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June 22, 2026

VIA E-MAIL ONLY

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Re: Marion County Development Review Committee Meeting Agenda – June 22, 2026  
Golden Ocala – WEC Multi-Use Fields Phase 1

Gentlemen:

As you know, my firm has the pleasure of representing Horse Farms Forever, Inc., a Florida not-for-profit corporation (“Horse Farms Forever”). As is our customary practice, we monitor the meeting agendas for the Development Review Committee (“DRC”).

Two days ago, we became aware of the two agenda items for Golden Ocala – WEC Multi-Use Fields Phase 1, Agenda Item Nos. 5.4 and 6.1. Curiously, Item 5.4 is identified as a “Major Site Plan”, while Item 6.1 requests the release of building permits prior to approval of the Major Site Plan. Both items reference #32969 on the agenda and in their respective back-up materials. In fact, the back-up materials are identical, except that Item 6.1 includes a DRC Waiver Request Form as page 5 of 256.

The DRC lacks the power and authority to grant a waiver to release building permits prior to approval of the Major Site Plan as requested in Item 6.1.

Land Development Code (“LDC”) Section 2.10.1 establishes the DRC’s limited authority to grant waivers. In sum, the DRC can only waive (1) certain code requirements when not applicable to the proposed type of development, or (2) where alternative standards may promote flexibility, economical flexibility, and environmental soundness in the layout and design. Neither scenario is applicable to the request in Item 6.1. There are no inapplicable code requirements, and no alternative standards are being proposed or approved. Clearly, the DRC waiver process was intended to apply to design and improvement standards, not the fundamental application, review, and approval procedures and requirements of the LDC. Any DRC waiver of this nature is ultra vires and illegal.

Given the significant legal and administrative challenges that the County is already facing with respect to Golden Ocala’s Sports Complex Applications, it would be wise for the DRC to table Items 5.4 and 6.1 until the County Attorney has an opportunity to review and provide appropriate guidance.

Sincerely,

A handwritten signature in blue ink, appearing to be "G. Brockway".

G. Matthew Brockway

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Matthew “Guy” Minter, Esq.  
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