of Supervisors

Belmont Community Development District

Report on the Financial Statements

We have audited the accompanying financial statements of the governmental activities, and each major fund of the *Belmont Community Development District* (the "District"), as of and for the year ended September 30, 2019, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

The District's 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 opinions on these financial statements based on our audit. We conducted our audit in accordance with 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of 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 principles 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 opinions.

Opinions

In our opinion, the financial statements referred to above 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, 2019, and the respective changes in financial position thereof and the respective budgetary comparison for the General Fund for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis starting on page 3, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the 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 to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about 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 June 11, 2020, on our consideration of the District's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, grant agreements and other matters. The purpose of that report is solely 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 the 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 the District's internal control over financial reporting and compliance.

McDirmit Davis

Orlando, Florida June 11, 2020 Our discussion and analysis of *Belmont Community Development District*, Hillsborough County, Florida's (the "District") financial accomplishments provide an overview of the District's financial activities for the year ended September 30, 2019. Please read it in conjunction with the District's Independent Auditor's Report, financial statements and accompanying notes.

This information is being presented to provide additional information regarding the activities of the District and to meet the disclosure requirements of Government Accounting Standards Board Statement (GASB) No. 34, Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments issued June 1999.

Financial Highlights

- The assets of the District exceeded its liabilities at September 30, 2019 by \$18,667,380, an increase in net position of \$2,774,878 in comparison with the prior year.
- At September 30, 2019, the District's governmental funds reported fund balances of \$4,450,951, a decrease of \$2,299,170 in comparison with the prior year.

Overview of the Financial Statements

This discussion and analysis is intended to serve as an introduction to *Belmont Community Development District*'s financial statements. The District's financial statements are comprised of three components: 1) government-wide financial statements, 2) fund financial statements and 3) notes to financial statements.

Government-Wide Financial Statements

The government-wide financial statements are designed to provide readers with a broad overview of the District's finances, in a manner similar to a private-sector business.

The statement of net position presents information on all of the District's assets, deferred outflows and liabilities, with the difference reported as net position. Over time, increases or decreases in net position may serve as a useful indicator of whether the financial position of the District is improving or deteriorating.

The statement of activities presents information showing how the government's net position changed during the most recent fiscal year. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, regardless of the timing of related cash flows. Thus, revenues and expenses are reported in this statement for some items that will result in cash flows in future fiscal periods.

The government-wide financial statements include all governmental activities that are principally supported by special assessment revenues. The District does not have any business-type activities. The governmental activities of the District include general government, physical environment, culture and recreation, and roads and streets related functions.

Fund Financial Statements

A fund is a grouping of related accounts that is used to maintain control over resources that have been segregated for specific activities or objectives. The District, like other state and local governments, uses fund accounting to ensure and demonstrate compliance with finance-related legal requirements. The District has one fund category: Governmental Funds.

Governmental Funds

Governmental funds are used to account for essentially the same functions reported as governmental activities in the government-wide financial statements. However, unlike the government-wide financial statements, governmental fund financial statements focus on near-term inflows and outflows of spendable resources, as well as on balances of spendable resources available at the end of the fiscal year. Such information may be useful in evaluating a District's near-term financing requirements.

Because the focus of governmental funds is narrower than that of the government-wide financial statements, it is useful to compare the information presented for governmental funds with similar information presented for governmental activities in the government-wide financial statements. By doing so, readers may better understand the long-term impact of the government's near-term financing decisions. Both the governmental fund balance sheet and the governmental fund statement of revenues, expenditures and changes in fund balances provide a reconciliation to facilitate this comparison between governmental funds and governmental activities.

The District maintains three individual governmental funds. Information is presented separately in the governmental fund balance sheet and the governmental fund statement of revenues, expenditures and changes in fund balances for the general fund, debt service fund and capital projects fund all of which are considered to be major funds.

The District adopts an annual appropriated budget for its general fund. A budgetary comparison schedule has been provided for the general fund to demonstrate compliance with the budget.

Notes to Financial Statements

The notes provide additional information that is essential to a full understanding of the data provided in the government-wide and fund financial statements.

Government-Wide Financial Analysis

Statement of Net Position

The District's net position was \$18,667,380 at September 30, 2019. The analysis that follows focuses on the net position of the District's governmental activities at September 30, 2019 and 2018.

Statement of Net Position

	2019	 2018
Assets, excluding capital assets	\$ 4,799,776	\$ 6,904,169
Capital Assets, net of depreciation	28,941,536	 28,539,944
Total assets	 33,741,312	 35,444,113
Liabilities, excluding long-term liabilities	692,766	603,776
Long-term Liabilities	14,381,166	 18,947,835
Total liabilities	 15,073,932	 19,551,611
Net Position:		
Net investment in capital assets	22,515,407	20,335,299
Restricted for debt service	1,236,190	1,871,683
Unrestricted	(5,084,217)	 (6,314,480)
Total net position	\$ 18,667,380	\$ 15,892,502

Changes in Net Position

The following is a summary of governmental activities for the fiscal years ended September 30, 2019 and 2018.

Changes in Net Position Year ended September 30,

	2019	2018
Revenues:		
Program revenues	\$ 5,498,257	\$ 10,835,151
General revenues, including special item	 4,845	 4,966,257
Total revenues	 5,503,102	15,801,408
Expenses:		
General government	175,624	159,716
Maintenance and operations	1,448,292	1,218,338
Culture and recreation	85,318	96,375
Roads and streets	76,712	76,712
Interest on long-term debt	 942,278	 1,225,170
Total expenses	 2,728,224	 2,776,311
Change in net position	2,774,878	13,025,097
Net position - beginning	 15,892,502	2,867,405
Net position - ending	\$ 18,667,380	\$ 15,892,502

As noted above and in the statement of activities, the cost of all governmental activities during the year ended September 30, 2019 was \$2,728,224. The majority of these costs are maintenance and operations along with interest on long-term debt.

Financial Analysis of the Government's Funds

The District uses fund accounting to ensure and demonstrate compliance with finance related legal requirements. The focus of the District's governmental funds is to provide information on near-term inflows, outflows and balances of spendable resources. Such information is useful in assessing the District's financing requirements. In particular, unassigned fund balance may serve as a useful measure of a government's net resources available for spending at the end of the fiscal year. At September 30, 2019, the District's governmental funds reported combined ending fund balances of \$4,450,951. Of this total, \$48,886 is nonspendable, \$4,308,806 is restricted and the remainder of \$93,259 is unassigned.

The fund balance of the general fund increased \$6,226. The debt services fund balance decreased \$1,018,943 due to payment of debt. The capital projects fund balance decreased \$1,286,453 due to funds spent for capital outlay.

General Fund Budgetary Highlights

An operating budget was adopted and maintained by the governing board for the District pursuant to the requirements of Florida Statutes. The budget to actual comparison for the general fund, including the original budget and final adopted budget, is shown on page 12. The budget is adopted using the same basis of accounting that is used in preparation of the fund financial statements. The legal level of budgetary control is at the fund level.

Capital Asset and Debt Administration

Capital Assets

At September 30, 2019, the District had \$28,941,536 invested in infrastructure. More detailed information about the District's capital assets is presented in the notes to financial statements.

Capital Debt

At September 30, 2019, the District had \$14,470,000 in bonds outstanding. More detailed information about the District's capital debt is presented in the notes to financial statements.

Requests for Information

If you have questions about this report or need additional financial information, contact *Belmont Community Development District's* Finance Department at 12750 Citrus Park Lane, Suite 115 Tampa FL, 33625.



	Governmental Activities
Assets:	
Cash	\$ 91,090
Due from developer	3,040
Prepaid costs	23,135
Accounts receivable	93,918
Deposits	25,751
Restricted assets:	
Temporarily restricted investments	4,562,842
Capital Assets:	
Capital assets not being depreciated	17,051,282
Capital assets being depreciated, net	11,890,254
Total assets	33,741,312
Liabilities:	
Accounts payable and accrued expenses	228,141
Accrued interest payable	343,941
Retainage payable	120,684
Noncurrent liabilities:	
Due within one year	240,000
Due in more than one year	14,141,166
Total liabilities	15,073,932
Net Position:	
Net investment in capital assets	22,515,407
Restricted for debt service	1,236,190
Unrestricted	(5,084,217)
Total net position	\$ 18,667,380

				1	Pro	gram Revenu	e		R	et (Expense) evenue and inges in Net Position
		_		Charges for		Operating and	Capit	and	Go	overnmental
Functions/Programs		Expenses		Services	_	Contributions	Conf	tributions		Activities
Governmental activities: General government Physical environment Culture and recreation Roads and streets Interest on long-term debt	\$	175,624 1,448,292 85,318 76,712 942,278	\$	87,197 719,070 42,360 38,087 4,584,441	\$	- - - - 19,145	\$	- - - - 7,957	\$	(88,427) (729,222) (42,958) (38,625) 3,669,265
Total governmental activities	\$	2,728,224	\$	5,471,155	\$	19,145	\$	7,957		2,770,033
General Revenues: Investment income Miscellaneous										16 4,829
			Total general revenues and special item							4,845
			Change in net position							2,774,878
				Net Posit	tion	- beginning				15,892,502
				Net Posi	itio	n - ending			\$	18,667,380

		General		Debt Service		Capital Projects	 Total Governmental Funds
Assets: Cash Investments Due from developer Other receivables Prepaid costs Deposits	\$	86,931 - - 93,918 23,135 25,751	\$	2,501,302 3,040 - -	\$	4,159 2,061,540 - - - -	\$ 91,090 4,562,842 3,040 93,918 23,135 25,751
Total assets	\$	229,735	\$	2,504,342	\$	2,065,699	\$ 4,799,776
Liabilities and Fund Balances: Liabilities: Accounts payable and accrued expenses Retainage payable	\$	87,590 -	\$	-	\$	140,551 120,684	\$ 228,141 120,684
Total liabilities		87,590		-		261,235	 348,825
Fund balances: Nonspendable-prepaid costs and deposits Restricted for: Debt service Capital projects Unassigned		48,886 - - 93,259		- 2,504,342 - -		- 1,804,464 -	48,886 2,504,342 1,804,464 93,259
Total fund balances		142,145		2,504,342		1,804,464	4,450,951
Total liabilities and fund balances	\$	229,735	\$	2,504,342	\$	2,065,699	
Amounts reported for governmental activities in	==== n the s	tatement of	=== net	position are o	diffe	ent because:	
Capital assets used in governmental activities are in the funds.							\$ 28,941,536
Accrued into Bonds paya	•	ayable		(343,941) (14,381,166)			(14,725,107)
Net Position of Governmental Activities							\$ 18,667,380

Year Ended September 30, 2019

_		General	De	ebt Service		Capital Projects		Total Governmental Funds
Revenues:	•	COC E44	ф	4 400 007	Φ		Φ	4 000 200
Assessment revenue Special assessments - prepayments	\$	696,511	\$	1,132,887 3,451,554	\$	-	\$	1,829,398 3,451,554
Developer contributions		190,203		-		- -		190,203
Investment and miscellaneous income		4,845		19,145		7,957		31,947
Total revenues		891,559		4,603,586		7,957		5,503,102
Expenditures:								
Current:								
General government		175,624		-		-		175,624
Maintenance and operations		624,391		-		-		624,391
Culture and recreation		85,318		-		-		85,318
Debt Service:								
Interest		-		1,044,734		-		1,044,734
Principal		=		4,570,000		1 202 205		4,570,000
Capital outlay		-				1,302,205		1,302,205
Total expenditures		885,333		5,614,734		1,302,205		7,802,272
Deficit of Revenues Over								
Expenditures		6,226		(1,011,148)		(1,294,248)		(2,299,170)
Other Financing Sources (Uses) :								
Transfers in		_		_		7,795		7,795
Transfers out		_		(7,795)		7,700		(7,795)
				· · · · · · · · · · · · · · · · · · ·				(,
Total other financing sources (uses)		-		(7,795)		7,795		
Net change in fund balances		6,226		(1,018,943)		(1,286,453)		(2,299,170)
Fund Balances, beginning of year		135,919		3,523,285		3,090,917		6,750,121
Fund Balances, end of year	\$	142,145	\$	2,504,342	\$	1,804,464	\$	4,450,951

Belmont Community Development District Reconciliation of the Statement of Revenues, Expenditures and Changes in Fund Balances of Governmental Funds to the Statement of Activities

Year Ended September 30, 2019

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

Net Change in Fund Balances - total governmental funds (page 10)

\$ (2,299,170)

Governmental funds report capital outlays as expenditures because such outlays use current financial resources; however, in the statement of net position the cost of those assets is recorded as capital assets.

Depreciation of capital assets is not recognized in the governmental fund statement but is reported as an expense in the statement of activity.

Capital outlay
Depreciation expense

1,303,762 (902,170)

401,592

Repayments of long-term liabilities are reported as expenditures in governmental funds, while repayments reduce long-term liabilities in the statement of net position.

Payment of bonds payable

4,570,000

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

Change in accrued interest Amortization of bond discount 105,787

(3,331)

102,456

Change in Net Position of Governmental Activities (page 8)

\$ 2,774,878

Belmont Community Development District Statement of Revenues, Expenditures and Changes in Fund Balance Budget and Actual **General Fund**

Year Ended September 30, 2019

	 Budgeted	Amou	ınts	Actu	ual Amounts	/ariance with Final Budget Positive (Negative)
	 Original		Final			
Revenues:						
Assessment revenue	\$ 598,291	\$	598,291	\$	696,511	\$ 98,220
Developer contributions	382,381		382,381		190,203	(192,178)
Investment and miscellaneous	 -				4,845	 4,845
Total revenues	980,672		980,672		891,559	 (89,113)
Expenditures:						
Current:						
General government	145,571		145,571		175,624	(30,053)
Maintenance and operations	629,425		629,425		624,391	5,034
Culture and recreation	 205,676		205,676		85,318	 120,358
Total expenditures	980,672		980,672		885,333	95,339
Net change in fund balance	_		_		6,226	6,226
Fund balance, beginning	135,919		135,919		135,919	-, -
	 		· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	 0.000
Fund balance, ending	\$ 135,919	\$	135,919	\$	142,145	\$ 6,226



NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Reporting Entity

Belmont Community Development District, (the "District") was established on February 10, 2006 by Hillsborough County Ordinance 06-4 pursuant to the Uniform Community Development District Act of 1980, otherwise known as Chapter 190, Florida Statutes. The Act provides, among other things, the power to manage basic services for community development, the power to borrow money and issue bonds, and the power to levy and assess non-ad valorem assessments for the financing and delivery of capital infrastructure. The District was established for the purpose of financing and managing the acquisition, construction, maintenance and operation of a portion of the infrastructure necessary for community development within the District.

The District is governed by the Board of Supervisors (the "Board"), which is composed of five members. The Supervisors are elected on an at large basis by qualified electors that reside within the District. Four of the supervisors are elected by landowners within the District. The Board of Supervisors of the District exercises all powers granted to the District pursuant to Chapter 190, Florida Statutes. The District was originally developed by Belmont, LLC ("Original Developer"). In February 2010, the Original Developer conveyed, by quit claim deed, property owned within the District to Belmont Land Acquisition, LLC. In March 2010, the land was subsequently conveyed, by quit claim deed, to Belmont Real Estate, LLC (the "Developer").

The Board has final responsibility for:

- 1. Allocating and levying assessments.
- 2. Approving budgets.
- 3. Exercising control over facilities and properties.
- Controlling the use of funds generated by the District.
- 5. Approving the hiring and firing of key personnel.
- 6. Financing improvements.

The financial statements were prepared in accordance with Governmental Accounting Standards Board ("GASB") Statements 14, 39, and 61. Under the provisions of those standards, the financial reporting entity consists of the primary government, organizations for which the District Board of Supervisors is considered to be financially accountable, and other organizations for which the nature and significance of their relationship with the District are such that, if excluded, the financial statements of the District would be considered incomplete or misleading. There are no entities considered to be component units of the District; therefore, the financial statements include only the operations of the District.

Government-Wide and Fund Financial Statements

The financial statements include both government-wide and fund financial statements.

The government-wide financial statements (i.e., the statement of net position and the statement of activities) report information on all of the non-fiduciary activities of the primary government. For the most part, the effect of interfund activity has been removed from these statements.

The statement of activities demonstrates the degree to which the direct expenses of a given function or segment are offset by program revenues. *Direct expenses* are those that are clearly identifiable with a specific function or segment. *Program revenues* include 1) charges to customers who purchase, use, or directly benefit from goods, services, or privileges provided by a given function or segment, 2) grants, contributions and investment earnings that are restricted to meeting the operational or capital requirements of a particular function or segment and 3) operating-type special assessments that are treated as charges for services (including assessments for maintenance and debt service). Other items not included among program revenues are reported instead as *general revenues*.

Measurement Focus, Basis of Accounting and Financial Statement Presentation

The government-wide financial statements are reported using the *economic resources measurement* focus and the *accrual basis of accounting*. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows. Assessments are recognized as revenues in the year for which they are levied. Grants and similar items are recognized as revenues as soon as all eligibility requirements imposed by the provider have been met.

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Governmental fund financial statements are reported using the *current financial resources measurement focus* and the modified *accrual basis of accounting*. Revenues are recognized as soon as they are both measurable and available. Revenues are considered to be *available* when they are collectible within the current period or soon enough 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, except for Developer receivables, which are collected from the Developer when the amount is due. Expenditures are recorded when a liability is incurred, as under accrual accounting. However, debt service expenditures are recorded only when payment is due.

Assessments, including debt service assessments and operation and maintenance assessments, are non-ad valorem assessments imposed on lands located within the District and benefited by the District's activities. Operation and maintenance special assessments are levied by the District prior to the start of the fiscal year which begins October 1st and ends on September 30th. These assessments are imposed upon all benefited lands located in the District. Debt service special assessments are imposed upon certain lots and lands as described in each resolution imposing the special assessment for each series of bonds issued by the District. Certain debt service assessments are collected upon the closing of those lots subject to short term debt and are used to prepay a portion of the bonds outstanding.

Assessments and interest associated with the current fiscal period are all considered to be susceptible to accrual and so have been recognized as revenues of the current fiscal period. Only the portion of assessments receivable due within the current fiscal period are considered to be susceptible to accrual as revenue of the current period. All other revenue items are considered to be measurable and available only when cash is received by the District.

The District reports the following major governmental funds:

General Fund

Is the District's primary operating fund. It is used to account for and report all financial resources not accounted for and reported in another fund.

Debt Service Fund

Accounts for the accumulation of resources for the annual payment of principal and interest on long-term debt.

Capital Projects Fund

Accounts for the financial resources to be used for the acquisition or construction of major infrastructure within the District financed with the Bonds.

As a general rule, the effect of interfund activity has been eliminated from the government-wide financial statements. When both restricted and unrestricted resources are available for use, it is the District's policy to use restricted resources first, then unrestricted resources as they are needed.

Assets, Liabilities, Deferred Outflows/Inflows of Resources and Net Position/Fund Balance

Restricted Assets

These assets represent cash and investments set aside pursuant to bond covenants.

Deposits and Investments

The District's cash and cash equivalents are considered to be cash on hand and demand deposits.

Investments of the District are reported at fair value and are categorized within the fair value hierarchy established in accordance with GASB Statement No. 72, Fair Value Measurement and Application. The District's investments consist of investments authorized in accordance with Section 218.415, Florida Statutes.

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Receivables

Accounts receivable and assessments receivable are shown net of an allowance for uncollectible accounts.

Prepaid Items

Certain payments to vendors reflect costs applicable to future accounting periods and are recorded as prepaid items in both government-wide and fund financial statements.

Capital Assets

Capital assets, which include property, plant, equipment and infrastructure assets (e.g., roads, sidewalks and similar items), are reported in the applicable governmental activities column in the government-wide financial statements. Capital assets are defined by the District as assets with an initial, individual cost of more than \$5,000 and an estimated useful life in excess of two years. Such assets are recorded at historical cost or estimated historical cost if purchased or constructed. Donated capital assets are recorded at acquisition value at the date of donation.

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

Capital assets of the District are depreciated using the straight-line method over the following estimated useful lives:

Assets	Years	
District Roads and Street Signs	30	
Water Management Control	25	
Security and Landscaping	15	
Recreational Facilities	30	
Sewer and Wastewater Management	25	
Water Supply	25	

Long Term Obligations

In the government-wide financial statements, long-term debt and other long-term obligations are reported as liabilities in the statement of net position. Bond premiums and discounts are deferred and amortized over the life of the bonds using the straight-line method. Bond issuance costs are reported as expenses. Bonds payable are reported net of premiums or discounts.

In the fund financial statements, governmental fund types recognize bond premiums and discounts, as well as bond issuance costs, during the current period. The face amount of debt issued is reported as other financing sources. Premiums received on debt issuances are reported as other financing sources while discounts on debt issuances are reported as other financing uses. Issuance costs, whether or not withheld from the actual debt proceeds received, are reported as expenditures.

Deferred Outflows/Inflows of Resources

In addition to assets, the statement of financial position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, *deferred outflows of resources*, represents a consumption of net position that applies to a future period(s) and so will not be recognized as an outflow of resources (expense/expenditure) until then. The District does not have any item that qualifies for reporting in this category for the year ended September 30, 2019.

In addition to liabilities, the statement of financial position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, *deferred inflows of resources*, represents an acquisition of net position that applies to a future period(s) and so will *not* be recognized as an inflow of resources (revenue) until that time. The District does not have any item that qualifies for reporting in this category for the year ended September 30, 2019.

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Net Position Flow Assumption

Sometimes the District will fund outlays for a particular purpose from both restricted and unrestricted resources. In order to calculate the amounts to report as restricted net position and unrestricted net position in the government-wide financial statements, a flow assumption must be made about the order in which the resources are considered to be applied. It is the District's policy to consider restricted net position to have been depleted before unrestricted net position is applied.

Fund Balance Flow Assumptions

Sometimes the District will fund outlays for a particular purpose from both restricted and unrestricted resources (total of committed, assigned, and unassigned fund balance). In order to calculate the amounts to report as restricted, committed, assigned, and unassigned fund balance in the governmental fund financial statements a flow assumption must be made about the order in which the resources are considered to be applied. It is the District's policy to consider restricted fund balance to have been depleted before using any of the components of unrestricted fund balance. Further, when the components of unrestricted fund balance can be used for the same purpose, committed fund balance is depleted first, followed by assigned fund balance. Unassigned fund balance is applied last.

Fund Balance Policies

Fund balance of governmental funds is reported in various categories based on the nature of any limitations requiring the use of resources for specific purposes. The District itself can establish limitations on the use of resources through either commitment (committed fund balance) or an assignment (assigned fund balance).

The committed fund balance classification includes fund balance amounts that can be used only for the specific purposes determined by a formal action of the government's highest level of decision-making authority. The Board of Supervisors is the highest level of decision-making authority for the government that can, by adoption of an ordinance or resolution prior to the end of the fiscal year, commit fund balance. Once adopted, the limitation imposed by the ordinance or resolution remains in place until a similar action is taken to remove or revise the limitation.

Amounts in the assigned fund balance classification are intended to be used by the government for specific purposes but do not meet the criteria to be classified as committed. The Board of Supervisors has authorized the District Manager to assign amounts for specific purposes. The Board of Supervisors may also assign fund balance as it does when appropriating fund balance to cover a gap between estimated revenue and appropriations in the subsequent year's appropriated budget. Unlike commitments, assignments generally only exist temporarily. In other words, an additional action does not normally have to be taken for the removal of an assignment. Conversely, as discussed above an additional action is essential to either remove or revise a commitment.

Other Disclosures

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates.

New Accounting Standards Issued

In fiscal year 2019, the District implemented Government Accounting Standards Board (GASB) Statement No. 88, Certain Disclosures Related to Debt, Including Direct Borrowings and Direct Placements. This statement requires additional note disclosures for certain debt issues. There was no effect on beginning balances of the District.

Additionally, the GASB has issued Statement No. 83, *Certain Asset Retirement Obligations* that is effective for this fiscal year. The District has reviewed this statement and determined that this pronouncement has no discernable impact on these financial statements

NOTE 2 STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY

Budgetary Information

The District is required to establish a budgetary system and an approved annual budget for the General Fund. Annual budgets are adopted on a basis consistent with accounting principles generally accepted in the United States of America. All annual appropriations lapse at the fiscal year end. The legal level of budgetary control is at the fund level. Any budget amendments that increase the aggregate budgeted appropriations, at the fund level, must be approved by the Board of Supervisors. The District follows these procedures in establishing the budgetary data reflected in the financial statements.

- 1. Each year the District Manager submits to the District Board a proposed operating budget for the fiscal year commencing the following October 1.
- 2. A public hearing is conducted to obtain comments.
- 3. Prior to October 1, the budget is legally adopted by the District Board.
- 4. All budget changes must be approved by the District Board.

NOTE 3 DEPOSITS AND INVESTMENTS

Deposits

The District's cash balances were entirely covered by federal depository insurance or by a collateral pool pledged to the State Treasurer. Florida Statutes Chapter 280, "Florida Security for Public Deposits Act", requires all qualified depositories to deposit with the Treasurer or another banking institution eligible collateral equal to various percentages of the average daily balance for each month of all public deposits in excess of any applicable deposit insurance held. The percentage of eligible collateral (generally, U.S. Governmental and agency securities, state or local government debt, or corporate bonds) to public deposits is dependent upon the depository's financial history and its compliance with Chapter 280. In the event of a failure of a qualified public depository, the remaining public depositories would be responsible for covering any resulting losses.

Investments

The District categorizes its fair value measurements within the fair value hierarchy 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.

Under GASB 72, assets or liabilities are classified into one of three levels. Level 1 is the most reliable and is based on quoted prices 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 uses the best information available under the circumstances, which includes the District's own data in measuring unobservable inputs.

The District has the following recurring fair value measurements as of September 30, 2019:

Money market mutual funds of \$570,277 are valued using Level 2 inputs.

Instead of establishing a written investment policy, the District elected to limit investments to those approved by Florida Statutes and the District Trust Indenture. Authorized District investments include, but are not limited to:

- 1. The Local Government Surplus Funds Trust Fund (SBA);
- Securities and Exchange Commission Registered Money Market Funds with the highest credit quality rating from a nationally recognized rating agency;
- 3. Interest-bearing time deposits or savings accounts in qualified public depositories;
- 4. Direct obligations of the U.S. Treasury.

NOTE 3 DEPOSITS AND INVESTMENTS (CONTINUED)

Investments made by the District at September 30, 2019 are summarized below. In accordance with GASB 31, investments are reported at fair value.

Investment Type	Fair Value	Credit Rating	Weighted Average Maturity
First American Treasury Obligation Fund, Class Z US Bank Money Market	\$ 570,277 3,992,565	AAAm N/A	26 Days N/A
	\$ 4,562,842		

Credit Risk:

For investments, credit risk is generally the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. Investments in U.S. Government securities and agencies must be backed by the full faith and credit of the United States Government. Short term bond funds shall be rated by a nationally recognized ratings agency and shall maintain the highest credit quality rating. Investment ratings by investment type are included in the preceding summary of investments.

Custodial Credit Risk:

In the case of deposits, this is the risk that, in the event of a bank failure, the District's deposits may not be returned to it. The District's investment policy requires that bank deposits be secured as provided by Chapter 280, Florida Statutes. This law requires local governments to deposit funds only in financial institutions designated as qualified public depositories by the Chief Financial Officer of the State of Florida, and creates the Public Deposits Trust Fund, a multiple financial institution pool with the ability to assess its member financial institutions for collateral shortfalls if a default or insolvency has occurred. At September 30, 2019, all of the District's bank deposits were in qualified public depositories.

For an investment, this is the risk that, in the event of the failure of the counterparty, the government will not be able to recover the value of its investments or collateral securities that are in the possession of an outside party. At September 30, 2019, none of the investments listed are exposed to custodial credit risk because their existence is not evidenced by securities that exist in physical or book entry form.

Concentration of Credit Risk:

The District places no limit on the amount the District may invest in any one issuer.

Interest Rate Risk:

The District does not have a formal policy that limits investment maturities as a means of managing exposure to fair value losses arising from increasing interest rates. The District manages its exposure to declines in fair values by investing primarily in pooled investments that have a weighted average maturity of less than three months.

NOTE 4 CAPITAL ASSETS

Capital asset activity for the year ended September 30, 2019 was as follows:

	Beginning Balance	Additions	Disposals	Ending Balance
Governmental Activities:				
Capital Assets Not Being Depreciated:		•	•	
Land	\$ 5,146,000	\$ -	\$ -	\$ 5,146,000
Improvements under construction	10,601,520	1,303,762		11,905,282
Total capital assets not being depreciated	15,747,520	1,303,762		17,051,282
Capital Assets Being Depreciated:				
District roads and street lights	2,301,348	-	-	2,301,348
Water management control	11,933,368	-	-	11,933,368
Security and landscaping	3,365,400	-	-	3,365,400
Recreation facilities	3,006,463	-	-	3,006,463
Sewer and wastewater management	299,608	-	-	299,608
Water supply	353,998			353,998
Total Capital Assets Being Depreciated	21,260,185			21,260,185
Less Accumulated Depreciation for:				
District roads and street lights	(351,667)	(76,712)	-	(428,379)
Water management control	(5,365,669)	(474,739)	-	(5,840,408)
Security and landscaping	(2,285,098)	(224,360)	-	(2,509,458)
Recreation facilities	(338,327)	(100,215)	-	(438,542)
Sewer and wastewater management	(76,260)	(11,984)	-	(88,244)
Water supply	(50,740)	(14,160)		(64,900)
Total Accumulated Depreciation	(8,467,761)	(902,170)		(9,369,931)
Total Capital Assets Being Depreciated, net	12,792,424	(902,170)		11,890,254
Governmental Activities Capital Assets, net	\$ 28,539,944	\$ 401,592	\$ -	\$ 28,941,536

Depreciation expense in the amount of \$825,458 was charged to maintenance and operations and \$76,712 was charged roads and streets.

In a prior fiscal year, the District amended its infrastructure improvement plan in conjunction with the issuance of the Series 2013A Bonds. The estimated cost of the Series 2013A project for Phase 1B and Phase 2C are approximately \$7,642,000, a portion of which will be financed by the Series 2013A Bonds. The remaining balance is expected to be funded by the Developer in accordance with Construction Funding Agreement executed in a prior fiscal year. Under the Agreement, the Developer agreed to advance certain funds to fund construction in anticipation of reimbursement from a future Bond issuance.

NOTE 5 LONG-TERM LIABILITIES

Series 2013 Capital Improvement Revenue Bonds

In March 2013, the District issued \$6,170,000 of Capital Improvement Revenue Bonds, Series 2013A with fixed interest rates ranging from 5.5% to 6.5%. The Bonds were issued to finance the acquisition and construction of certain improvements for the benefit of the District. Interest is to be paid semiannually on each May 1 and November 1, commencing on November 1, 2013. Principal on the Bonds is to be paid serially commencing November 1, 2014 through November 1, 2043.

The Series 2013A Bonds are not subject to optional redemption until on or after November 1, 2033. The Bonds are subject to extraordinary mandatory redemption prior to maturity in the manner determined by the Bond Registrar if certain events occurred as outlined in the Bond Indenture. In the event of default, all principal and interest of the Bonds may become immediately due and payable.

The Bond Indenture has certain restrictions and requirements relating principally to the use of proceeds to pay for the infrastructure improvements and the procedures to be followed by the District on assessments to property owners. The District agreed to levy special assessments in annual amounts adequate to provide payment of debt service. Payment of principal and interest on the 2013A Bonds is secured by a pledge of and a first lien upon the pledged special assessment revenue. The District is in compliance with the requirements of the Bond Indenture.

Total principal and interest remaining on the Series 2013A Revenue Bonds at September 30, 2019 is \$11,409,841. For the year ended September 30, 2019, principal and interest paid was \$461,981 and special assessment revenue pledged towards the payment of principal and interest on the bonds was \$480,819.

Series 2016A Capital Improvement Revenue Bonds

In May 2016, the District issued \$9,840,000 of Capital Improvement Revenue Bonds, Series 2016A with fixed interest rates ranging from 3.6% to 5.5%. The Bonds were issued to finance the acquisition and construction of certain improvements for the benefit of the District. Interest is to be paid semiannually on each May 1 and November 1, commencing on November 1, 2016. Principal on the Bonds is to be paid serially commencing November 1, 2016 through November 1, 2046.

The Series 2016A Bonds are not subject to optional redemption until on or after November 1, 2027. The Bonds are subject to extraordinary mandatory redemption prior to maturity in the manner determined by the Bond Registrar if certain events occurred as outlined in the Bond Indenture. In the event of default, all principal and interest of the Bonds may become immediately due and payable.

The Bond Indenture has certain restrictions and requirements relating principally to the use of proceeds to pay for the infrastructure improvements and the procedures to be followed by the District on assessments to property owners. The District agreed to levy special assessments in annual amounts adequate to provide payment of debt service. Payment of principal and interest on the 2016A Bonds is secured by a pledge of and a first lien upon the pledged special assessment revenue. The District is in compliance with the requirements of the Bond Indenture.

Series 2016B Capital Improvement Revenue Bonds

In May 2016, the District issued \$5,310,000 of Capital Improvement Revenue Bonds, Series 2016B with fixed interest rate of 5.6%. The Bonds were issued to finance the acquisition and construction of certain improvements for the benefit of the District. Interest is to be paid semiannually on each May 1 and November 1, commencing on November 1, 2016. The full principal is to be paid in lump sum on November 1, 2035. In the event of default, all principal and interest of the Bonds may become immediately due and payable.

The Series 2016B Bonds are not subject to optional redemption.

NOTE 5 LONG-TERM LIABILITIES (CONTINUED)

The Bond Indenture has certain restrictions and requirements relating principally to the use of proceeds to pay for the infrastructure improvements and the procedures to be followed by the District on assessments to property owners. The District agreed to levy special assessments in annual amounts adequate to provide payment of debt service. Payment of principal and interest on the 2016B Bonds is secured by a pledge of and a first lien upon the pledged special assessment revenue. The District is in compliance with the requirements of the Bond Indenture.

Total principal and interest remaining on both Series 2016A and Series 2016B Revenue Bonds at September 30, 2019 is \$16,909,627. For the year ended September 30, 2019, principal and interest of \$5,152,753 was paid and special assessment revenue pledged towards the payment of principal and interest on the bonds was \$4,103,622.

Bonds payable activity for the year ended September 30, 2019 was as follows:

	Beginning					[Due Within
	 Balance	Additions	Reductions	En	ding Balance		One Year
Governmental activities:							
Bonds Payable:							
Series 2013A	\$ 5,820,000	\$ -	\$ (100,000)	\$	5,720,000	\$	105,000
Series 2016A	7,910,000	-	(255,000)		7,655,000		135,000
Series 2016A discount	(92,165)	-	3,331		(88,834)		-
Series 2016B	 5,310,000		(4,215,000)		1,095,000		
Governmental activity							
long-term liabilities	\$ 18,947,835	\$ 	\$ (4,566,669)	\$	14,381,166	\$	240,000

At September 30, 2019, the scheduled debt service requirements on the bonds payable were as follows:

	Governmental Activities			
Year Ending September 30,		Principal		Interest
2020	\$	240,000	\$	820,122
2021		245,000		809,316
2022		260,000		797,238
2023		270,000		783,769
2024		290,000		769,531
2025 - 2029		1,660,000		3,595,469
2030 - 2034		2,205,000		3,055,403
2035 - 2039		3,980,000		2,102,070
2040 - 2044		3,910,000		1,000,775
2045 - 2047		1,410,000		115,775
	\$	14,470,000	\$	13,849,468

NOTE 6 RELATED PARTIES

Developer Transactions:

The Original Developer did not make payments on its assessments for the 2009 to 2012 fiscal years. In a previous year, the District filed a foreclosure suit for collection of the unpaid assessments. Subsequently, the parties to the foreclosure suit formally resolved their disputes. In a prior fiscal year, the District collected prior years' past due assessments of \$5,169,479. However, direct bill operation and maintenance assessments of \$283,723 and debt service assessments of \$1,681,825 for the fiscal years 2013 and 2014 were not paid. In the 2015 fiscal year, the District collected \$1,722,357 of the delinquent assessments.

The District did not receive assessment revenue from the Developer in the current year. Developer contributions totaled \$190,203.

Acquisition and Completion Agreements:

In March 2013, the District entered into an Acquisition Agreement with the Developer. In accordance with the Agreement, the Developer agrees to contribute funds, improvements, real property, and/or work product equaling or exceeding \$1,906,761 in lieu of Series 2013A Assessments on certain property owned by the Developer. As described in Note 4, the Developer conveyed land and improvements in 2016 which totaled \$6,545,000. Since this appraised value of property exceed the \$1,906,761 in the Agreement, the District approved a portion of excess contribution amount to be credited towards the payment of the 2013 outstanding assessments. Furthermore, the Developer entered into a Completion Agreement, whereby the Developer agrees to complete any portion of the project not financed by the Series 2013A Bond proceeds.

In May 2016, the District entered into an Acquisition Agreement with the Developer. In accordance with the Agreement, the Developer agrees to contribute funds, improvements, real property, and/or work product to avoid delay in the commencement of the development of the 2016 Project. The District has agreed to pay the Developer the cost of improvements from available proceeds for the 2016 Bonds.

Concentrations:

A major land owner provides approximately 17% of assessment revenues.

NOTE 7 MANAGEMENT COMPANY

The District has contracted with a management company to perform management services, which include financial and accounting services as well as clubhouse management services. Certain employees of the management company also serve as officers (Board appointed non-voting positions) of the District. Under the agreements, the District compensates the management company for management, accounting, financial reporting and other administrative costs.

NOTE 8 RISK MANAGEMENT

The District is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; and natural disasters. These risks are covered by commercial insurance from independent third parties. The District has not filed any claims under this commercial coverage during the last three years.

NOTE 8 SUBSEQUENT EVENTS

Subsequent to year end, the bond 2016B was completely paid off by the district.





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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

Belmont Community Development District

We have audited, in accordance with 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 the governmental activities, and each major fund of the *Belmont Community Development District* Community Development District (the "District") as of and for the year ended September 30, 2019, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated June 11, 2020.

Internal Control Over Financial Reporting

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

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 a 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 over financial reporting that might be material weaknesses or significant deficiencies. Given these limitations, during our audit, we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free from 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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

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.

McDirmit Davis

Orlando, Florida June 11, 2020





MANAGEMENT COMMENTS

Board of Supervisors
Belmont Community Development District

Report on the Financial Statements

We have audited the financial statements of the *Belmont Community Development District* (the "District") as of and for the fiscal year ended September 30, 2019, and have issued our report thereon dated June 11, 2020.

Auditor's Responsibility

We conducted our audit in accordance with auditing standards generally accepted in the United States of America; 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 Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards* and Independent Auditor'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 June 11, 2020, 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 annual financial audit report. There were no such findings in the preceding annual financial audit report.

Official Title and Legal Authority

Section 10.554(1)(i)4., Rules of the Auditor General, requires that the name or official title and legal authority for the primary government and each component unit of the reporting entity be disclosed in this management letter, unless disclosed in the notes to the financial statements. This information has been disclosed in the notes to the financial statements.

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 the District has met one or more of the conditions described in Section 218.503(1), Florida Statutes, and to identify the specific condition(s) met. In connection with our audit, we determined that the District did not meet any of the conditions described in Section 218.503(1), Florida Statutes.

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

Section 10.554(1)(i)2., Rules of the Auditor General, requires that we communicate 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 us to communicate 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 note any such findings.

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.

McDismit Davis

Orlando, Florida June 11, 2020





INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE WITH THE REQUIREMENTS OF SECTION 218.415, FLORIDA STATUTES

To the Board of Supervisors
Belmont Community Development District

We have examined *Belmont Community Development District*'s (the District) compliance with the requirements of Section 218.415, Florida Statutes, during the year ended September 30, 2019. Management is responsible for the District's compliance with those requirements. Our responsibility is to express an opinion on the 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 the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence about the 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 the District's compliance with specified requirements.

In our opinion, the District complied, in all material respects, with the aforementioned requirements for the year ended September 30, 2019.

McDirmit Davis

Orlando, Florida June 11, 2020