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Office of Inspector General

Investigative Report

160205-01

April 22, 2016

Chris Hirst, Inspector General

Enhancing Public Trust in Florida's Affordable Housing

**Office of Inspector General
Investigative Report
Case Number 160205-01**

INTRODUCTION

On September 24, 2015, the Florida Housing Finance Corporation (Florida Housing) Office of Inspector General (OIG) received a copy of a letter (Exhibit 1) from the Office of the Attorney General (AG) to Veola Gould regarding her concerns about the processing of her Hardest Hit Fund (HHF) Program application. Ms. Gould stated she felt her advisor, Enrique Chirinos, HHF Administrator for the Hispanic Help Center (HHC), was not processing her HHF Program application due to his knowledge that she had filed complaints against him with the AG and Florida Housing.

Nicole Gibson, Assistant Director of Homeownership Programs, conducted a review of her HHF Program application file and provided an explanation pertaining to the processing of the file. In an e-mail dated September 24, 2015, Ms. Gould was provided this information and directed to continue to work with her advisor; and if she met the eligibility requirements, then she would receive assistance.

During the time period from September 24, 2015 to February 5, 2016, Ms. Gould sent two letters (Exhibit 2) to the OIG further expressing her concerns. In addition, Ms. Gould called Florida Housing several times and spoke to either Inspector General Chris Hirst or Ms. Gibson.

In an e-mail dated February 5, 2016, Ms. Gibson sent the following explanation to the OIG regarding concerns expressed by Ms. Gould about Mr. Chirinos:

Just wanted you to be aware of a complaint that Ms. Veola Grant (Gould in the Advisor Portal) has against her Advisor Agency, Hispanic Help Center. She is stating that Enrique of Hispanic Help center purposely delayed her application, mishandled the process, and has a bias towards her which delayed her approval for Hardest Hit Funds by 3 years. She is stating that if she was approved at the beginning, Wells Fargo would not have been in a position to deny funding for her because she would have been within the maximum amounts provided by Hardest Hit.

The OIG initiated an investigation based on the allegations provided.

ALLEGATIONS

Ms. Gould alleged that Mr. Chirinos:

1. Purposely delayed her application because of her complaints to the Attorney General's Office and Florida Housing;
2. Mishandled the process;
3. Has a bias towards her; and
4. These alleged actions by Mr. Chirinos delayed the approval for her HHF Program application by three years.

Additionally, Ms. Gould stated that if she had been approved at the beginning, Wells Fargo would not have been in a position to deny funding for her because she would have been within the maximum amounts provided by Hardest Hit.

EXECUTIVE SUMMARY

Ms. Gould started the application process for HHF Program funds on November 17, 2013, and was subsequently approved to receive HHF Program benefits. However, her servicer (Wells Fargo) objected to any HHF Program benefits on January 20, 2016, because she was unable to pay the difference over the program amounts.

From February 5, 2016, to April 1, 2016, the OIG conducted interviews and reviewed significant documentation related to the allegations. As a result of the investigation, the OIG determined that the allegations against Mr. Chirinos were Not Supported.

COMPLAINANT INTERVIEW

On March 14, 2016, the OIG conducted a telephone interview with Ms. Gould; her summarized testimony has been attached (Exhibit 3). Ms. Gould provided the following explanations related to her allegations (paraphrased):

Allegation # 1: Mr. Chirinos purposely delayed her application because of her complaints to the Attorney General's Office and Florida Housing.

Regarding how Mr. Chirinos behaved after learning about her complaint to the AG's office, Ms. Gould said she could not provide any evidence of him purposely delaying her file, but she stated:

- "He did worse, got worse with the delaying process";
- Mr. Chirinos told her on two occasions, "You have a very nice house, Veola, and I will see if I can help you";
- This comment did not make sense to her because his job was to gather the paperwork and send it to Florida Housing;
- She felt his purpose was not to gather the paperwork and send it in as soon as possible; and
- She felt he was trying to tell her, "I'm going to see if I can make you lose your home, in other words," but he did not say that directly to her.

Allegation # 2: Mr. Chirinos mishandled the process.

Ms. Gould stated:

- She feels like she provided all of the documents and did everything she needed to do to obtain help from the HHF Program;
- "Mr. Enrique did everything in his power to delay me and make sure I did not get it done, and that is why I'm putting in an investigation. So, that they can investigate the matter of what I have been through";
- "Mr. Enrique, what he did, he did it purposely, and there is no reason for him to do that to me because I spoke out and there is no reason for him to do that. He definitely was not doing what he was supposed to do and the Attorney General's Office was aware of that."

According to Ms. Gould all of the documents were in her file, but Mr. Chirinos claimed he did not receive the documents on time and he also questioned her residency. Ms. Gould stated:

That is something that I was not happy with. . . The thing is I have a driver's license for Florida. I have a deed for my house. It is in my name. I have bank statements from Florida that were given

to him. Everything that Mr. Enrique needed for proof of residency it was given to him. It's nothing that he was saying that's why he was delaying the process. He knew I lived in Florida. My daughter lives in New Jersey and I was working in New York in 2012, that's when after the storm, I lost my job. I was given unemployment in 2013, and all of that is written in letters to Mr. Enrique. It's not something I'm saying now and there's no proof of it. Do you understand?

Allegation # 3: Mr. Chirinos has a bias towards Ms. Gould.

Ms. Gould said that after she sent the letter to the Attorney General's office, Mr. Chirinos' comments and actions towards her made her feel that he was biased. Ms. Gould stated:

Those are some of the things that I explained to you. One is he is telling me about my home and it's like, I do not know what he wanted me to do to help me. He is saying he will see if he can help me. You know, I do not understand that. Why are you saying that? This is a government office and you know you are there to help homeowners who really needed help. At the time, I really needed the help. That's one of the things that I am looking at. I don't know if it was because I am not Spanish. I don't know, I'm just saying this to you. If I didn't get the help because of that. I don't know because he had my driver's license and I know he knew what I look like. You know, I definitely am not Hispanic. You know, so, I'm thinking all these different things up and putting into place an I'm saying he seems to be a biased person because he had my application and he was just playing around with it. He was not helping me.

Ms. Gould said Mr. Chirinos had not made any comments to her about her race/ethnicity. However, she said he asked for her nursing license status, which she reported as a licensed practical nurse (LPN). She said it appears to her that Mr. Chirinos feels because she is a LPN that she should be working. Ms. Gould said she was not sure what he was looking for, but she calls him biased because he appeared to her to be biased.

Ms. Gould stated her race/ethnicity is black. Ms. Gould acknowledged that Mr. Chirinos had not made comments about her not being Hispanic, but she felt he was biased and stated:

I sensed it because, you know, of his behavior because of the way he was behaving with me. It totally showed me that Mr. Enrique did not want to assist me. In other words, from the beginning he did not want to assist me and I know that one of the things that he was upset about was that, which I knew and recognized, is because I sent the letter out to the Attorney General's Office about him.

According to Ms. Gould, Mr. Chirinos told her that she was not going to get the loan approved. She explained a tax preparer had listed her daughter on her taxes, but she had told Mr. Chirinos that her daughter had moved out of her home. She said Ms. Gibson became involved and directed her to send a letter with an explanation and the address of where her daughter was living.

Allegation # 4: These alleged actions by Mr. Chirinos delayed the approval for her HHF Program application by three years.

According to Ms. Gould, Mr. Chirinos was repeatedly asking for the same information. She said one example was his requests for the reason for her employment termination in December of 2014. She said she provided this information to him in January of 2015, but he was still requesting it in December of 2015. She said, "I lost my job because I was not getting enough days to work." She said she made Ms. Gibson aware that this was the third time he requested this information. Ms. Gould said, "Some things he would put in and some he would not give in to the Housing." She also said it was "very frustrating" because she felt he was repeating the requests numerous

times and she sent the letter to the Attorney General's Office to let them know that he was wasting time. Ms. Gould said she was really looking for help because she did not have any other income or anyone supporting her. She also said she feels she was turned down by the bank due to the delays caused by Mr. Chirinos.

Additional Comment: Additionally, Ms. Gould stated that if she had been approved at the beginning, Wells Fargo would not have been in a position to deny funding for her because she would have been within the maximum amounts provided by Hardest Hit.

Regarding loan approval, Ms. Gould said she remembered in late November 2015 she spoke to Ms. Gibson who said the loan was approved, but she (Ms. Gibson) was not sure whether the bank would accept it. Ms. Gould said she wondered why Ms. Gibson would mention that. Ms. Gould stated:

When they turned it down, I realized what happened is she explained to me that within 18 months (sic). What she said is that it is on the application, but you know this is the first time, I was trying to get this help from HHF. I was not aware that 18 months is the period of time to apply for the loan. I think that is what Ms. Gibson was trying to say to me; and as you know this application, this process went on for over two years. November 2015 was two years.

Regarding lenders making the determination whether to accept HHF Program funding, Ms. Gould said she did not know that and stated:

This is one of the things that I'm say where Mr. Enrique, knew very well because this is his job. He is the administrator of the HHF. I would think he would know exactly what the lender does. How much they would accept because Ms. Gibson said that \$21,000 would be for one year when she was not working. If everything was worked out the way it should have been. . .

According to Ms. Gould, she feels Mr. Chirinos should have been familiar with this type of situation and stated, "I looked at all angles and realized that Mr. Enrique just wanted to hold me back to see that I did not get this loan and that is why I call him biased."

WITNESS INTERVIEWS

Between February 16, 2016 and March 14, 2016, the OIG interviewed the following Florida Housing staff members:

- Lynn Brady, HHF Analyst;
- Nicole Gibson, Assistant Director of Homeownership Programs; and
- Cecka Green, Communications Director.

Their responses to the allegations have been summarized and attached (Exhibit 4), with pertinent parts listed below by allegation:

Allegation #1 - Ms. Gould alleged that Mr. Chirinos purposely delayed her application because of her complaints to the Attorney General's Office and Florida Housing.

- **Ms. Brady stated**, "I did not see any indication of that. . ."
- **Ms. Gibson stated**, "I saw nothing in the file that gave me any kind of pause that he was doing anything inadvertently to her file. . ."

- **Ms. Green stated:**

So, we have lots of applicants that will go that route and say that it was deliberate because the advisor does not like them; and it is odd because most of the time the advisors have never seen any of the applicants. Most of them are telephone applicants. . .

In this case with Ms. Gould's file, Ms. Green said she does not have reason to believe Mr. Chirinos was not contacting her. . .

Allegation #2 - Ms. Gould alleged that Mr. Chirinos mishandled the process.

- **Ms. Brady stated:**

That would be difficult. But I do know that he was in communication with me trying to work out when, according to him, she was not sending the documentation back. To see if there was anything else that we could use, but most of the time there were too many unanswered questions that felt that I could not approve the loan without knowing who was actually occupying the subject property and the source of income for the household. . ."

- **Ms. Gibson stated,** "I did not see anything in there that I think that he mishandled the process. This was just a hard case; and there were multiple hardships."

- **Ms. Green stated:** She spoke to Ms. Gould about a year ago. Ms. Green provided a copy of the related e-mail correspondence (Exhibit 5) and stated:

That's the first e-mail that I sent to Enrique. So, my e-mail says that I received two calls from Veola Gould asking about her application. I said I will call her back out of courtesy; however, I will not provide any status updates, which is our policy for the most part. She has been advised to she should be communication with your agency. Please have someone reach out to her to give the status of her application now that she has submitted the form you sent her; and I said 'You know you do not have to say it.' Basically what that eludes to is that it's been a little difficult trying to work with her given he repeatedly was asking for information and may have not been receiving it. From my memory, when I looked in the file, the file seemed to be very well documented with what he was asking her to submit, and it was not getting submitted or the questions she was asking. I just told him a short call to update her would be great. That would suffice. . .

Allegation #3 - Ms. Gould alleged that Mr. Chirinos has a bias towards her.

- **Ms. Brady stated:**

Again, because you know I would not have been a party to it. In his communications to me, I did not see that. I know that he felt she was very difficult to work with, because she was not getting the documentation back to him and saying that he said, 'I do not have.' But, I did not see any indication that there was anything else going on other than that he was trying to get her approved.

- **Ms. Gibson stated:** she felt that the allegations were not valid and stated:

I think all of the documented evidence shows that he was trying to get her approved and going through the process. I do not think that there was anything else that could be done or handled any differently. They typically do not take that long. I think that he was trying to work with her to the best extent possible. I really do.

- **Ms. Green stated:**

Now, I have spoken with so many applicants. There have been some claiming that the advisors are biased against them, but I do recall having a conversation, which could have been with her or may have been with someone else. I do remember saying, 'No, I don't think that is correct. Advisors are here to help. As you can tell, Enrique is Hispanic. So, I doubt seriously that he is biased against or for you for that matter, given what you told me. I'm going to ask you to suspend that thought and let's just get him the information that he needs – so that you can get moving.'

Allegation #4 - Ms. Gould stated that these alleged actions by Mr. Chirinos delayed the approval for her HHF Program application by three years.

- **Ms. Brady stated:**

Well, as in the majority of files, time is of the essence. There was so much lag time between when we were requesting documentation and when we actually got what we requested back. I feel that if we could have gotten everything back in quicker, we could have gotten it resolved. I am not sure that would have made the outcome any different, but you know – we would have gotten the final answer sooner.

According to Ms. Brady, Ms. Gould was approved to receive HHF Program funds on December 9, 2015.

- **Ms. Gibson stated:**

From my opinion, she did not have an eligible hardship to begin with. She couldn't prove that she was here living in her house here in Florida at the time. Because it appeared that for all intents and purposes that she was in New Jersey; and there were questions with other household members living here in Florida. When we were finally able to get her approved it was a difficult file to work. Obviously there's lots of stories being amended. Once we were able to get all of the documents together and approve her, it was not until the end of last year and the beginning of this year. It was just a difficult file.

Regarding responses or delays, Ms. Gibson stated:

There were constant, constant 30 days, where they would ask her for documents and the delays would go on. She [Ms. Gould] would say that she supplied it already, but a lot of times I think that clients get confused that you may think that you have supplied something, but it does not necessarily (sic). We ask you for a tax return, but it may not be the tax return that we are looking for. Or something along those lines. So, they think that they have supplied the information or it's been stale because this was gone on so long. Our source documents have to no older than six months old and you supply pay stubs, but that could have been two years ago. The delays and the way that it worked for her probably caused a lot of repeat.

- **Ms. Green stated:**

If all of the documents is saying New Jersey that can be a pretty significant hang-up. . . If residency is questionable, whether it's your primary residence that can be a significant hang-up because the onus is not on the advisor that you live there. It's not up to the advisor to prove that you live there. It's your [HHF applicant's] responsibility to prove that you live there as a primary residence. If your bank accounts are in New Jersey and all your documents are from New Jersey that would raise a flag as to whether you really live there. I'm not say that she is not being truthful, but the burden is on the applicant, not on the advisor. So, I think that puts him [Mr. Chirinos] in a precarious position.

Three years is a long time. So, the advisor is working on your file, there is something you need. So, he is going to go on to the next one and he is going to try to get through as many as he can. Then while I'm sure he has a note on your file, and is waiting on documents, he has to get back around to you, which is why we emphasize when we speak to people that when they ask you for that documentation, get it right back to them. Don't take three, four, five, six, seven days because that is moving your application into another place. You want to try to get it back to him or her right while it is right there in front of them. So, it is unfortunate, I do not know that it would be fair to say had she been approved in the beginning that is so subjective and depends on so many things.

Additional Statement: Ms. Gould stated that if she was approved at the beginning, Wells Fargo would not have been in a position to deny funding for her because she would have been within the maximum amounts provided by Hardest Hit

- **Ms. Brady stated,** "We don't stop" processing the applications, but continue, which is to the benefit of the applicant. . .

- **Ms. Gibson stated:**

. . . Unfortunately, it comes down to her servicer. If she had a different servicer, it may have (sic) that's beyond our control that Wells has the policy that they don't accept payments. To her thing, she has been working on and off too. I kind of talked to her about this as well, she did not do any – she has not been making her payments in forever. She has not done anything to try to save either when she has been making her payments. So, I talked to her and said, 'Even if you were approved back in 20__ , when you first started, where would you be now in the process? You would be in the same spot. You know, going down the same path because you still have not been making any payments on your own. . .

- **Ms. Green stated:**

To me, that is very subject because you are assuming that you had a perfect file, and you did not have the perfect file. There were questions there; and I think that is very subjective. I also have to question how far in arrears were you when the process started, how much was your mortgage payment. . .

SUBJECT INTERVIEW

On May 29, 2014, the OIG conducted a telephone interview with Mr. Enrique Chirinos, HHF Advisor, Hispanic Help Center. His testimony has been summarized and attached (Exhibit 6). Mr. Chirinos provided the following responses to the allegations reported by Ms. Gould:

Allegation # 1: Mr. Chirinos denied that he purposely delayed her application because of her complaints to the Attorney General's Office and Florida Housing; and he stated:

No, I think the notes will show that very clearly. We really kept at the case. We kept going to her and writing to her and writing to her. Insisting she send us what we needed. I do not think any difference can be found between before and after the calls to the Attorney General. You will see there was a constant effort to try to get the work done and to a completion. I'm sure that the same distance between notes before the Attorney General and kept the same pattern afterwards. I'm sure that the notes will show there was no change in patterns.

Allegation # 2: Mr. Chirinos denied that he mishandled the process; and he stated:

I think that to mishandle a case the process is that you have to show a lack of interest or a lack of effort. I think the effort is very well documented. I mean if I print out all the papers that have been going back and forth on the case to Veola, I am talking about three or four inches of thickness. So, I think that speaks for itself. All of the effort and communications back and forth. In e-mails and mail, trying to get this work done. I think I can sincerely say, I really wanted to help her and wanted to make it happen. It went to the very end. This case for us, let's be clear, has been a total waste financially. If she is ineligible we get \$75 and if she gets approved at best \$300. I don't think that was biased or something. It was hard work and we never left it. We never stopped trying. You ought to see that in the notes.

Allegation # 3: Mr. Chirinos denied that he has a bias towards Ms. Gould. Mr. Chirinos stated HHC offers programs open to all individuals; and he stated:

No, that's the thing. If we look at our statistics, a great percentage of our Hardest Hit Fund people are not Hispanic. So, I am getting the work done to find out a solution. . . When we were originally created by in 2008, we called our place the Hispanic Help Center because we were originally going to work with foreclosures in an area that is very Hispanic. . . but never the intention was to just work with Hispanics. We just understood that people were going to feel easier knowing that they were going to go to a Hispanic. But as time has evolved and we entered into the Hardest Hit Fund Program, we made sure to put into our website the fact that we are open to everybody. Because when we entered into the Hardest Hit Program, that opened the doors to attending not only Hispanic, but other ethnicities. We are absolutely, totally open to that and the same situation we have with HUD [Housing Urban Development]. We not only Hispanics (sic), we are open for everybody. That is how we show our service every time we apply for a grant for HUD.

Mr. Chirinos said he encountered the following issues while processing Ms. Gould's file:

- The technical issues such as:
 - Having documentation to verify her real name;
 - Having people that live with her and were on the mortgage, but then were not living with her;
 - Her banking information; and
 - Whether she lived in New Jersey or in Florida

- Ms. Gould's personality and he explained:
 - Phone conversations with her would usually last 45 minutes to an hour; and
 - They would listen to her complain before they could tell her what they needed from her.

Mr. Chirinos stated that these issues needed to be addressed in order to complete Ms. Gould's file. According to Mr. Chirinos, the communication log shows the underwriters kept asking to verify these issues and the sources of monies received.

DOCUMENTATION/RECORDS ANALYSIS

Between February 16, 2016 and April 1, 2016, the OIG and HHF Program Management reviewed and analyzed available documentary information to include, but not limited to:

1. Ms. Gould's HHF Program application file;
2. Member Notes from Ms. Gould's HHF Program application;
3. The HHF Advisor Procedure Manual;
4. The HHC website; and
5. Information about the Fair Housing Act [Sec. 800. [42 U.S.C. 3601 note]] provided by the United States Department of Housing and Urban Development (HUD).

Results of the reviews are list below:

Ms. Gould's HHF Program application file

As reported above, Ms. Gibson conducted a review of Ms. Gould's HHF Program application file on the Counselor Direct (CD) database. In an e-mail dated September 23, 2015, Ms. Gibson provided the following explanation pertaining to the processing of Ms. Gould's HHF Program application:

The advisor has put in very detailed notes as to the processing of this client's file.

At first, we questioned the fact did she really reside in FL when her original hardship occurred because the UW [unemployment wage] benefits were from NJ [New Jersey] and her bank statements and UW benefit statements all had a NJ address (she seems to have claimed she was just visiting her daughter).

Apparently, she had another layoff and did receive UW benefits from FL in 2015. She needed to update her entire application as everything was dated.

You can see from the notes that the advisor was repeatedly asking for documents and not receiving them.

We have had this file in Underwriting since January 20, 2014 so the advisor did try to send shortly after first receiving but there was so many problems.

Member Notes from Ms. Gould's HHF Program application file

A review of the Member Notes (Exhibit 7) associated with Ms. Gould's HHF Program application file showed Ms. Gould worked with the HHC on the processing of her HHF Program application during the time period of November 18, 2013 to January 4, 2016. The records also show that Mr. Chirinos:

- Worked with HHF Program staff to include underwriters in the processing of her file;

- Contacted Ms. Gould through telephone calls, e-mails, and letters;
- Notified Ms. Gould of the outstanding items needed for the processing of her file;
- Placed a note in the file on November 3, 2015, that she told him she was going to “senators and housing,” and he reported that he left her the following message, “We are waiting for underwriting to answer. I will notify you as soon as we have news from them. Good day Veola”;
- Made eight additional entries from November 3, 2015 to February 4, 2016, which show he was still working with Ms. Gould on the processing of her file; and
- Corresponded with Ms. Gould in a professional and polite manner as indicated by the copies of the letters and emails included in the notes.

Additionally, the Member Notes show a pattern of activity, where the HHC staff members reported that they were unable to reach Ms. Gould via the telephone during certain time periods. Furthermore, the Member Notes also show that her file was reopened several times, with examples of this activity listed below:

- In a note dated April 2, 2014, staff from the HHC reported that they called Ms. Gould and “left a message telling that the case has been reopen and reassign to an UW”;
- Between April 2, 2014 and June 13, 2014, the notes show HHC staff reported that they called Ms. Gould approximately nine times, left messages for her, but only spoke to her a couple of times; and
- In a note dated April 27, 2015, Mr. Chirinos stated:

I talked to client over the phone. She is upset of having to start over. I told her what u/w is requesting: to start over and to update the file; that she would need to provide a Debit Card printout with 60 day history. And that since it is past 4/15/15 Tax Returns with Wage and Income Transcripts will be required for 2014. She said she cannot sent it at this time because she is in vacation with her granddaughter. She will back in 2 weeks and then send me what u/w is requesting.

HHC Advisor Procedure Manual

According to the Eligibility Determination section of the HHC Advisor Procedure Manual (Exhibit 8), the requests for items by Mr. Chirinos, to include requests from by the HHC Program underwriters and staff, were in compliance with the guidelines of the manual.

HHC website

Some of the pages (Exhibit 9) of from the **HHC website**¹ were reviewed and provided information both in English and Spanish about the programs offered. According to the “About Us” page of their website, “The *Hispanic Help Center* is set out to to (sic) serve anyone who needs its services, particularly low income families, the disabled, and the elderly.”

Information about the Fair Housing Act [Sec. 800. [42 U.S.C. 3601 note] provided by HUD

HUD provided the following information related to Lending Discrimination²:

The Fair Housing Act protects people from discrimination when they are renting, buying, or securing financing for any housing. The prohibitions specifically cover discrimination because of race, color, national origin, religion, sex, disability and the presence of children. . .

¹ HHC website: <http://www.centrodeayudahispana.com/>

² US HUD website pages:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws/yourrights and
http://portal.hud.gov/hudportal/HUD?src=/topics/fair_lending

Discrimination in mortgage lending is prohibited by the federal Fair Housing Act and HUD's Office of Fair Housing and Equal Opportunity actively enforces those provisions of the law. The Fair Housing Act makes it unlawful to engage in the following practices based on race, color, national origin, religion, sex, familial status or handicap (disability):. . .

- Discriminate in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate.

Additional details provided by HUD³, are listed below regarding the Fair Housing Act:

Item 2.)What Is Prohibited?

In Mortgage Lending: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

FINDINGS/CONCLUSIONS

It is alleged that Mr. Chirinos: purposely delayed Ms. Gould's application because of her complaints to the Attorney General's Office and Florida Housing; mishandled the process; and has a bias towards Ms. Gould, which delayed the approval for her HHF Program application by three years.

The allegations were **Not Supported** for the following reasons.

1. Mr. Chirinos processed Ms. Gould's application under the direction of Florida Housing HHF Program underwriting staff and HHF Program management, who provided direction and oversight during the processing of Ms. Gould's application.
2. Mr. Chirinos and HHF Program underwriting staff processed Ms. Gould's application in compliance with the guidelines of the Eligibility Determination section of the HHF Advisor Procedure Manual.
3. Therefore, Mr. Chirinos' actions and those of the HHF Program staff were predicated upon management decisions facilitated in order to fulfill the requirements for processing Ms. Gould's HHF Program application and as such, were not as a result of Ms. Gould filing complaints against him or based on a perceived bias.

INSPECTOR GENERAL COMMENTS

The OIG recommends that this Investigation be closed. Ms. Gould will be provided a final copy of this report.

³ US HUD website page:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws/yourrights

CERTIFICATIONS

This investigation has been conducted in compliance with the "Quality Standards for Investigations" found within the *Principles and Standards for the Offices of Inspector General*.



Name, Title, Office of Inspector General

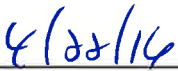
APPROVALS



Melanie Yopp
HHF Internal Investigator/Auditor



Chris Hirst
Inspector General



Date



Date