



we make housing affordable

Office of Inspector General

Investigative Report

161130-01

March 10, 2017

Chris Hirst, Inspector General

Enhancing Public Trust in Florida's Affordable Housing

**Office of Inspector General
Investigative Report
Case Number 161130-01**

INTRODUCTION

On November 30, 2016, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a complaint via the Hardest Hit Fund (HHF) Report Fraud Website from Patricia McCoy alleging fraud on the part of Armand Houle, HHF Program fund recipient. The original complaint is listed below:

Date/Time: 11/30/2016 3:14 PM
First Name: Patricia
Last Name: McCoy
Email Address: pmccoy211@gmail.com
Who is the Complaint Against? Armand Houle Jr.
Date Violation Occurred: July 15, 2013
Location of Violation: 6367 Topaz Court, Port St. Lucie, Florida
Witnesses: Patricia McCoy
Armand Houle, jr. received Florida Hardest Hit Funds to apply to 6367 Topaz Ct., Port St. Lucie, Fl on April 9, 2013. On July 15, 2013 he rented 6367 Topaz Ct., Port St. Lucie, Fl to Victor Soomar who has lived there ever since. Mr. Houle moved to 183Prospect St., Bristol, Ct after renting the house in July, 2013. The
Specific Allegations: County of St. Lucie, Fl. is now billing Mr. Houle for back homestead exemption taxes from 2013 until now as he claimed homestead in Florida while living permanently in Connecticut. Armand Houle now has 6367 Topaz Ct., Port St. Lucie Fl up for sale.
On December 1, 2016 the lease and hardest hit funds from the Florida Circuit will be faxed to you.
How may we contact you?

The OIG initiated an investigation based on the information provided.

ALLEGATIONS

It is alleged that Armand Houle allegedly committed fraud by failing to notify his HHF advisor that he had leased his primary residence, during a time period of receiving HHF Program funds. The 2011 HHF Advisor Guide and the HHF Program loan documents require applicants to occupy the property indicated on their HHF application as their primary residence. If supported, the allegation would constitute a violation of federal and/or state laws, including:

- Title 18, United States Code, §1001, False Statements;
- Section 817.034, Florida Statutes (F.S.), Making false statement to obtain property or credit;
- Section 817.545, F.S., Mortgage Fraud; and/or
- Section 837.06, F.S., False Official Statements.

EXECUTIVE SUMMARY

From November 30, 2016, to February 7, 2017, the OIG staff conducted interviews and reviewed significant documentation/records as it relates to the allegations. As a result of the investigation, OIG staff determined that the allegation of fraud against Mr. Houle, who failed to notify his advisor that he had leased his primary residence during a time period of receiving HHF Program funds, was **Supported**.

COMPLAINANT INTERVIEW

The complainant did not provide a telephone number, but provided an email address. Therefore, in an email dated December 1, 2017, OIG staff attempted to contact Ms. McCoy. On December 5, 2016, OIG staff received approximately 23 pages (Exhibit 1) via the U.S. mail pertaining to Mr. Houle. The envelope did not have a return address, but contained two typed pages, with one addressed to the Inspector General. The other typed page provided details about incidents of domestic violence and concluded with "sincerely Kimberly Mace Houle," but did not provide any contact information. Therefore, on December 5, 2016, OIG staff sent a follow-up email acknowledging receipt of the documents to the original complainant's email address.

Details from the letter addressed to the Inspector General reiterated the information provided in the original complaint and some of the documents received are listed below:

- HHF Program funding documents signed by Mr. and Mrs. Houle in 2012;
- A Power of Attorney (POA) dated March 2, 2013, in which Mrs. Houle appointed Mr. Houle as her attorney-in-fact;
- A Quit Claim Deed dated March 13, 2013, in which Mr. Houle removed Mrs. Houle from the Deed for 6367 NW Topaz Ct.;
- A lease agreement for 6367 NW Topaz Ct. signed by Mr. Houle and Victor Soomar, as the tenant, for the time period of July 15, 2013 to July 15, 2015, along with a renewal of the lease from July 15, 2015 to July 15, 2016;
- A document which shows that the home on 6367 NW Topaz Ct. has been listed for sale since November 10, 2016; and
- Mr. Houle's Florida vehicle registration as of September 6, 2016, which listed his mailing address as 183 B. Prospect St., Bristol, CT. 06010.

Note: The other documents received pertaining to Mr. Houle included an Internal Revenue Service Information Referral form, along with documents which provided brief details about incidents of domestic violence, and a traffic violation. These documents are included in Exhibit 1 for further review. However, such incidents are not within the purview of the OIG.

On January 30, 2017, the Legislative Office of Florida Housing forwarded an email from Senator Bill Nelson's office to OIG staff, which contained Kimberly Houle's contact information and her explanations listed below:

Case Details

Please briefly explain your problem. (In writing, provide my office with a detailed account. Include any additional relevant correspondence that you have initiated or received concerning your problem.)

My husband Armand Houle and I recieved a Florida Housing Finance Loan on 02/22/2012 an MLRP for 18,00.00 I Kimberly signed this note Armand Houle obtained Power Attorney over me under Dureas I was in jail Armand has had me falsely arrested in past and is violent. I signed POA on 03/12/2013 Armand then on 03/13/2013 removed from the Deed to our marital home. I started researching Armand in 03/2016 I then found that Armand Houle received another FL HHF Loan on 04/09/2013. The loan I believe is a MLRP to pay monthly mortgage payments for unemployed. This is the same loan # 7883 and is a Mortgage And Loan Modification Agreement Amended note and has counter parts 10 that state . This Modification Agreement may be executed in counterparts, originals, no of which needs to contain original signatures of all parties herto, but all of which together shall constitute one and the same instrument. I cant get a Mortgage Loan on a property that Armand removed me from Deed. The note also states owner must occupy as property FL HHF states you rent property fraud. Armand Houle rented 6367 NW Topaz CT Port St Lucie on 06/15/2013. Armand also owes 5,289 Homestead penalties I reported fraud and didnt claim income on taxes. I reported this to FL HHF email report fraud on 12/03/2016 and sent copies priority mail POA, Quit Claim, Lease they did receive them as this is Mortgage Fraud for

Please state how you would like Senator Nelson to help you.

profit and IdentityTheft note state borrowers are indebted 42,000.00 How and why as by FL HHF rules he was not eligible for funding as he had it less than 24 months prior also states must be current on first mortgage in prior 24 months and can not be more than 60 days late on first mortgage. I cant call FL HHF AS # does not work Armand threatened me with VOP that I reported to PO as he did joint tax returns .FL HHF has done nothing and Armands First mortgage provider took trap funds and knows he rented property has sent refinance offers to him in CT Ditech account [REDACTED] and he has spoken to them on the phone they tell him should charged more for rent. These action are what caused the melt down. Does my being in jail give Armand the right to commit mortgage fraud and include me in his crimes? FL HHF is clearly ignoring his fraud as he has property for sale hoping this will be swept under the rug good people needed this funding and did not receive it lost their homes Armand gets 2 fundings and free mortgage payments plus 1200 per month rent? Dear Bill I am asking you to investigate this matter with FL HHF as I have tried in vain to get a response from them and I will be reporting Armand Houle for Identity Theft as he faxed copies of our FL Driver License to FL HHF for application I found them. I fell Armand should profit anything more from sale of this Property be put in Forfeiture to pay IRS, Taxes and Restitution should be paid and proceeds from sale should go to Tarp to help the people in need. Thank You Sir. *Kimberly Houle*

In an email dated January 30, 2017, OIG staff acknowledged receipt of the additional information from Senator Nelson’s office and requested Mrs. Houle call to further discuss her concerns. On February 2, 2017, OIG staff received a telephone call from and conducted a recorded telephone interview of Mrs. Houle, who stated the following (paraphrased):

- She confirmed that she had a friend, Patricia McCoy, file the original complaint, and she provided the documents to the OIG;
- She also confirmed all of the details reported above pertaining to Mr. Houle:
 - They occupied the residence during the initial HHF Program funding time period;
 - After October 25, 2012, she no longer resided at the residence due to being incarcerated for approximately eight months in the St. Lucie County Jail (until June 2013);
 - While she was incarcerated, she signed a Power of Attorney for Mr. Houle to be her agent in March 2013;
 - He filed a Quit Claim Deed to remove her name from the deed to the property the next day;
 - When she was released from incarceration in June 2013, she never returned to the property because Mr. Houle threatened her with trespassing and that he would report her in order to violate her probation;
 - She was aware he moved to Connecticut in June 2013 and that he has been renting the property since that time;
 - When she recently determined Mr. Houle had received additional HHF Program funding in 2013, she had concerns that he may have included her in the application process and signed her signature on documents in order to apply for/receive additional HHF Program funds;
 - She expressed concerns for her safety because Mr. Houle has been physically violent to her and has verbally threatened her in the past;
 - She has notified her probation officer of her concerns and he encouraged her to report Mr. Houle for renting the property while he was receiving HHF Program funds; and
 - They are still married and she has consulted with an attorney about the situation.

OIG staff reminded Mrs. Houle to also contact local law enforcement if needed for her safety.

Note: In the information Mrs. Houle provided to Senator Nelson’s office, she stated:

- “I reported this to FL HHF email report fraud on 12/03/2016 and sent copies priority mail. . .”;
- “I can’t call FL HHF AS # does not work. . .”;
- “FL HHF has done nothing. . .”;
- “FL HHF is clearly ignoring his fraud. . .”; and
- “Dear Bill I am asking you to investigate this matter with FL HHF as I have tried in vain to get a response from them. . .”

Below is a summary of the correspondence received and OIG staff’s attempts to respond based on the contact information provided:

Date	Correspondence Received	Sender & Contact Information Provided	OIG Response & Results
11/30/16	Complaint via HHF Report Waste/Fraud/Abuse	Patricia McCoy pmccoy211@gmail.com	Email sent 12/1/16 – to pmccoy211@gmail.com No response
12/5/16	Documents received via US mail - 23 pages	No sender name, return address or contact information provided	Email sent 12/5/16 – to pmccoy211@gmail.com No response
1/30/17	Complaint forwarded from Senator Nelson via email	Kimberly Houle kimberly.houle@yahoo.com 386-837-1288	Email sent 1/30/17 – to kimberly.houle@yahoo.com On 2/2/17, Mrs. Houle called OIG staff

DOCUMENTATION/RECORDS ANALYSIS

OIG staff conducted reviews of the documents associated with Mr. Houle's HHF Program funding, which included: the HHF Program files on the Counselor Direct (CD) database, the HHF Program loan eligibility determination documents, and the HHF Program loan documents (Loan # 7883), with details listed below:

- On January 6, 2012, Mr. and Mrs. Houle signed the HHF Program loan eligibility determination documents (Exhibit 2) certifying:
 - 6367 NW Topaz Ct. was their primary residence;
 - To always provide honest and complete information to his HHF Advisor, whether verbally or in writing;
 - To contact the HHF Advisor about any changes in their situation immediately;
 - They understood and acknowledged that Florida Housing, the HHF Advisor, and/or its agents may investigate the accuracy of their statements, may require them to provide supporting documentation, and that knowingly submitting false information may violate Federal and/or state law;
 - That their property was owner-occupied and their primary residence was not vacant, condemned or rented;
 - In the Hardship letter, Mr. Houle stated, "... unemployed (sic) for 14 months no job in site yet trying to keep my home for my family. st lucie county florida, hit very hard. looking for work out of area or out of state if need be. . .";
- On February 22, 2012, Mr. and Mrs. Houle signed the HHF Program Loan documents (Exhibit 3¹), certifying:
 - They understood the terms of the loan, which included explanations about default, their responsibilities/liability, and that the "Borrower must occupy the Property at all times as the Borrower's primary residence."
- Between April and October 2012, Mr. and Mrs. Houle received six months of HHF Program funding. During that time period Mr. Houle provided information and explanations in the required "Monthly Touches" to his HHF advisor, which are listed below by date:
 - On April 10, 2012, he provided the following explanation about his employment hardship:

Hardship Letter # 0655437362	
To whom it may concern	
update	Still unemployed out of work looking for work, may have to go out of state to work. Family of four at home 2 kids in 7 th grade school. No other income to support family. Recieveing \$275.00 a week every 2 weeks from unemployment only to cover all home utilities in the home and auto repairs ECT.
Armand Houle jr	04/10/2012
Kimberly A Houle	04/10/2012

- On May 6, 2012, he explained:

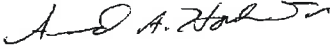
Hardship Letter # 0655437362		Page 1 of
Hardship Letter # 0655437362		
To whom it may concern		
1. update	Still unemployed out of work looking for work, may have to go out of state to work. Family of four at home 2 kids in 7 th grade school. No other income to support family. Recieveing \$275.00 a week every 2 weeks from unemployment only to cover all home utilities in the home and auto repairs ECT.	
Armand Houle jr	05/06/2012	
Kimberly A Houle	05/06/2012	

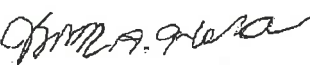
¹ Exhibit 3 also contains a summary of the certifications made by Mr. and Mrs. Houle on the HHF Program Loan documents.

- On June 11, 2012, Mr. Houle provided copies of his bank statements, which showed transactions were being conducted in Connecticut from May 4 – 25, 2012, and he explained:

To whom it may concern

Update
 I am Working now in Connecticut not Florida where my wife and 2 kids are home. I am living with my sister paying her \$100.00 a week to stay with her. Still paying the bills and living expenses for all of us. My pay by the hour is \$15.00 and that is for a forty hour week for a total of \$600.00 each week. My wife is not working still so there isn't any help from her.


Armand Houle jr 06/11/2012 


Kimberly A Houle 06/11/2012 

- On July 14, 2012, he provided the same explanation as listed above.
- On November 2, 2012, Mr. Houle stated:

To Whom It May Concern

Update:
 I was working out of state in Connecticut for calco construction 321 main st farmington CT. 06032 from April 1 2012 to October 26 2012 last day of work. I was laid off do to lack of work and respected to come back full time in the month of March 2013 back to CT. I am now in Florida seeking work and lay off from my job. I have 2 children at home ages 13 and 14 years of age in school now I am caring for.

Armand Houle jr 11/02/2012 

Kimberly Houle 11/02/2012 

Note: This document was signed during the time period of Mrs. Houle's incarceration.

- On March 12, 2013, Mr. and Mrs. Houle signed an additional Authorization for Release of Information and provided documents in support of additional HHF Program funding (Exhibit 4), which showed he:
 - Was laid off due to lack of work from his job in Connecticut (CT) on October 26, 2012;
 - Was receiving unemployment compensation from the State of CT; and
 - Was expected to work again in March 2013.

Note: This document was signed during the time period of her incarceration and on the date that Mrs. Houle signed the POA. However, Mr. Houle does not indicate Mrs. Houle's signature was executed with reference to the POA.

- On April 8, 2013, the HHF Advisor sent an email to HHF Program Managers, who approved the request to not require Mrs. Houle to sign the documents due to the domestic situation and her incarceration:
 - Mr. Houle explained that Mrs. Houle would not be returning home "for a year or more" due to her incarceration; and
 - The fact that she was no longer on the deed as evidenced by the supporting documentation (Exhibit 5), which consisted of the same POA and the Quit Claim Deed, which Mrs. Houle provided to the OIG.

- On April 9, 2016, Mr. Houle signed the HHF Approval Letter and the HHF Program Note, Mortgage and Loan Modification Agreements (Exhibit 6) making the same certifications as he did on the previous loan document, which included he:
 - Would continue to own and occupy the property; and
 - Understood the terms of the mortgage and that the HHF Program benefits had been expanded.

The OIG staff also conducted the following additional activity associated with Mr. Houle and 6367 Topaz Ct.:

- Searches of the Saint Lucie County Property Appraiser’s (SLCPA), the Saint Lucie County Tax Collector’s Office, and the Saint Lucie County Clerk of the Court’s websites which showed:
 - On June 13, 2003, Mr. and Mrs. Houle purchased the property;
 - From 2003-2013, they received Homestead Exemption on the property;
 - The Quit Claim Deed was recorded, removing Mrs. Houle from the deed in March 2013; and
 - Mr. Houle has been assessed Homestead Exemption penalties for 2014, 2015 & 2016, which are listed below:

Pay All Homestead: \$5,269.50		
2016	2015	2014
\$2365.51 due	\$1621.83 due	\$1282.16 due

Note: In accordance with Section 20.055(7)(c), F.S., which requires the OIG to conduct, supervise, or coordinate other activities carried out or financed by that state agency for the purpose of promoting economy and efficiency in the administration of, or preventing and detecting fraud and abuse in, its programs and operations, OIG staff contacted a representative of the SLCPA due to the issues related to Homestead Exemption. The representative said they could not provide details about their review of the matter, because of privacy issues, but that the Homestead Exemption penalties are listed on their website. In addition, searches of the Clerk of Court’s website showed that a tax lien (Exhibit 7) for the amount listed above has been placed on the property and Mr. Houle, who “erroneously claimed homestead.”

- Searches of 6367 Topaz Ct. on the real estate website Zillow (www.Zillow.com) revealed that the property has been listed for sale from November 12, 2016 to present (Exhibit 8).
- Review of reports from the Consolidated Lead Evaluation and Reporting (CLEAR)² database, revealed:
 - Mr. Houle initially reported the address in Connecticut as a household on January 1, 2013:

183 PROSPECT ST APT B	Utility Listing	10/01/2013 - 10/16/2016
BRISTOL, CT 06010-6353	Phone Record	07/22/2007 - 10/01/2016
HARTFORD COUNTY	Household Listing	01/01/2013 - 03/31/2016
Phone: (772) 408-0842	TransUnion	09/01/2013 - 10/23/2013
Phone: (772) 621-7317	Experian	07/14/2013 - 10/06/2013

- Mr. Houle’s tenant, Victor Soomar, reported 6367 Topaz Ct. as his household on January 1, 2012:

Possible Addresses Associated with Subject		
Address	Source(s)	Reported Date(s)
1) 6367 TOPAZ CT NW	Phone Record	06/19/2013 - 08/01/2015
PORT SAINT LUCIE, FL 34986-3822	Household Listing	01/01/2012 - 06/30/2014
SAINT LUCIE COUNTY	Experian	06/11/2014 - 06/11/2014
Phone: (954) 987-2310	Experian Gateway	06/11/2014 - 06/11/2014
Line Type: Residence	TransUnion	08/01/2013 - 09/06/2013
	Utility Listing	07/15/2013 - 07/22/2013

² Consolidated Lead Evaluation and Reporting (CLEAR) is a public records search platform, designed specifically for government and law enforcement use.

Based upon the documents reviewed, a timeline of activity (Exhibit 9) was created. A portion of this timeline is listed below regarding Mr. Houle vacating the property while still receiving HHF program funds.

Timeline of Activity - Armand Houle OIG Case #161130-01	
3/12/13	Mrs. Houle executed a Power of Attorney (POA) dated March 2, 2013, in which Mrs. Houle appointed Mr. Houle as her attorney-in-fact. The notary used Mrs. Houle's inmate wrist band as a means to identify her.
3/12/13	Mr. Houle provided his HHF Advisor with signed HHF Program documents including Mrs. Houle in order to receive additional HHF Program funding
3/13/13	Mr. Houle filed a Quit Claim Deed as Ms. Houle's POA and removed her from the Deed on 6367 NW Topaz Ct.
4/19/13	\$5,218.74 MLRP reinstatement payment. Member notes: "Please see the notes regarding co-borrower. This is a domestic situation and co-borrower was not required to sign documents."
6/1/13	\$740.82 monthly UMAP payment
6/6/13	Last date of incarceration in the St. Lucie County Jail for Mrs. Houle, who reported she did not return to the home due to the circumstances along with the fact that she was transported to and admitted to Counseling Recovery in Fort Pierce, FL.
6/14/13	Lease agreement signed between Mr. Houle and Mr. Soomar for 6367 NW Topaz Ct.
7/1/13	\$740.82 monthly UMAP payment
7/15/13	First date of lease for Mr. Soomar to occupy 6367 NW Topaz Ct. as a tenant
8/1/13	\$740.82 monthly UMAP payment
9/1/13	\$740.82 monthly UMAP payment
9/13/13	Mrs. Houle was released from the Counseling Recovery treatment program.
10/1/13	\$740.82 monthly UMAP payment
11/1/13	\$740.82 monthly UMAP payment
2014, 2015, & 2016	Mr. Houle has Homestead Exemption penalties with a total balance due of \$5,269.50
11/12/16	Mr. Houle listed 6367 NW Topaz Ct. for sale
Note: Mr. Houle received HHF Program funding totaling \$9,663.66 during 2013.	
Color Key	
SLCPA homestead exemption information	
HHF Program payments	
HHF Program and HHF Advisor activity (application/loan documents, along with monthly and quarterly touches)	

WITNESS INTERVIEWS

On December 27, 2016, OIG staff conducted a recorded telephone interview of Victor Soomar, Mr. Houle's tenant, who stated the following (paraphrased):

- He and his son, Christian Soomar, have rented 6367 NW Topaz Ct. from July 15, 2013 until present;
- He thought Mr. Houle moved out just before they moved in;
- He deposits the rent payments in Mr. Houle's bank account; and
- They have extended their lease for another year.

Note: On January 6, 2017, OIG received another complaint regarding Mr. Houle renting his home during HHF Program funding, which is listed below:

Who is the Complaint Against?	Armand Houle
Date Violation Occurred:	2013 to 2017 still rented
Location of Violation:	6367 NW Topaz Ct Port St Lucie FL 34986
Witnesses:	House is rented and for sale and has 2 HHF Loans that state owner must occupy on St Lucie county clerk of the Court.
Specific Allegations:	1 St Loan on 02/22/2012 2nd Loan on 04/09/2013 HHF rules state mortgage must be paid for 24 months prior to 2nd funding. Owner got funding 10 months early and rented house. Moved out State FL . Owner also has Homestead penalties for fraud on St lucie county tax assessor. of 5,269.00 for 3 years. loans also state tax can not be delinquent.

On January 9 and 31, 2017, OIG staff attempted to contact this complainant via email, but received error messages stating that the email was not found or the mailbox was unavailable.

FLORIDA HOUSING MANAGEMENT REVIEW

On December 1, 2016, OIG staff contacted a HHF Program manager, who provided the following details about provisions and requirements for repayments of the HHF Program funds (paraphrased):

He should have been occupying the home as his primary residence while receiving HHF Program funding and would owe from the date he moved out.

Note: Due to the property being listed for sale, OIG staff also notified the Florida Housing Payoff Section about the complaint and the possible sale of this property. On February 7, 2017, Mrs. Houle called OIG staff and stated Mr. Houle has a contract to sell the home. An additional search of Zillow shows that the home is off the market, with the listing removed on February 6, 2017.

SUBJECT INTERVIEWS

On January 13, 2017, OIG staff called Mr. Houle, who declined to conduct a recorded telephone interview, but stated the following (paraphrased):

- His actions were not intentional;
- He had to leave Florida to find work;
- His wife was not working and was incarcerated for part the time;
- It was either rent the house or give it back to the bank;
- It was his intent to save his home; and
- He was going to consult with an attorney to address this matter.

Mr. Houle had the contact information for the OIG staff and was encouraged to contact or have his attorney contact the office to continue the interview. To date, OIG staff has not been contacted by Mr. Houle or an attorney representing Mr. Houle.

ADDITIONAL ISSUES

Based on information obtained during this investigation, the following issue was further reviewed:

As previously reported above, Mrs. Houle expressed concerns about Mr. Houle including her in the application for the additional HHF Program funding he received in 2013. Therefore, after Mrs. Houle was interviewed, OIG staff reviewed the documents submitted by Mr. Houle during the time period of her incarceration from October 25, 2012 until June 2013.

Three documents (Exhibit 10) were identified with signatures from Mrs. Houle during this time period. Two of the documents were HHF Program Authorization for Release of Information forms, which were dated November 2, 2012 and March 13, 2013. The other document was a HHF Hardship Letter, which was included in the Document/Record Analysis section above, with notations about the timeframes of the signature. In emails dated February 1 and 6, 2017, OIG staff provided the documents to Mrs. Houle, who reviewed them and provided the following response via email and phone conversation on February 7, 2017 (paraphrased):

. . . none of the signatures are mine. The hardship letter is for 11/02/2012 and time is 1152 pm. The authorization signatory page is not my signature and is dated 11/02/2012. I was arrested on 10/24/2012 and there were orders for no contact. I have sent you the signatory page for 02/22/2012 HHG note (Exhibit 11). You can clearly see this is not my signature on these documents. . . I was arrested on 10/24/2012. I was released from St. Lucie County Jail on 06/06/2013 and the sheriffs transported me to Counseling Recovery located at 4753 Orange Ave Fort Pierce, FL 34947. I was released from there on 09/13/2013.

Mrs. Houle was also notified that her signature was not required on the actual HHF Program loan documents for the second funding time period because Mr. Houle had requested and was not required to have her sign these HHF Program documents based on his explanations, the POA, her removal from the deed, and her incarceration.

Note: Mr. Houle submitted these documents to his HHF Program Advisor, with:

- Two in support of his original HHF Program funding in 2012;
- The second in support of his application for additional HHF Program funding in 2013; and
- Although Mrs. Houle signed the POA on the same date as Mr. Houle submitted the signed HHF Program funding documents, Mrs. Houle said she did not sign the HHF Program Authorization for Release of Information form and Mr. Houle did not reference the executed POA on the signature area of the form.

FINDINGS/CONCLUSIONS

It is alleged that Armand Houle allegedly committed fraud by failing to notify his HHF advisor that he had leased his primary residence, during a time period of receiving HHF Program funds. The allegation was **Supported** by: the documents provided by the complainant; the HHF Program application/loan documents; the Homestead Exemption penalty and tax lien, and by the testimony provided by Mrs. Houle, Mr. Soomar, and Mr. Houle that he had rented the property during the last portion of his HHF Program funding. Therefore, based upon these findings, Mr. Houle is in default of the terms of the HHF Program Loan because he failed to notify his HHF advisor that he had leased his primary residence during relevant times.

In accordance with Section 20.055(7)(c), F.S., on February 20, 2017, this investigation was coordinated with the Florida Department of Law Enforcement (FDLE) for a possible violation of federal and/or state laws, including:

- Title 18, United States Code, §1001, False Statements;
- Section 817.03, Florida Statutes (F.S.), Making false statement to obtain property or credit;
- Section 817.545, F.S., Mortgage Fraud; and/or
- Section 837.06, F.S., False Official Statements.

However, since coordinating this investigation, Mr. Houle has sold his home and on March 28, 2017, repaid the HHF Program \$6,956.68 which he attained fraudulently. As such, Florida Housing has decided not to press charges against Mr. Houle since he repaid the funds. Subsequently, on April 5, 2017, FDLE advised:

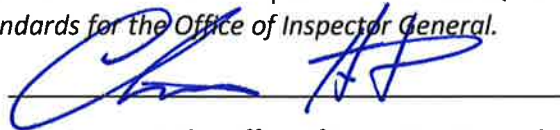
“since they [Florida Housing] are the victim and do not wish to press charges, we will be closing the case.”

INSPECTOR GENERAL COMMENTS

With the repayment of the HHF Program funds, the OIG does not have any additional comments or recommendations.

CERTIFICATIONS

This investigation was completed in accordance with accreditation standards established by The Commission for Florida Law Enforcement Accreditation and has been conducted in compliance with the “Quality Standards for Investigations” found within the *Principles and Standards for the Office of Inspector General*.



Name, Title, Office of Inspector General

APPROVALS

M. Yopp

Melanie Yopp
Investigator

4/10/17

Date

Chris Hirst

Chris Hirst
Inspector General

4/10/17

Date