



TRAILS COMMUNITY DEVELOPMENT DISTRICT

FINANCIAL STATEMENTS

Year Ended September 30, 2015

TRAILS COMMUNITY DEVELOPMENT DISTRICT

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Year Ended September 30, 2015

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INDEPENDENT AUDITOR'S REPORT

To the Board of Supervisors
Trails 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 *Trails Community Development District* (the "District"), as of and for the year ended September 30, 2015, 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 fair 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 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 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.

MCDIRMIT DAVIS & COMPANY, LLC

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Opinions

Basis for Adverse Opinion Due to Omission of Component Unit

Management has not included a blended component unit, Special Revenue Fund - Special Purpose Entity ("SPE"), in the Trails Community Development District's financial statements. Accounting principles generally accepted in the United States of America require this Special Revenue Fund to be presented as a major governmental fund and financial information about this Fund to be part of the governmental activities, thus increasing the activity's assets, liabilities, revenues, and expenses, and changing its net position. The amount by which this departure would affect the assets, liabilities, net position, revenues and expenses of the governmental activities and the omitted major fund is not reasonably determinable.

Adverse Opinion on Governmental Activities and Special Revenue Fund

In our opinion, because of the omission of the Special Revenue Fund, the financial statements referred to above do not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of the Special Revenue Funds and the governmental activities of the District, as of September 30, 2015, and the respective changes in financial position thereof for the fiscal year then ended.

Unmodified Opinion on General, Debt Service and Capital Project Funds

In addition, in our opinion, the financial statements of the General Fund, Debt Service Fund, and Capital Projects Fund present fairly, in all material respects, the respective financial position of each fund, referred to above, as of September 30, 2015, and the respective changes in financial position thereof, and the respective 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's discussion and analysis starting on page 4, 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 Information

As discussed in Notes 5 and 6, the District's financial condition has deteriorated. Due to the deteriorating financial condition, there were insufficient funds to operate the District. As a result, certain scheduled debt service payments in prior years were not made when due. As a result, the land with delinquent assessments was transferred to a Special Purpose Entity ("SPE") created by the Trustee and debt service assessments on the land will be abated until the land is subsequently sold. As a result of these events, the District failed to make certain scheduled debt service payments in the 2009 through 2014 fiscal years. Beginning in the previous fiscal year, the District is being funded, in part, by the SPE for its operations and maintenance expenditures. However, the effect of these actions on the District's financial condition cannot be determined at this time.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued a report dated February 22, 2016, 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 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.

McDiernit Davis & Company, LLC

Orlando, Florida
February 22, 2016

MANAGEMENT'S DISCUSSION AND ANALYSIS

Our discussion and analysis of the *Trails Community Development District's* (the "District") financial accomplishments provide an overview of the District's financial activities for the year ended September 30, 2015. 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 liabilities of the District exceeded its assets at September 30, 2015 by \$4,694,957, a decrease in the net position of \$505,588 in comparison with the prior year.
- At September 30, 2015, the District's governmental funds reported fund balances of \$(1,320,568), a decrease of \$363,104 in comparison with the prior year.

Overview of the Financial Statements

This discussion and analysis is intended to serve as an introduction to the *Trails Community Development District's* financial statements. The District's financial statements comprise 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, liabilities, and deferred inflows/outflows of resources, with the difference between the three 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 only 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 and culture and recreation related functions.

MANAGEMENT'S DISCUSSION AND ANALYSIS (CONTINUED)

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 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 \$(4,694,957) at September 30, 2015. The analysis that follows focuses on the net position of the District's governmental activities.

MANAGEMENT'S DISCUSSION AND ANALYSIS (CONTINUED)

Government-Wide Financial Analysis (Continued):

Trails Community Development District
Statement of Net Position

	September 30, 2015	September 30, 2014
Assets, excluding capital assets	\$ 1,234,914	\$ 999,976
Capital Assets, not being depreciated	<u>5,641,653</u>	<u>5,984,137</u>
Total assets	<u>6,876,567</u>	<u>6,984,113</u>
Liabilities, excluding long-term liabilities	2,761,524	2,163,482
Long-term liabilities	<u>8,810,000</u>	<u>9,010,000</u>
Total liabilities	<u>11,571,524</u>	<u>11,173,482</u>
Net Position:		
Net investment in capital assets	223,765	566,249
Restricted for capital projects	560	237
Unrestricted	<u>(4,919,282)</u>	<u>(4,755,855)</u>
Total net position	<u>\$ (4,694,957)</u>	<u>\$ (4,189,369)</u>

The following is a summary of the District's governmental activities for the fiscal years ended September 30, 2015 and 2014.

Changes in Net Position
Year ended September 30,

	2015	2014
Revenues:		
Program revenues	\$ 902,515	\$ 934,049
General revenues	<u>445</u>	<u>177</u>
Total revenues	<u>902,960</u>	<u>934,226</u>
Expenses:		
General government	151,907	115,576
Maintenance and operations	395,275	383,547
Culture and recreation	104,278	103,681
SPE Costs	262,588	239,992
Interest on long-term debt	<u>494,500</u>	<u>500,323</u>
Total expenses	<u>1,408,548</u>	<u>1,343,119</u>
Change in net position	(505,588)	(408,893)
Net Position - beginning	<u>(4,189,369)</u>	<u>(3,780,476)</u>
Net Position - ending	<u><u>\$ (4,694,957)</u></u>	<u><u>\$ (4,189,369)</u></u>

As noted above and in the statement of activities, the cost of all governmental activities during the year ended September 30, 2015 was \$1,408,548. The majority of these costs are maintenance and operations and interest on long-term debt.

MANAGEMENT'S DISCUSSION AND ANALYSIS (CONTINUED)

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, 2015, the District's governmental funds reported combined ending fund balances of \$(1,320,568). Of this total, \$12,513 is nonspendable, \$560 is restricted, and \$(1,333,641) is unassigned.

The fund balance of the general fund increased by \$99,351 in the current year due to an increase in assessments received. The fund balance of the debt service fund decreased by \$462,778 in the current year due to delinquent debt service assessments. The fund balance in the capital projects fund increased by \$323.

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 is adopted using the same basis of accounting that is used in preparation of the fund financial statements. There were no budget amendments to the September 30, 2015 general fund budget. The legal level of budgetary control is at the fund level.

Capital Asset and Debt Administration

Capital Assets - At September 30, 2015, the District had \$5,641,653 invested in capital assets. More detailed information about the District's capital assets is presented in the notes to financial statements.

Capital Debt - At September 30, 2015, the District had \$9,200,000 in bonds outstanding, including matured bonds payable of \$390,000. 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 the *Trails Community Development District's* Finance Department at 3434 Colwell Avenue, Suite 200, Tampa, Florida 33614.

FINANCIAL STATEMENTS

TRAILS COMMUNITY DEVELOPMENT DISTRICT

STATEMENT OF NET POSITION

September 30, 2015

	Governmental Activities
Assets:	
Cash	\$ 185,173
Prepaid costs and deposits	12,513
Restricted assets:	
Temporarily restricted investments	1,037,228
Capital Assets:	
Capital assets being depreciated, net	<u>5,641,653</u>
Total assets	<u>6,876,567</u>
Liabilities:	
Accounts payable and accrued expenses	12,794
Accrued interest payable	206,042
Matured bonds payable	390,000
Matured interest payable	2,152,688
Noncurrent liabilities:	
Due within one year	210,000
Due in more than one year	<u>8,600,000</u>
Total liabilities	<u>11,571,524</u>
Net Position:	
Net investment in capital assets	223,765
Restricted for capital projects	560
Unrestricted	<u>(4,919,282)</u>
Total net position	<u>\$ (4,694,957)</u>

The accompanying Notes to Financial Statements are an integral part of this statement.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

STATEMENT OF ACTIVITIES

Year Ended September 30, 2015

<u>Functions/Programs</u>	<u>Program Revenue</u>			<u>Net (Expense)</u>
	<u>Expenses</u>	<u>Charges for</u>	<u>Operating</u>	<u>Revenue and</u>
		<u>Services</u>	<u>Grants and</u>	<u>Change in Net</u>
			<u>Contributions</u>	<u>Position</u>
				<u>Governmental</u>
				<u>Activities</u>
Governmental activities:				
General government	\$ 151,907	\$ 60,739	\$ -	\$ (91,168)
Maintenance and operations	395,275	158,046	-	(237,229)
Culture and recreation	104,278	41,694	-	(62,584)
SPE Costs	262,588	104,993	-	(157,595)
Interest on long-term debt	494,500	536,853	190	42,543
Total governmental activities	<u>\$ 1,408,548</u>	<u>\$ 902,325</u>	<u>\$ 190</u>	<u>(506,033)</u>
General Revenues:				
Miscellaneous income				445
Total general revenues				<u>445</u>
Change in net position				(505,588)
Net Position - beginning				<u>(4,189,369)</u>
Net Position - ending				<u>\$ (4,694,957)</u>

The accompanying Notes to Financial Statements are an integral part of this statement.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

BALANCE SHEET
GOVERNMENTAL FUNDS

September 30, 2015

	<u>General</u>	<u>Debt Service</u>	<u>Capital Projects</u>	<u>Total Governmental Funds</u>
Assets:				
Cash	\$ 185,173	\$ -	\$ -	\$ 185,173
Investments	-	1,036,668	560	1,037,228
Prepaid costs and deposits	12,513	-	-	12,513
Total assets	<u>\$ 197,686</u>	<u>\$1,036,668</u>	<u>\$ 560</u>	<u>\$ 1,234,914</u>
Liabilities and Fund Balances:				
Liabilities:				
Accounts payable and accrued expenses	\$ 12,794	\$ -	\$ -	\$ 12,794
Matured bonds payable	-	390,000	-	390,000
Matured interest payable	-	2,152,688	-	2,152,688
Total liabilities	<u>12,794</u>	<u>2,542,688</u>	<u>-</u>	<u>2,555,482</u>
Fund Balances:				
Nonspendable	12,513	-	-	12,513
Restricted for:				
Capital projects	-	-	560	560
Unassigned	172,379	(1,506,020)	-	(1,333,641)
Total fund balances	<u>184,892</u>	<u>(1,506,020)</u>	<u>560</u>	<u>(1,320,568)</u>
Total liabilities and fund balances	<u>\$ 197,686</u>	<u>\$1,036,668</u>	<u>\$ 560</u>	

Amounts reported for governmental activities in the statement of net position is different because:

Capital assets used in governmental activities are not financial resources and, therefore, are not reported in the funds.

5,641,653

Liabilities not due and payable from current available resources are not reported in governmental fund statements. All liabilities, both current and long-term, are reported in the government-wide statements.

Accrued interest payable (206,042)

Bonds payable (8,810,000)

(9,016,042)

Net position of governmental activities (page 7)

\$ (4,694,957)

The accompanying Notes to Financial Statements are an integral part of this statement.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
GOVERNMENTAL FUNDS

Year Ended September 30, 2015

	<u>General</u>	<u>Debt Service</u>	<u>Capital Projects</u>	<u>Total Governmental Funds</u>
Revenues:				
Special assessments	\$ 365,472	\$ 536,853	\$ -	\$ 902,325
Miscellaneous income	122	-	323	445
Investment income	-	190	-	190
Total revenues	<u>365,594</u>	<u>537,043</u>	<u>323</u>	<u>902,960</u>
Expenditures:				
Current:				
General government	109,174	42,733	-	151,907
Maintenance and operations	99,825	-	-	99,825
Culture and recreation	57,244	-	-	57,244
SPE Costs	-	262,588	-	262,588
Debt service:				
Interest	-	494,500	-	494,500
Principal	-	200,000	-	200,000
Total expenditures	<u>266,243</u>	<u>999,821</u>	<u>-</u>	<u>1,266,064</u>
Net change in fund balances	99,351	(462,778)	323	(363,104)
Fund Balances - beginning of year	<u>85,541</u>	<u>(1,043,242)</u>	<u>237</u>	<u>(957,464)</u>
Fund Balances - end of year	<u>\$ 184,892</u>	<u>\$ (1,506,020)</u>	<u>\$ 560</u>	<u>\$ (1,320,568)</u>

The accompanying Notes to Financial Statements are an integral part of this statement.

TRAILS 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, 2015

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

Net Change in Fund Balances - total governmental funds (page 10)	\$ (363,104)
Depreciation of capital assets is not recognized in the governmental fund statements but is reported as an expense in the statement of activities.	(342,484)
Repayments of long-term liabilities are reported as expenditures in governmental funds, while repayments reduce long-term liabilities in the statement of net position.	<u>200,000</u>
Change in Net Position of Governmental Activities (page 8)	<u><u>\$ (505,588)</u></u>

The accompanying Notes to Financial Statements are an integral part of this statement.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE
BUDGET AND ACTUAL - GENERAL FUND

Year Ended September 30, 2015

	Budgeted Amounts		Actual Amounts	Variance with Final Budget Positive (Negative)
	Original	Final		
Revenues:				
Special Assessments	\$ 365,169	\$ 365,169	\$ 365,472	\$ 303
Investment and Miscellaneous Income	-	-	122	122
Total revenues	<u>365,169</u>	<u>365,169</u>	<u>365,594</u>	<u>425</u>
Expenditures:				
Current:				
General government	105,748	105,748	109,174	(3,426)
Physical environment	114,200	114,200	99,825	14,375
Culture and recreation	123,421	123,421	57,244	66,177
Capital outlay	<u>21,800</u>	<u>21,800</u>	<u>-</u>	<u>21,800</u>
Total expenditures	<u>365,169</u>	<u>365,169</u>	<u>266,243</u>	<u>98,926</u>
Net change in fund balance	-	-	99,351	99,351
Fund Balances - beginning of year	<u>85,541</u>	<u>85,541</u>	<u>85,541</u>	<u>-</u>
Fund Balances - end of year	<u>\$ 85,541</u>	<u>85,541</u>	<u>\$ 184,892</u>	<u>\$ 99,351</u>

The accompanying Notes to Financial Statements are an integral part of this statement.

NOTES TO FINANCIAL STATEMENTS

TRAILS COMMUNITY DEVELOPMENT DISTRICT

NOTES TO FINANCIAL STATEMENTS

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies:

Reporting Entity

Trails Community Development District, (the "District") was established on September 12, 2006 by Ordinance 2006-861-E of the City of Jacksonville, Florida 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 the landowners of the District. At September 30, 2015, two of the Board members were affiliated with D.R. Horton, Inc. - Jacksonville (the "Developer") and two with the SPE. The Board exercises all powers granted to the District pursuant to Chapter 190, Florida Statutes.

The Board has final responsibility for:

1. Allocating and levying assessments.
2. Approving budgets.
3. Exercising control over facilities and properties.
4. 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 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. Management has determined that 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.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies (Continued):

Government-Wide and Fund Financial Statements (Continued)

The statement of activities demonstrates the degree to which the direct expenses of a given function or segment is 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.

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. 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 certain 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 certain 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.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies (Continued):

Measurement Focus, Basis of Accounting and Financial Statement Presentation (Continued):

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 is 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 financial resources to be used for the acquisition or construction of major infrastructure within the District.

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. The District's investments consist of investments authorized per their investment policy adopted in accordance with Section 218.415, Florida Statutes.

Receivables - All receivables are shown net of 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.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies (Continued):

Assets, Liabilities, Deferred Outflows/Inflows of Resources, and Net Position/Fund Balance (Continued):

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 government 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 estimated fair market 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 lives:

<u>Assets</u>	<u>Years</u>
Stormwater System	25
Recreation Facility	20
Equipment	5-10

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. 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, 2015.

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, 2015.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies (Continued):

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

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 1 - Summary of Significant Accounting Policies (Continued):

Assets, Liabilities, Deferred Outflows/Inflows of Resources, and Net Position/Fund Balance (Continued):

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.

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.
5. The budgets are adopted on a basis consistent with accounting principles generally accepted in the United States of America.

Deficit Fund Balance

At September 30, 2015, the District had a deficit fund balance of \$1,506,020 in the debt service fund.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

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

Investments are stated at fair value, which is the amount for which an investment could be exchanged in a current transaction between willing parties, other than in a forced liquidation sale. Fair value is based on quoted market prices. Changes in the fair value of investments are recognized as revenue and included in investment revenue. Investment revenue is recognized as earned and is recorded in the respective funds related to the investment activity.

The District's investment policy is governed by State Statutes and the District Trust Indenture. The District investment policy allows investments in any financial institution that is a qualified public depository of the State of Florida as identified by the State Treasurer, in accordance with Chapter 280 of the Florida Statutes. Authorized District investments include, but are not limited to:

1. The Local Government Surplus Funds Trust Fund (SBA);
2. 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;

Investments made by the District at September 30, 2015 are summarized below. In accordance with GASB 31, investments are reported at fair value.

<u>Investment Type</u>	<u>Fair Value</u>	<u>Credit Rating</u>	<u>Weighted Average Maturity</u>
US Bank Managed Money Market	\$ 1,037,228	N/A	N/A

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 3 - Deposits and Investments (Continued):

Investments (Continued):

Credit Risk:

The District's investment policy limits credit risk by restricting authorized investments to those described. 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.

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, 2015, 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 district 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, 2015, 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's investment policy does not specify limits on the amount the District may invest in any one issuer.

Interest Rate Risk:

The District's investment policy does not specifically address interest rate risk; however, the general investment policy is to apply the prudent-person rule: Investments are made as a prudent person would be expected to act, with discretion and intelligence, to seek reasonable income, preserve capital, and in general, avoid speculative investments. 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.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 4 - Capital Assets:

Capital asset activity for the year ended September 30, 2015 was as follows:

	<u>Beginning Balance</u>	<u>Additions</u>	<u>Disposals</u>	<u>Ending Balance</u>
Governmental Activities:				
Capital Assets Being Depreciated:				
Stormwater system	\$ 7,266,354	\$ -	\$ -	\$ 7,266,354
Recreation facility	940,672	-	-	940,672
Equipment	29,325	-	-	29,325
Total capital assets being depreciated	<u>8,236,351</u>	<u>-</u>	<u>-</u>	<u>8,236,351</u>
Less Accumulated Depreciation for:				
Stormwater system	(2,034,578)	(290,654)	-	(2,325,232)
Recreation facility	(211,652)	(47,034)	-	(258,686)
Equipment	(5,984)	(4,796)	-	(10,780)
Total accumulated depreciation	<u>(2,252,214)</u>	<u>(342,484)</u>	<u>-</u>	<u>(2,594,698)</u>
Total capital assets being depreciated, net	<u>5,984,137</u>	<u>(342,484)</u>	<u>-</u>	<u>5,641,653</u>
Governmental activities capital assets, net	<u>\$ 5,984,137</u>	<u>\$ (342,484)</u>	<u>\$ -</u>	<u>\$ 5,641,653</u>

Depreciation expense for 2015 in the amount of \$295,450 was charged to maintenance and operations and \$47,034 was charged to recreation.

Note 5 - Long-Term Liabilities:

Series 2007 Bonds

In January 2007, the District issued \$10,935,000 of Series 2007 Special Assessment Bonds due on May 1, 2038 at a fixed interest rate of 5.375%. The Bonds were issued to retire all of the District's outstanding Special Assessment Bond Anticipation Notes, Series 2006; finance a portion of the costs of the Series 2007 Project and pay the costs of issuance of the Series 2007 Bonds. Interest is to be paid semi-annually on each May 1 and November 1. Principal on the Bonds is to be paid serially commencing May 1, 2009 through May 1 2038.

The Bonds are subject to redemption at the option of the District prior to maturity. The Bonds are also subject to mandatory redemption prior to their selected maturity in the manner determined by the Bond Registrar if certain events occurred as outlined in the Bond Indenture.

The Bond Indenture established a debt service reserve requirement as well as other restrictions and requirements relating principally to the use of proceeds to apply for the infrastructure improvements and the procedures to be followed by the District on assessments to property owners. The District agrees to levy special assessments in annual amounts adequate to provide payment of debt service and to meet the reserve requirements. The District was not in compliance with the reserve requirement at September 30, 2015.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 5 - Long-Term Liabilities (Continued):

Series 2007 Bonds (Continued)

During previous years, the Developer and landowners failed to pay their share of assessments. As a result, the land with delinquent assessments was transferred to the SPE created by the Trustee and debt service assessments on the property will be abated until the property is subsequently sold. As a result of these events, the District failed to make certain scheduled debt service payments in the 2009 through 2014 fiscal years. During the previous fiscal year, the Trustee utilized funds accumulated in the bond redemption and prepayment accounts to pay previous amounts owed for principal (\$815,000) and interest (\$209,625) and to pay down the Bonds by \$485,000. However, the District did not pay the principal and interest due for the fiscal year September 30, 2014. These amounts were included in matured bonds and matured interest payable at September 30, 2014.

During the current fiscal year, the District did not pay the current debt service requirements when due. The amounts of \$200,000 principal due and \$494,500 interest due were included in matured bonds and matured interest payable. The total of past due debt service requirements at September 30, 2015 was \$390,000 of matured bonds and \$2,152,688 of matured interest payable which have been included in the accompanying government-wide and fund financial statements. The District did pay \$72,562 of matured interest payable during the fiscal year ended September 30, 2015.

As of September 30, 2015, total principal and interest remaining on the 2007 Bonds amounts to \$18,334,812, which includes matured bonds payable of \$390,000 and matured interest payable of \$2,152,688. For the year ended September 30, 2015, total special assessment revenue pledged was \$536,853.

Changes in long-term liability activity for the fiscal year ended September 30, 2015 were as follows:

	<u>Beginning Balance</u>	<u>Additions</u>	<u>Reductions</u>	<u>Ending Balance</u>	<u>Due Within One Year</u>
Governmental Activities:					
Bonds Payable:					
Series 2007	\$ 9,010,000	\$ -	\$ (200,000)	\$ 8,810,000	\$ 210,000
Governmental activity long-term liabilities	<u>\$ 9,010,000</u>	<u>\$ -</u>	<u>\$ (200,000)</u>	<u>\$ 8,810,000</u>	<u>\$ 210,000</u>

TRAILS COMMUNITY DEVELOPMENT DISTRICT

NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 5 - Long-Term Liabilities (Continued):

At September 30, 2015, The schedule of debt service requirements on the bonds payable were as follows, excluding amounts owed for matured bonds and matured interest that are shown as currently due in the government-wide and fund financial statements.

<u>Year Ending September 30,</u>	<u>Governmental Activities</u>	
	<u>Principal</u>	<u>Interest</u>
2016	\$ 210,000	\$ 494,500
2017	225,000	483,212
2018	235,000	471,118
2019	250,000	458,488
2020	265,000	445,050
2021 - 2025	1,555,000	1,995,468
2026 - 2030	2,030,000	1,529,188
2031 - 2035	2,655,000	920,736
2036 - 2038	1,385,000	184,364
	<u>\$ 8,810,000</u>	<u>\$ 6,982,124</u>

Note 6 - Related Parties:

Bond Default and Special Purpose Entity:

The Developer owns a significant portion of land within the District; therefore, assessment revenue in the general and debt service funds include the assessments levied on those lots owned by the Developer. During previous fiscal years, the Developer and a major landowner, BSHW Winchester Ridge, did not pay a significant portion of their assessments. As a result, BSHW Winchester Ridge, LLC, a former significant landowner, sold all of its assessable property within the District's boundaries back to the Developer. The assessable property included an area of platted lots and an area of unplatted land. In a prior fiscal year, the District entered into a settlement agreement with the Developer regarding the remaining delinquent assessments and the unplatted parcel was transferred to a Special Purpose Entity ("SPE").

Due to the non-collection of assessments from the Developer and previous landowner, the District did not make certain scheduled debt service payments, which is considered an event of default. Pursuant to the Bond Indenture, the Trustee, on behalf of the Bondholders, has access to the funds held on deposit in the trust accounts. As a result of the default and the settlement agreement with the Developer, a SPE was created by the Trustee in a prior fiscal year to own and maintain the property subject to delinquent Series 2007 assessments. The SPE accepted unplatted lots owned by the Developer in lieu of foreclosure. In addition, an agreement was entered into between the District and the SPE, whereby, debt service assessments on the Series 2007 Bonds would be forborne but continue to constitute a lien on the property.

TRAILS COMMUNITY DEVELOPMENT DISTRICT
NOTES TO FINANCIAL STATEMENTS (CONTINUED)

Year Ended September 30, 2015

Note 6 - Related Parties (Continued):

Bond Default and Special Purpose Entity (Continued):

In October 2012, the District entered into an agreement with the SPE whereby no operating and maintenance assessments would be assessed on property owned by the SPE. In lieu of assessment, the SPE agreed to fund the actual expenses of the District to the extent that expenditures exceed special assessment levied and collected by the District. During the fiscal year ended September 30, 2015, \$183,337 was received from the SPE by the general fund to help cover the operations and maintenance costs of the District. The parties acknowledge that operation and maintenance assessments on the Property shall continue to be a lien in accordance with Florida Law. The agreement states that in the event funds are no longer available in the trust accounts and another funding source has not been secured or changes affecting the delinquent lands results in increased risk to the SPE or related parties, the SPE may convey the lands to the District for ownership and maintenance.

Concentrations:

In the current year, special assessment revenue from the Developer was \$506,400, 56% of total special assessment revenue. Special assessment revenue from the SPE was \$281,097, 32% of total special assessment revenue.

The District's activity is dependent upon the continued involvement of the Developer, Bondholder and future owners of the land with the delinquent assessments, the loss of which could have a material adverse effect on the District's operations.

Note 7 - Deficit Net Position:

The District has a government-wide net deficit of (\$4,694,957) at September 30, 2015. This deficit results from capital assets which were financed by District long-term debt and conveyed to other governmental entities and delinquent assessments not received from the Developer and certain landowners. The delinquent assessments have also created a deficit fund balance in the Debt Service Fund at September 30, 2015.

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 9 - Subsequent Events:

As a result of significant delinquent assessments and abeyance of certain debt service assessments, the District did not have sufficient funds available to make the scheduled debt service interest payment of \$247,250 in November 2015.

COMPLIANCE SECTION

**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
Trails 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 *Trails Community Development District* (the "District") as of and for the year ended September 30, 2015, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated February 22, 2016, which includes an explanatory paragraph regarding the adverse opinion for the omission of the blended component unit.

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 identified a deficiency that we consider to be a material weakness as described in Appendix A.

MCDIRMIT DAVIS & COMPANY, LLC

934 NORTH MAGNOLIA AVENUE, SUITE 100 ORLANDO, FLORIDA 32803
TELEPHONE: 407-843-5406 FAX: 407-649-9339 EMAIL: INFO@MCDIRMITDAVIS.COM

Compliance and Other Matters

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

We noted certain other matters that we reported to management of the District in a separate letter dated February 22, 2016. The District's response to our findings identified in our audit is included in this report. We did not audit the District's response, and accordingly, we express no opinion on it.

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.

McDiernit Davis & Company, LLC

Orlando, Florida
February 22, 2016

MANAGEMENT COMMENTS

Board of Supervisors
Trails Community Development District

Report on the Financial Statements

We have audited the financial statements of the *Trails Community Development District*, (the “District”) as of and for the fiscal year ended September 30, 2015, and have issued our report thereon dated February 22, 2016, which includes an adverse opinion due to the omission of a component unit.

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 Reports

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, Section 601, regarding compliance requirements in accordance with Chapter 10.550, Rules of the Auditor General. Disclosures in those reports, which are dated February 22, 2016, should be considered in conjunction with this management letter.

Prior Audit Findings

Section 10.554(1)(i).1., Rules of the Auditor General, require that we determine whether or not corrective actions have been taken to address findings and recommendations made in the preceding annual financial audit report. Corrective actions have been taken to address findings and recommendations made in the preceding annual financial audit report, except as noted below.

Tabulation of Uncorrected Audit Findings		
Current Year Finding #	2013-14 FY Finding #	2012-2013 FY Finding #
14-01	14-01	N/A

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

Section 10.554(1)(i)5.a. and 10.556(7), Rules of the Auditor General, requires that we report 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 identification of the specific condition(s) met. In connection with our audit, we determined that the District did not meet any condition described in Section 218.503(1), Florida Statutes.

Pursuant to Sections 10.554(1)(i)5.c. and 10.556(8), Rules of the Auditor General, we applied financial condition assessment procedures. It is management's responsibility to monitor the District 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. We did note deteriorating financial conditions as disclosed in Appendix C.

Annual Financial Report

Section 10.554(1)(i)5.b. and 10.556(7), Rules of the Auditor General, requires that we apply appropriate procedures and report the results of our determination as to whether the annual financial report for the District for the fiscal year ended September 30, 2015, filed with the Florida Department of Financial Services pursuant to Section 218.32(1)(a), Florida Statutes, is in agreement with the annual financial audit report for the fiscal year ended September 30, 2015. In connection with our audit, we determined that these two reports were in agreement.

Other Matters

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

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

McDiernit Davis & Company, LLC

Orlando, Florida
February 22, 2016

TRAILS COMMUNITY DEVELOPMENT DISTRICT

APPENDIX A - MATERIAL WEAKNESS

Year Ended September 30, 2015

15-01 - Failure to Include Component Unit Financial Statements in the Financial Report

Criteria

Generally accepted accounting principles require that the District include the financial statements of the Special Purpose Entities ("SPE's") in their audited financial report as blended component units.

Condition

The SPE's are not included as component units in the District's financial report.

Cause

It is the District's position that the SPE is not a component unit of the District.

Effect

McDermitt Davis could not audit these records nor include them as blended component units in the District's government-wide financial statements.

Recommendation

We recommend the District include the SPE's as blended components unit of the District's government-wide financial statements.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

APPENDIX B - COMPLIANCE, VIOLATIONS OF LAWS, REGULATIONS AND CONTRACTUAL PROVISIONS

Year Ended September 30, 2015

15-02 - Failure to Meet Debt Service Reserve Account Requirement

Criteria

The Trust Indenture requires the District to maintain a minimum balance in the Series 2007 Debt Service Reserve Accounts.

Condition

At September 30, 2015, the Debt Service Reserve Accounts were deficient.

Cause

The balance in the Debt Service Reserve Accounts were used to pay prior year debt service on the Bonds.

Effect

The District is not in compliance with the Trust Indentures.

Recommendation

We recommend the District utilize all remedies available to replenish the Debt Service Reserve Account.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

APPENDIX C - FINANCIAL CONDITION ASSESSMENT

Year Ended September 30, 2015

14-01 - Financial Condition Assessment

The District's financial condition has deteriorated. In a prior year, the Developer failed to pay debt service assessments, causing the District to be unable to pay certain debt service payments when due. An event of default was declared and the debt was subsequently restructured with the agreement of the bondholders. The restructured agreement requires no current payments and the SPE is now funding the District; however, the overall effect of these actions on the District's financial condition cannot be determined at this time.

TRAILS COMMUNITY DEVELOPMENT DISTRICT

DISTRICT OFFICE · 2806 N. FIFTH STREET · UNIT 403 · ST. AUGUSTINE, FLORIDA 32084
(904) 436-6270

February 22, 2016

Response to the Management Letter for the fiscal year ended September 30, 2015

Management Letter finding 15-01:

The auditor noted that the SPEs are not included as blended component units of the District.

District response to the finding:

Management does not agree that the Special Purpose Entities should be included as blended component units on the government-wide financial statements. In summary, management feels that it would be misleading to the users of the financial statements to include the SPEs as component units for the following reasons. The District has no ownership and/or control over the SPEs and in no way can it impose its will on the SPEs. In addition, the District will not benefit from the activities of the SPEs. When the land held by the SPEs is sold, the proceeds will be paid to the Bondholders to satisfy the Bond debt. The District will not be responsible for any deficiency between the net proceeds of the sale and the associated Bond debt.

Management Letter finding 15-02:

The auditor noted that the District's Debt Service Reserve Account was deficient at September 30, 2015, as a result of funds from the Reserve Accounts being used to pay prior year debt service payments.

District response to the finding:

The District and the Bondholders have been working to alleviate this issue. During a prior year a SPE took title to the land subject to special assessment lien for resale or development. An agreement was entered into between the District and SPE, whereby, debt service assessments on the Series 2007 Bonds would be forborne but continue to constitute a lien on the property. . Until the land is developed or sold to another developer the Districts financial condition will remain the same

Management Letter finding 14-01:

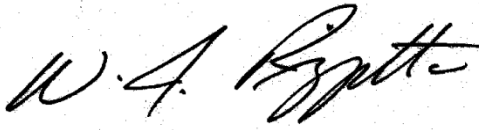
The auditor noted that the District's financial condition has deteriorated

District response to the finding:

The District has taken every available measure to comply with the trust indenture. The District and Trustee, on behalf of the bondholders, are working to alleviate this issue. During a prior year a SPE took title to the land subject to special assessment lien for resale or development. The operation and

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maintenance assessments relating to the land are the responsibility of the SPE. Until the land is developed or sold to another developer the Districts financial condition will remain the same.



William J. Rizzetta
Treasurer
Trails Community Development District

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

Board of Supervisors
Trails Community Development District

We have examined *Trails Community Development District's* (the "District") compliance with the requirements of Section 218.415, Florida Statutes, during the year ended September 30, 2015. 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, 2015.

MCDIRMIT DAVIS & COMPANY, LLC

Orlando, Florida
February 22, 2016