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**RUDEN
MCCLOSKEY
SMITH
SCHUSTER &
RUSSELL, P.A.
ATTORNEYS AT LAW**

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COMMISSION
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215 SOUTH MONROE STREET
SUITE 815
TALLAHASSEE, FLORIDA 32301

(850) 412-2000
FAX: (850) 224-2032
KATHRYN.COWDERY@RUDEN.COM

March 27, 2002

Blanca S. Bayo, Director
Division of Commission Clerk
and Administrative Services
Betty Easley Bldg., Room 110
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Via Hand Delivery

Re: Docket No. 020102-WU
Application for Transfer of Majority Organizational Control of CWS
Communities LP (Haselton Village), Holder of Certificate Nos. 518-W in
Highlands County

Dear Ms. Bayo:

This letter responds to the March 7, 2002 deficiency letter from Ms. Patti Daniel regarding the above application. I will respond to the identified deficiencies in the same order as they are listed in the March 7, 2002 letter.

1. Financing of purchase (Rule 25-30.037(3)(e)). The financing of the transaction which resulted in the change of majority organizational control is identified in paragraph 4 of the application: "The transfer of majority organizational control of the Utility occurred as a result of OP unit (operating partnership unit)/stock transfer." CP Limited Partnership purchased the stock in CWS Communities Trust that was held by Security Capital who owned 94.1% of the stock in the Trust. OP units held in CWS Limited Partnership were converted by the merger agreement and holders of OP units were given the election to be sold for cash or conversion to OP units in CP Limited Partnership.

2. List of entities providing funding (Rule 25-30.037(3)(g)). An explanation of the manner and amount of funding to the utility, including financial statements and copies of any financial agreements, is addressed in paragraphs 5 and 7 of the application. Funding will continue to be provided ultimately through Chateau Communities, Inc. ("CCI"), the general partner of Chateau Communities Limited Partnership ("CCLP"), the general partner of CWS Communities LP. CWS Communities LP remains the owner of the utility. Attachment "B" to the application is CCI's 2000 Annual Report, which contains the consolidated financial statement of CCI. There is no separate financial agreement between CWS Communities LP and

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and Administrative Services
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CCI or CCLP regarding provision of funding, but funding will be provided on an "as needed" basis.

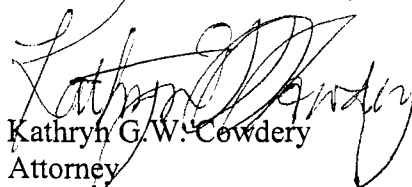
3. Evidence utility owns land (Rule 25-30.037(3)(i)). As explained in paragraph 9 of the application, since there has been no change in ownership, CWS Communities LP continues to own the land upon which the utility treatment facilities are located. The evidence that the utility owns the land, as provided to the commission previously in Docket No. 001083-WS, is attached hereto as Attachment "E."

4. Certificate No. 518-W has not been found. The utility is currently trying to locate the certificate and, if found, will submit it as soon as possible.

Please contact me if you have any questions.

Sincerely,

RUDEN, McCLOSKEY, SMITH,
SCHUSTER & RUSSELL, P.A.



Kathryn G.W. Cowdery
Attorney

KGC/ldm
Enclosures

cc:w/encl.: Patti Daniel, Supervisor of Certification
Stephanie Clapp, Division of Economic Regulation
Alice Crosby, Office of the General Counsel
Adrienne Vining, Office of the General Counsel

This Instrument Prepared By
and Requested Be Returned To:
Ronald L. Clark, Clark & Campbell, P.A.
Post Office Box 6559, Lakeland, FL 33807-6559

SPECIAL WARRANTY DEED

THIS SPECIAL WARRANTY DEED made the 30th day of March, 1999, by Haselton Properties, Ltd., a Florida limited partnership, whose address is 5015 South Florida Avenue, Suite 200, Lakeland, Florida 33813 and Century Realty Funds, Inc., a Florida corporation, whose address is 5015 South Florida Avenue, Suite 200, Lakeland, Florida 33813 (the "Grantor"), to CWS COMMUNITIES LP, a Delaware limited partnership, whose address is c/o CS Group, 7777 Market Center Avenue, El Paso, Texas 79912-8412 (the "Grantee"):

WITNESSETH: That the Grantor, for and in consideration of the sum of \$10.00 and other valuable consideration, receipt whereof is hereby acknowledged, hereby grants, bargains, sells, aliens, remises, releases, conveys and conforms unto the Grantee, all that certain land situate in Lake County, Florida ("Property"), viz:

SEE EXHIBIT "A" ATTACHED HERETO AND INCORPORATED
HEREIN BY REFERENCE.

This Conveyance is subject to the following:

1. Taxes and assessments for 1999 and subsequent years.
2. Tenants in possession under oral or written leases which do not include any right to purchase.
3. Easement to the Florida Power Corporation recorded at Official Records Book 117, Page 198, public records of Lake County, Florida.
4. Easement to the Florida Power Corporation recorded at Official Records Book 568, Page 726, public records of Lake County, Florida
5. Distribution Easement to the Florida Power Corporation recorded at Official Records Book 750, Page 463, public records of Lake County, Florida; and Distribution Easement to Florida Power Corporation recorded at Official Records Book 762, Page 1431, public records of Lake County, Florida.
6. Distribution Easement to the Florida Power Corporation recorded at Official Records Book 867, Page 1086, public records of Lake County, Florida.

7. Leases Recorded in the public records of Lake County, Florida, which do not contain a right to purchase.

8. Easement to Florida Power Corporation recorded at Official Records Book 896, Page 2196, public records, Lake County, Florida.

9. Subject to the Real Estate Mortgage and Security Agreement in favor of NCNB National Bank of Florida recorded at Official Records Book 1133, Page 2012, public records, Lake County, Florida; the Real Estate Modification Agreement at Official Records Book 1294, Page 2414, public records of Lake County, Florida; and the Mortgage Modification and Receipt of Future Advance Agreement recorded at Official Records Book 1589, Page 1553, public records of Lake County, Florida, all of which Grantee expressly assumes and agrees to pay.

10. Subject to the Assignment of Lessor's Interest in Leases, Rents and Profits, to NCNB National Bank of Florida dated October 11, 1991 and recorded November 1, 1991 at Official Records Book 1133, Page 2030, public records, Lake County, Florida which Grantee expressly assumes.

11. Subject to the Assignment of Rents, Leases, Income, Profits and Contracts to NationsBank of Florida, N.A., dated February, 27, 1998 and recorded March 6, 1998 at Official Records Book 1589, Page 2419, public records of Lake County, Florida which Grantee expressly assumes.

12. Subject to the Assignments of Rents, Leases, Income, Profits, Contracts to NationsBank, N.A., dated February 27, 1998, and recorded March 6, 1998 at Official Records Book 1589, Page 1559, public records of Lake County, Florida which Grantee expressly assumes.

13. Subject to the UCC Financing Statement in favor of NCNB National Bank of Florida recorded November 1, 1991 at Official Records Book 1133, Page 2035, public records of Lake County, Florida and continuation thereof recorded July 22, 1996 at Official Records Book 1452, Page 249, public records of Lake County Florida which Grantee expressly assumes.

The Grantor covenants that during Grantor's ownership of the Property, Grantor has not encumbered the Property or created any liens thereon, except as stated above and that lawful seisin of and good right to convey the Property are vested in the Grantor.

IN WITNESS WHEREOF, the said Grantor has signed and sealed these presents the day and year first above written.

Signed, sealed and delivered
in our presence:

Haselton Properties, Ltd., a
Florida limited partnership
By its General Partner:
Century Realty Funds, Inc., a
Florida corporation

Robert L. Madden
Name ROBERT L. MADDEN

By: Lawrence T. Maxwell
Lawrence T. Maxwell, its President

Jennifer S. O'Connell
Name Jennifer S. O'Connell

STATE OF FLORIDA
COUNTY OF POLK

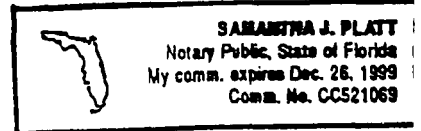
I HEREBY CERTIFY that on this day, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Lawrence T. Maxwell, President of Century Realty Funds, Inc., a Florida corporation, General Partner of Haselton Properties, Ltd., a Florida limited partnership, to me personally known or known to me by evidence of identification of _____ to be the person(s) described in and who executed the foregoing instrument and who did not take an oath.

WITNESS my hand and official seal in the County and State last aforesaid this 30th day of March, 1999.

My Commission Expires:

Samantha J. Platt
Notary Public

Century Realty Funds, Inc., a
Florida corporation



Robert L. Madden
Name ROBERT L. MADDEN

By: Lawrence T. Maxwell
Lawrence T. Maxwell, its President

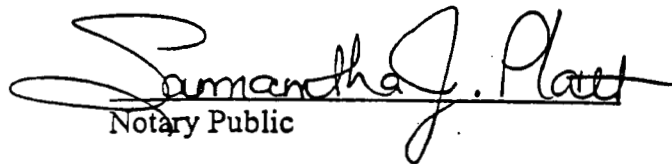
Jennifer S. O'Connell
Name Jennifer S. O'Connell

STATE OF FLORIDA
COUNTY OF POLK

I HEREBY CERTIFY that on this day, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Lawrence T. Maxwell, President of Century Realty Funds, Inc., a Florida corporation, to me personally known or known to me by evidence of identification of _____ to be the person(s) described in and who executed the foregoing instrument and who did not take an oath.

WITNESS my hand and official seal in the County and State last aforesaid this 30th day of March, 1999.

My Commission Expires:


Notary Public

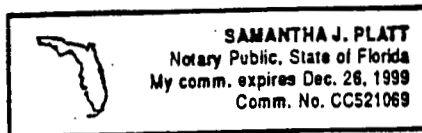


EXHIBIT "A"

LEGAL DESCRIPTION

PARCEL A: Beginning at the East 1/4 corner of Section 34, Township 18 South, Range 26 East, Lake County, Florida, run thence South $01^{\circ}48'30''$ West a distance of 600.06 feet, thence South $60^{\circ}02'15''$ East a distance of 258.75 feet to the Westerly right of way of County Road No. 19A, thence South $27^{\circ}20'27''$ West along said right of way, a distance of 529.11 feet to the beginning of a curve having a radius of 510.46 feet and being concave Easterly, thence along the arc of said curve and through a central angle of $23^{\circ}49'40''$ an arc length of 212.28 feet, thence South $01^{\circ}43'53''$ West along said Westerly right of way of County Road No. 19A, a distance of 369.71 feet to the Northerly right of way a distance of 806.22 feet, thence North $01^{\circ}52'26''$ East, a distance of 514.53 feet, thence North $89^{\circ}19'12''$ West a distance of 9.49 feet, thence North $01^{\circ}50'47''$ East a distance of 39.32 feet, thence South $89^{\circ}37'31''$ West a distance of 641.18 feet to the Southwest bank of a dug canal, thence North $25^{\circ}58'09''$ West along said Southwest bank of a dug canal, a distance of 304.55 feet, thence North $01^{\circ}51'37''$ East a distance of 641.18 feet to the Southwest bank of a dug canal, thence North $25^{\circ}58'09''$ West along said Southwest bank of a dug canal, a distance of 304.55 feet, thence North $01^{\circ}51'37''$ East a distance of 340.00 feet to the East-West Mid-Section line, thence South $88^{\circ}35'32''$ East along said East-West Mid-Section line, a distance of 1315.80 feet to the Point of Beginning.

PARCEL B: That part of the Northeast 1/4 of Section 34, Township 18 South, Range 26 East, Lake County, Florida, described as follows: Begin at the Southeast corner of said Northeast 1/4 of Section 34, run thence North $01^{\circ}54'49''$ East along the East line of said Northeast 1/4 a distance of 202.01 feet, thence North $42^{\circ}18'58''$ West 524.11 feet, thence South $22^{\circ}28'22''$ West 621.10 feet to a point on the South line of said Northeast 1/4 of Section 34, thence South $88^{\circ}35'32''$ East along the said South line of the Northeast 1/4 of Section 34, a distance of 583.71 feet to the Point of Beginning and Point of Terminus.

The above described PARCELS A and B are the same as in Warranty Deed recorded in Official Records Book 998, page 1974 of the Public Records of Lake County, Florida. Based on a ALTA/ACSM Land Title Survey (Boundary Survey) performed by Harold L. Wise, Professional Surveyor and Mapper Certificate No. 3456 of the State of Florida, completed on February 10, 1999, said PARCELS A and B are more particularly described as follows:

A tract of land situated in Sections 34 and 35, Township 18 South, Range 26 East, Lake County, Florida, being the same as Parcels A and B as described in Warranty Deed recorded in Official Records Book 998, page 1974 of the Public Records of said County and being more particularly described as follows:

Commence at a 4" square concrete monument being the East 1/4 corner of the aforementioned Section 34, Township 18 South, Range 26 East for the POINT OF BEGINNING and thence run along the boundaries of the aforementioned Parcel A the following fourteen (14) courses: (1)

thence run S.01°48'30"W., along the East line of said Section 34, a distance of 600.06 feet to a ½" steel rod and cap stamped GFY LB021 at the Southwest corner of Lot 7 of Caskey's Cove, a subdivision as per plat thereof recorded in Plat Book 16, page 21, of said Public records; (2) thence run S.60°04'59"E., along the Southerly line of a public roadway as per Dedication recorded in Official Records Book 340, page 151 of said Public Records, a distance of 258.64 feet (formerly a record distance of 258.75 feet) to a 3.5" round concrete monument and cap stamped LS1916 on the Westerly right of way line of County Road No. 19-A (66 feet wide right of way); (3) thence run S.27°18'47"E., along said Westerly right of way line, a distance of 511.70 feet (formerly a record distance of 529.11 feet) to a 1/2" steel rod and cap stamped GFY LB021 at the beginning of a curve concave Easterly and having a radius of 510.46 feet; (4) thence run Southerly, along said right of way line, with said curve, through a central angle of 25°25'50", an arc distance of 226.57 feet (formerly a record distance of 212.28 feet), said arc being subtended by a chord having a bearing and distance of S.14°35'52"E., 224.71 feet respectively to a ½" steel rod and cap stamped GFY LB021 at the end of said curve; (5) thence run S.01°52'57"W., along said Westerly right of way line, a distance of 372.63 feet (formerly a record distance of 369.71 feet) to a 4" square concrete monument marked SRD R/W at the intersection of said Westerly right of way line with the North right of way line of County Road No. 452-A, now known as County Road 44 (100 feet wide right of way); (6) thence run S.89°58'10"W., along said North right of way line, a distance of 806.11 feet (formerly a record distance of 806.22 feet) to a 3.5" round concrete monument and cap stamped LS1916; (7) thence leaving said North right of way line, run N.01°51'45"E., along the West line of the East 190.00 feet of the N. W. 1/4 of the S. E. 1/4 of the S. E. 1/4 of said Section 34, a distance of 514.40 feet (formerly a record distance of 514.53 feet) to a 3.5" round concrete monument and cap stamped LS1571 on the South line of the N.E. 1/4 of the S. E. 1/4 of said Section 34; (8) thence run N.89°17'10"W., along said South line, a distance of 9.49 feet to a ½" steel rod and cap stamped GFY LB021; (9) thence run N.°01'39'35"E., a distance of 39.55 feet (formerly a record distance of 39.62 feet) to a ½" steel rod and cap stamped HALL & FARN LB707; (10) thence run S.89°33'54"W., a distance of 339.50 feet (formerly a record distance of 339.62 feet) to a 3/5" round concrete monument and cap stamped LS1571; (11) thence run N.01°51'27"E. parallel with and 120.00 feet East of the West line of said N. E. 1/4 of the S. E. 1/4, a distance of 641.98 feet (formerly a record distance of 641.18 feet) to a 5/8" steel rod on the Southwesterly bank of a dug canal; (12) thence run N.23°55'37"W., along said Southwesterly bank of a dug canal, a distance of 275.93 feet (formerly a record distance of 304.55 feet) to a 5/8" steel rod on said West line of the N. E. 1/4 of the S. E. 1/4 of Section 34; (13) thence run N.01°47'59"E., along said West line, a distance of 360.90 feet (formerly a record distance of 340.00 feet) to a 4" octagonal concrete monument at the Northwest corner of said N. E. 1/4 of the S. E. 1/4 of Section 34; (14) thence run S.88°36'15"E., along the North line of said N. W. 1/4 of the S. E. 1/4 of Section 34 (East-West Mid-Section line), a distance of 731.10 feet to a ½" steel rod and cap stamped GFY LB021 at the Southwest corner of the aforementioned Parcel B, said corner is N.88°36'15"W., a distance of 583.71 feet from the aforementioned POINT OF BEGINNING; thence run along the boundaries of said Parcel B the following three (3) courses: (1) thence run N.22°20'47"E., a distance of 621.10 feet to a 3.5" round concrete monument and cap stamped LS1916; (2) thence run S.42°27'45"E., a distance of 524.05 feet (formerly a record distance of

524.11 feet) to a 3.5" round concrete monument and cap stamped LS1916 on the East line of the N. E. 1/4 of said Section 34; (3) thence run S.01°48'45"W., along said East line, a distance of 202.18 feet (formerly a record distance of 202.01 feet) to a 4" square concrete monument at the Southeast corner of said N. E. 1/4 of Section 34 and to close on the POINT OF BEGINNING.