

**City Center
Community Development District**

ANNUAL FINANCIAL REPORT

September 30, 2021

City Center Community Development District

ANNUAL FINANCIAL REPORT

Fiscal Year Ended September 30, 2021

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Berger, Toombs, Elam, Gaines & Frank

Certified Public Accountants PL

600 Citrus Avenue
Suite 200
Fort Pierce, Florida 34950

772/461-6120 // 461-1155
FAX: 772/468-9278

REPORT OF INDEPENDENT AUDITORS

To the Board of Supervisors
City Center Community Development District
Polk County, Florida

Report on the Financial Statements

We have audited the accompanying financial statements of City Center Community Development District (the "District") as of and for the year ended September 30, 2021, and the related notes to 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

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 audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Accounting 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 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

To the Board of Supervisors
City Center Community Development District

Opinion

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 City Center Community Development District, as of September 30, 2021, and the respective changes in financial position and the budgetary comparison for the General Fund for the year then ended in conformity 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 Discussion and Analysis 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 February 3, 2023 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 City Center Community Development District's internal control over financial reporting and compliance.



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

February 3, 2023

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

Management's discussion and analysis of City Center Community Development District's (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 is reported in three categories; 1) net investment in capital assets 2) restricted and 3) 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 governmental 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.

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

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 statements* and the *fund financial statements* provide different pictures of the District. The *government-wide financial statements* provide an overall picture of the District's financial standing. These statements are comparable to private-sector companies and give a good understanding of the District's overall financial health and how the District paid for the various activities, or functions, provided by the District. All assets of the District, including capital assets, are reported in the **statement of net position**. All liabilities obligated but not paid by the District, are included. In the **statement of activities** transactions between the different functions of the District are eliminated in order to avoid "doubling up" the revenues and expenses. The *fund financial statements* provide a picture of the major funds of the District. In the case of governmental activities, outlays for long lived assets are reported as expenditures and long term liabilities are not included in the fund financial statements. To provide a link from the *fund financial statements* to the *government-wide financial statements*, a reconciliation is provided from the *fund financial statements* to the *government-wide financial statements*.

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 is also included in the *notes to financial statements*.

Financial Highlights

The following are the highlights of financial activity for the year ended September 30, 2017:

- The District's total liabilities exceeded total assets by \$3,223,584 (net position). Unrestricted net position for governmental activities was \$(8,352,903). Net investment in capital assets for governmental activities was \$10,961,487. Net position restricted for capital projects was \$615,000.
- Governmental activities revenues totaled \$405,400, while governmental activities expenses totaled \$1,104,071.

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Financial Analysis of the District

The following tables present condensed, government-wide current year and prior year data about net position and changes in net position. Comparative year data is shown based on the Government financial reporting model under the Governmental Accounting Standards Board Statement No. 34.

	Governmental Activities	
	2021	2020
Net Position		
Current assets	\$ 54,518	\$ 89,100
Restricted assets	454,677	451,876
Capital assets	23,121,487	23,248,168
Total Assets	<u>23,630,682</u>	<u>23,789,144</u>
Current liabilities	8,520,098	7,508,889
Non-current liabilities	11,887,000	12,360,000
Total Liabilities	<u>20,407,098</u>	<u>19,868,889</u>
Net position - net investment in capital assets	10,961,487	10,450,168
Net position - restricted for capital projects	615,000	615,000
Net position - unrestricted	(8,352,903)	(7,142,913)
Total Net Position	<u>\$ 3,223,584</u>	<u>\$ 3,922,255</u>

The decrease in current assets is related to the decrease cash in the current year.

The increase in current liabilities and the decrease in non-current liabilities is related to the increase in matured interest and matured bonds payable.

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

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.

	Governmental Activities	
	2021	2020
Change in Net Position		
Program Revenues		
Charges for services	\$ 404,952	\$ 373,343
General Revenues		
Investment earnings	20	12,181
Miscellaneous revenues	428	13,119
Total Revenues	<u>405,400</u>	<u>398,643</u>
Expenses		
General government	89,458	107,296
Physical environment	250,311	257,998
Interest and other charges	764,302	2,110,194
Total Expenses	<u>1,104,071</u>	<u>2,475,488</u>
Debt cancellation	-	5,265,000
Change in Net Position	(698,671)	3,188,155
Net Position – Beginning of Year	3,922,255	734,100
Net Position – End of Year	<u>\$ 3,223,584</u>	<u>\$ 3,922,255</u>

The increase in charges for services was related to the budgeted increase in special assessments.

The decrease in general government is related to the decrease in trustee fees in the current year.

The decrease in interest and other charges and debt cancellation is related to the debt cancellation in the prior year.

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Capital Assets Activity

The following schedule provides a summary of the District's capital assets as of 2021 and 2020:

Description	Governmental Activities	
	2021	2020
Construction in progress	\$ 21,691,768	\$ 21,691,768
Infrastructure	3,209,014	3,209,014
Less: Accumulated depreciation	(1,779,295)	(1,652,614)
Total Capital Assets, net	\$ 23,121,487	\$ 23,248,168

Depreciation of \$126,681 was recognized in the current year.

General Fund Budgetary Highlights

The budget exceeded actual expenditures primarily because capital improvements were less than anticipated.

The September 30, 2021 budget was not amended.

Debt Management

Governmental Activities debt includes the following:

- ◆ In April 2005, the District issued \$17,320,000 Special Assessment Revenue Bonds, Series 2005A. The bonds were issued to finance the costs of acquisition, construction, installation and equipping of certain assessable improvements within the District. The bonds were bifurcated in March 2015 into Series 2005A and Series 2015 (05A). The outstanding balance at that time, including matured bonds payable, was split into two series, \$12,595,000 and \$1,105,000. The balances outstanding at September 30, 2021 were \$4,675,000 and \$895,000, respectively.
- ◆ In May 2007, the District issued \$22,895,000 Special Assessment Revenue Bonds, Series 2007A. The bonds were issued to finance the costs of acquisition, construction, installation and equipping of certain assessable improvements within the District. The bonds were bifurcated in March 2015 into Series 2007A and Series 2015 (07A). The outstanding balance at that time, including matured bonds payable, was split into two series, \$15,060,000 and \$1,380,000. The balances outstanding at September 30, 2021 were \$5,635,000 and \$1,155,000, respectively.

**City Center Community Development District
MANAGEMENT'S DISCUSSION AND ANALYSIS
September 30, 2021**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Economic Factors and Next Year's Budget

Subsequent to year end, the Series 2005A and Series 2007A Bonds were cancelled at Bondholder direction and consent. The District cannot determine the affects this will have on the financial position or results of operations of the District in fiscal year 2022.

Request for Information

The financial report is designed to provide a general overview of City Center Community Development District's finances. Questions concerning any of the information provided in this report or requests for additional information should be addressed to the City Center Community Development District, Development Planning & Finance Group, 250 International Parkway, Suite 280, Lake Mary, Florida 32746.

City Center Community Development District
STATEMENT OF NET POSITION
September 30, 2021

	Governmental Activities
ASSETS	
Current Assets	
Cash	\$ 40,340
Due from other governments	420
Prepays	12,893
Deposits	865
Total Current Assets	54,518
Non-current Assets	
Restricted assets	
Investments	454,677
Capital assets, not being depreciated	
Construction in progress	21,691,768
Capital assets, being depreciated	
Infrastructure	3,209,014
Less: Accumulated depreciation	(1,779,295)
Total Non-current Assets	23,576,164
Total Assets	23,630,682
LIABILITIES	
Current Liabilities	
Accounts payable and accrued liabilities	5,339
Bonds payable, current portion	473,000
Accrued interest	311,901
Matured bonds payable	365,000
Matured interest payable	7,364,858
Total Current Liabilities	8,520,098
Non-current liabilities	
Bonds payable	11,887,000
Total Liabilities	20,407,098
NET POSITION	
Net investment in capital assets	10,961,487
Restricted for capital projects	615,000
Unrestricted	(8,352,903)
Total Net Position	\$ 3,223,584

See accompanying notes to financial statements.

City Center Community Development District
STATEMENT OF ACTIVITIES
For the Year Ended September 30, 2021

Functions/Programs	Expenses	Program Revenues Charges for Services	Net (Expense) Revenues and Changes in Net Position Governmental Activities
Primary government			
Governmental Activities			
General government	\$ (89,458)	\$ 84,408	\$ (5,050)
Physical environment	(250,311)	116,651	(133,660)
Interest and other costs	(764,302)	203,893	(560,409)
Total Governmental Activities	\$ (1,104,071)	\$ 404,952	(699,119)
 General Revenues			
Investment earnings			20
Miscellaneous revenues			428
Total General Revenues			448
Change in Net Position			(698,671)
Net Position - October 1, 2020			3,922,255
Net Position - September 30, 2021			\$ 3,223,584

See accompanying notes to financial statements.

City Center Community Development District
BALANCE SHEET -
GOVERNMENTAL FUNDS
September 30, 2021

	General	Debt Service	Capital Projects	Total Governmental Funds
ASSETS				
Cash	\$ 40,340	\$ -	\$ -	\$ 40,340
Due from other funds	-	-	615,000	615,000
Due from other governments	210	210	-	420
Prepaid expenses	12,893	-	-	12,893
Deposits	865	-	-	865
Restricted assets				
Investments, at fair value	-	454,677	-	454,677
Total Assets	<u>\$ 54,308</u>	<u>\$ 454,887</u>	<u>\$ 615,000</u>	<u>\$ 1,124,195</u>
LIABILITIES AND FUND BALANCES				
Liabilities				
Accounts payable and accrued liabilities	\$ 5,339	\$ -	\$ -	\$ 5,339
Due to other funds	-	615,000	-	615,000
Matured bonds payable	-	365,000	-	365,000
Matured interest payable	-	7,364,858	-	7,364,858
Total Liabilities	<u>5,339</u>	<u>8,344,858</u>	<u>-</u>	<u>8,350,197</u>
Fund Balances				
Nonspendable - deposits/prepays	13,758	-	-	13,758
Restricted for capital projects	-	-	615,000	615,000
Unassigned	35,211	(7,889,971)	-	(7,854,760)
Total Fund Balances	<u>48,969</u>	<u>(7,889,971)</u>	<u>615,000</u>	<u>(7,226,002)</u>
Total Liabilities and Fund Balances	<u>\$ 54,308</u>	<u>\$ 454,887</u>	<u>\$ 615,000</u>	<u>\$ 1,124,195</u>

City Center Community Development District
RECONCILIATION OF TOTAL GOVERNMENTAL FUND BALANCES
TO NET POSITION OF GOVERNMENTAL ACTIVITIES
September 30, 2021

Total Governmental Fund Balances	\$ (7,226,002)
Amounts reported for governmental activities in the Statement of Net Position are different because:	
Capital assets not being depreciated, infrastructure under construction, \$21,691,768, used in governmental activities are not financial resources and are therefore not reported at the fund level.	21,691,768
Capital assets being depreciated, infrastructure, \$3,209,014, net of accumulated depreciation, \$(1,779,295), are not current financial resources and are therefore not reported at the fund level.	1,429,719
Long-term liabilities, including bonds payable are not due and payable in the current period, and are not reported in the fund level statements.	(12,360,000)
Accrued interest expense for long-term debt is not a current financial use, and therefore is not reported at the fund level.	<u>(311,901)</u>
Net Position of Governmental Activities	<u><u>\$ 3,223,584</u></u>

See accompanying notes to financial statements.

City Center Community Development District
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES
IN FUND BALANCES - GOVERNMENTAL FUNDS
For the Year Ended September 30, 2021

	General	Debt Service	Capital Projects	Total Governmental Funds
Revenues				
Special assessments	\$ 201,059	\$ 203,893	\$ -	\$ 404,952
Investment earnings	-	20	-	20
Miscellaneous revenues	209	219	-	428
Total Revenues	<u>201,268</u>	<u>204,132</u>	<u>-</u>	<u>405,400</u>
Expenditures				
Current				
General government	89,458	-	-	89,458
Physical environment	123,630	-	-	123,630
Debt service				
Principal	-	438,000	-	438,000
Interest	-	775,118	-	775,118
Other debt service costs	-	429	-	429
Total Expenditures	<u>213,088</u>	<u>1,213,547</u>	<u>-</u>	<u>1,426,635</u>
Total revenues over/(under) total expenditures	<u>(11,820)</u>	<u>(1,009,415)</u>	<u>-</u>	<u>(1,021,235)</u>
Total Other Financing Sources/(Uses)				
Transfers in	-	210	-	210
Transfers out	(210)	-	-	(210)
Total Other Financing Sources/(Uses)	<u>(210)</u>	<u>210</u>	<u>-</u>	<u>-</u>
Net Change in Fund Balances	(12,030)	(1,009,205)	-	(1,021,235)
Fund Balances - October 1, 2020	<u>60,999</u>	<u>(6,880,766)</u>	<u>615,000</u>	<u>(6,204,767)</u>
Fund Balances - September 30, 2021	<u>\$ 48,969</u>	<u>\$ (7,889,971)</u>	<u>\$ 615,000</u>	<u>\$ (7,226,002)</u>

See accompanying notes to financial statements.

City Center 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, 2021

Net Change in Fund Balances - Total Governmental Funds	\$ (1,021,235)
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 of depreciation in the current year.	(126,681)
Repayments of bond principal are expenditures in the governmental funds, but the repayment reduces long-term liabilities in the Statement of Net Position.	438,000
In the Statement of Activities, interest is accrued on outstanding bonds; whereas in governmental funds, interest expenditures are reported when due. This is the net change in accrued interest in the current period.	<u>11,245</u>
Change in Net Position of Governmental Activities	<u><u>\$ (698,671)</u></u>

See accompanying notes to financial statements.

City Center Community Development District
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN
FUND BALANCES - BUDGET AND ACTUAL - GENERAL FUND
For the Year Ended September 30, 2021

	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>	Variance with Final Budget Positive (Negative)
Revenues				
Special assessments	\$ 251,065	\$ 251,065	\$ 201,059	\$ (50,006)
Miscellaneous revenues	-	-	209	209
Total Revenues	<u>251,065</u>	<u>251,065</u>	<u>201,268</u>	<u>(49,797)</u>
Expenditures				
Current				
General government	113,137	113,137	89,458	23,679
Physical environment	132,220	132,220	123,630	8,590
Capital outlay	55,708	55,708	-	55,708
Total Expenditures	<u>301,065</u>	<u>301,065</u>	<u>213,088</u>	<u>87,977</u>
Total revenues over/(under) total expenditures	(50,000)	(50,000)	(11,820)	38,180
Total Other Financing Sources/(Uses)				
Transfers out	-	-	(210)	(210)
Net Change in Fund Balances	(50,000)	(50,000)	(12,030)	37,970
Fund Balances - October 1, 2020	<u>170,074</u>	<u>170,074</u>	<u>60,999</u>	<u>(109,075)</u>
Fund Balances - September 30, 2021	<u><u>\$ 120,074</u></u>	<u><u>\$ 120,074</u></u>	<u><u>\$ 48,969</u></u>	<u><u>\$ (71,105)</u></u>

See accompanying notes to financial statements.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The financial statements of the District have been prepared in conformity with generally accepted accounting principles (GAAP). 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 January 8, 2003, by the Polk County Board of Commissioners ordinance No. 03-01, pursuant to the Rule 42RR-1, Florida Administrative Code 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 without the boundaries of the City Center Community Development District. The District is governed by a five-member Board of Supervisors who are elected for four year terms. The District operates within the criteria established by Chapter 190, Florida Statutes.

As required by GAAP, these financial statements present the City Center 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 includes, but is 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 by the Governmental Accounting Standards Board Statement Number 61, the Financial Reporting Entity, the District has not identified any component units.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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 primarily supported by special assessments and contributions. 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 an other financial 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.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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 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 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.

Fund Balance Spending Hierarchy – For all governmental funds except special revenue funds, when restricted, committed, assigned, and unassigned fund balances are combined in a fund, qualified expenditures are paid first from restricted or committed fund balance, as appropriate, then assigned and finally unassigned fund balances.

Expenditures generally are recorded when a liability is incurred, as under accrual accounting.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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 financial 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 current financial resource 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 an 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 the 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 the construction of certain infrastructure improvements.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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.

Cash equivalents include time deposits, certificates of deposit and all highly liquid debt instruments with original maturities of three months or less and held in a qualified public depository as defined by Chapter 280.02, Florida Statutes.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

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

b. Restricted Assets

Certain assets of the District are 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. In a fund with both restricted and unrestricted assets, qualified expenses are considered to be paid first from restricted net position and then from unrestricted net position.

c. Capital Assets

Capital assets, which include construction in progress and infrastructure, 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 one year. 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	25-40 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 and debt service funds. The legal level of budgetary control is at the fund level. All budgeted appropriations lapse at year end.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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, \$(7,226,002), differs from “net position” of governmental activities, \$3,223,584, 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 (land and improvements and construction in progress 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	\$ 21,691,768
Infrastructure	3,209,014
Less: accumulated depreciation	<u>(1,779,295)</u>
Total	<u>\$ 23,121,487</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 (both current and long-term) are reported in the Statement of Net Position.

Bonds payable	<u>\$ (12,360,000)</u>
---------------	------------------------

Accrued interest

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

Accrued interest	<u>\$ (311,901)</u>
------------------	---------------------

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

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, \$(1,021,235), differs from the “change in net position” for governmental activities, \$(698,671), 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. As a result, fund balances decrease by the amount of financial resources expended, whereas net position decrease by the amount of depreciation charged for the year.

Depreciation	\$ <u>(126,681)</u>
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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.

Principal payments	\$ <u>438,000</u>
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Accrued interest

Accrued liabilities in the statement of net position differ from the amount reported in governmental funds due to accrued interest on bonds.

Net change in accrued interest payable	\$ <u>11,245</u>
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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 does not have a formal deposit policy for custodial credit risk; however, they follow the provisions of Chapter 280, Florida Statutes regarding deposits and investments. As of September 30, 2021, the District's bank balance was \$43,656 and the carrying value was \$40,340. Exposure to custodial credit risk was as follows.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE C – CASH AND INVESTMENTS (CONTINUED)

Custodial Credit Risk – Deposits (Continued)

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, 2021, the District had the following investments:

<u>Investment</u>	<u>Maturities</u>	<u>Fair Value</u>
First American Government Obligations Fund	14 days *	\$ 335,383
U S Bank Money Market	N/A	119,294
Total		<u>\$ 454,677</u>

* Weighted Average Maturity

Custodial Credit Risk – Deposits (Continued)

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 uses 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 listed above are Level 1 assets.

Investments

The District's investment policy allows management to invest funds in investments permitted under Section 218.415, Florida Statutes and bond covenants.

Interest Rate Risk

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE C – CASH AND INVESTMENTS (CONTINUED)

Credit Risk

The District's investments in treasury funds, commercial paper, and government loans are limited by state statutory requirements and bond compliance. The District has no investment policy that would further limit its investment choices. As of September 30, 2021, the District's investment in First American Government Obligation Fund was rated AAAM by Standard & Poor's.

Concentration of Credit Risk

The District places no limit on the amount it may invest in any one fund. The investments in First American Government Obligations Fund are 74% of the District's total investments. The investments in U S Bank Money Market are 26% of the District's total investments.

The types of deposits and investments and their level of risk exposure as of September 30, 2021 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, 2021 was as follows:

	Balance October 1, 2020	Additions	Deletions	Balance September 30, 2021
Governmental Activities:				
Capital assets, not being depreciated				
Construction in progress	\$ 21,691,768	\$ -	\$ -	\$ 21,691,768
Capital assets, being depreciated				
Infrastructure	3,209,014	-	-	3,209,014
Less accumulated depreciation	(1,652,614)	(126,681)	-	(1,779,295)
Total capital assets depreciated, net	1,556,400	(126,681)	-	1,429,719
Governmental Activities Capital Assets	<u>\$ 23,248,168</u>	<u>\$ (126,681)</u>	<u>\$ -</u>	<u>\$ 23,121,487</u>

Depreciation of \$126,681 was charged to physical environment.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE E – LONG-TERM DEBT

The following is a summary of activity in the long-term debt of the District for the year ended September 30, 2021:

Long-term debt at October 1, 2020	\$ 12,798,000
Principal payments	<u>(438,000)</u>
Bonds payable, September 30, 2021	<u>\$ 12,360,000</u>

Special Assessment Revenue Bonds

On March 1, 2015, the Series 2005 and Series 2007 Special Assessment Revenue Bonds were bifurcated into Series 2005A, 2007A, 2015-05A and 2015-07A.

Series 2005A Special Assessment Revenue Bonds, \$12,595,000, due in annual principal installments beginning May 2015. Interest at a rate of 6.125% is due May 1, and November 1, beginning May 2015. Bond 2005A is a nonperforming bond.	\$ 4,675,000
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Series 2007A Special Assessment Revenue Bonds, \$15,060,000, due in annual principal installments beginning May 2015. Interest at a rate of 6.000% is due May 1, and November 1, beginning May 2015. Bond 2007A is a nonperforming bond.	5,635,000
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Series 2015-05A Special Assessment Revenue Bonds, \$1,105,000, due in annual principal installments beginning May 2015. Interest at a rate of 6.125% is due May 1, and November 1, beginning May 2015.	895,000
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Series 2015-07A Special Assessment Revenue Bonds, \$1,380,000, due in annual principal installments beginning May 2015. Interest at a rate of 6.000% is due May 1, and November 1, beginning May 2015.	<u>1,155,000</u>
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Bonds payable	<u>\$ 12,360,000</u>
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City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE E – LONG-TERM DEBT (CONTINUED)

The annual requirements to amortize the principal and interest of bonded debt outstanding as of September 30, 2021 are as follows:

Year Ending September 30,	Principal	Interest	Total
2022	\$ 473,000	\$ 748,563	\$ 1,221,563
2023	503,000	719,891	1,222,891
2024	534,000	689,399	1,223,399
2025	563,000	657,030	1,220,030
2026	599,000	622,900	1,221,900
2027-2031	3,603,000	2,521,614	6,124,614
2032-2036	4,881,000	1,285,634	6,166,634
2037-2038	1,204,000	109,440	1,313,440
Totals	<u>\$ 12,360,000</u>	<u>\$ 7,354,471</u>	<u>\$ 19,714,471</u>

Summary of Significant Bonds Resolution Terms and Covenants

Special Assessment Revenue Bonds, Series 2005A, 2007A, 2015(05A), and 2015(07A)

Depository Funds – The bond indentures 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 Series 2005A, 2007A, 2015(05A) and 2015(07A) Reserve Accounts are funded from the proceeds of the Series 2005 Bonds and the Series 2007 Bonds. The indenture amendments relating to the Bond bifurcation establish a \$50,000 reserve requirement in each of the four reserve accounts. Monies held in the reserve accounts will be used only for the purposes established in the Trust Indenture. The debt service reserve requirements for three of the four accounts were not met at September 30, 2021.

	Reserve Balance	Reserve Requirement
Series 2005A Special Assessment Revenue Bond	\$ 51,833	\$ 50,000
Series 2007A Special Assessment Revenue Bond	\$ 44,806	\$ 50,000
Series 2015(05A) Special Assessment Revenue Bond	\$ 50,000	\$ 50,000
Series 2015(07A) Special Assessment Revenue Bond	\$ 50,000	\$ 50,000

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. These risks are covered by commercial insurance from independent third parties. There were no claims or settled claims from these risks for each of the past three years.

City Center Community Development District
NOTES TO THE FINANCIAL STATEMENTS
September 30, 2021

NOTE G – INTERFUND BALNCES

Interfund balances at September 30, 2021 were as follows:

<u>Receivable Fund</u>	<u>Payable Fund</u>
Capital Projects Fund	Debt Service Fund
	<u>\$ 615,000</u>

At September 30, 2021, the Debt Service Fund owed the Capital Projects Fund for a payment made by the Capital Projects Fund of matured bonds payable related to the Debt Service Fund.

NOTE H – SUBSEQUENT EVENT

Subsequent to year end, the remaining Series 2005A and 2007A bonds were cancelled at Bondholder direction and consent.



Berger, Toombs, Elam, Gaines & Frank

Certified Public Accountants PL

600 Citrus Avenue
Suite 200
Fort Pierce, Florida 34950

772/461-6120 // 461-1155
FAX: 772/468-9278

INDEPENDENT AUDITORS' 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
City Center Community Development District
Polk County, 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 City Center Community Development District, as of and for the year ended September 30, 2021, and the related notes to the financial statements, and have issued our report thereon dated February 3, 2023.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered City Center Community Development District's internal control over financial reporting (internal control) as a basis for designing 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 City Center Community Development District's internal control. Accordingly, we do not express an opinion on the effectiveness of City Center Community Development 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 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 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.

To the Board of Supervisors
City Center Community Development District
Polk County, Florida

Compliance and Other Matters

As part of obtaining reasonable assurance about whether City Center 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 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.



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

February 3, 2023



Berger, Toombs, Elam, Gaines & Frank

Certified Public Accountants PL

600 Citrus Avenue
Suite 200
Fort Pierce, Florida 34950

772/461-6120 // 461-1155
FAX: 772/468-9278

MANAGEMENT LETTER

To the Board of Supervisors
City Center Community Development District
Polk County, Florida

Report on the Financial Statements

We have audited the financial statements of the City Center Community Development District as of and for the year ended September 30, 2021, and have issued our report thereon dated February 3, 2023.

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 Florida 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 our Independent Auditor's Report on an examination conducted in accordance with *AICPA Professionals Standards*, AT-C Section 315 regarding compliance requirements in accordance with Chapter 10.550, Rules of the Auditor General. Disclosures in that report, which is dated February 3, 2023, 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 following findings or recommendations were made in the preceding financial audit report.

FINDING 2015-02, 2014-02, 2013-02, 2012-02

Observation: The District has a net position deficit and a net governmental funds fund balance deficit.

Recommendation: The District should utilize all available remedies to alleviate the deficit.

Management response: The net position deficit has been remedied and the cancellation of debt subsequent to year end should remedy the deficit fund balance.

To the Board of Supervisors
City Center Community Development District

Financial Condition and Management

Section 10.554(1)(i)5.a. and 10.556(7), Rules of the Auditor General, requires that we apply appropriate procedures and communicate the results of our determination as to whether or not City Center Community Development District has met one or more of the conditions described in Section 218.503(1), Florida Statutes, and to identify of the specific conditions met. In connection with our audit, we determined that the City Center Community Development 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 conditions assessment procedures as of September 30, 2021 for City Center Community Development District. It is management's responsibility to monitor the City Center 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 communicate any recommendations to improve financial management. In connection with our audit, we did not have any such recommendations.

Specific Information

The information provided below was provided by management and has not been audited; therefore, we do not express an opinion or provide any assurance on the information.

As required by Section 218.39(3)(c), Florida Statutes, and Section 10.554(1)(i)6, Rules of the Auditor General, the City Center Community Development District reported:

- 1) The total number of district employees compensated in the last pay period of the District's fiscal year: The District did not have any employees.
- 2) The total number of independent contractors to whom nonemployee compensation was paid in the last month of the District's fiscal year: 0
- 3) All compensation earned by or awarded to employees, whether paid or accrued, regardless of contingency: N/A
- 4) All compensation earned by or awarded to nonemployee independent contractors, whether paid or accrued, regardless of contingency: N/A
- 5) Each construction project with a total cost of at least \$65,000 approved by the District that is scheduled to begin on or after October 1, 2020, together with the total expenditures for such project: The District had no construction projects during the year.
- 6) A budget variance based on the budget adopted under Section 189.016(4), Florida Statutes, before the beginning of the fiscal year being reported if the District amends a final adopted budget under Section 189.016(6), Florida Statutes: The budget was not amended.

To the Board of Supervisors
City Center Community Development District

As required by Section 218.39(3)(c), Florida Statutes, and Section 10.554(1)(i)8, Rules of the Auditor General, the City Center Community Development District reported:

- 7) The rate or rates of non-ad valorem special assessments imposed by the District: \$3,277.07 - \$61,284.10 for the General Fund and \$216,086.59 for the Debt Service Fund.
- 8) The amount of special assessments collected by or on behalf of the District: Total special assessments collected was \$404,952.
- 9) The total amount of outstanding bonds issued by the District and the terms of such bonds: Series 2005A, \$4,675,000, matures May 2036, Series 2007A, \$5,635,000 matures May 2038, Series 2015-05A, matures May 2036, \$895,000 and Series 2015-07A, \$1,155,000, matures May 2038.

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.

*Berger Toombs Elam
Gaines + Frank*

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

February 3, 2023



**Berger, Toombs, Elam,
Gaines & Frank**

Certified Public Accountants PL

600 Citrus Avenue
Suite 200
Fort Pierce, Florida 34950

772/461-6120 // 461-1155
FAX: 772/468-9278

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

To the Board of Supervisors
City Center Community Development District
Polk County, Florida

We have examined City Center Community Development District's compliance with Section 218.415, Florida Statutes during the year ended September 30, 2021. Management is responsible for City Center Community Development District's compliance with those requirements. Our responsibility is to express an opinion on City Center 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 City Center 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 City Center Community Development District's compliance with the specified requirements.

In our opinion, City Center Community Development District complied, in all material respects, with the aforementioned requirements during the year ended September 30, 2021.

*Berger Toombs Elam
Gaines + Frank*

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

February 3, 2023