

OFFICE OF INSPECTOR GENERAL CITY OF JACKSONVILLE



REPORT OF MANAGEMENT REVIEW

EMERGENCY RENTAL ASSISTANCE PROGRAM

MATTHEW J. LASCELL
INSPECTOR GENERAL

JANUARY 17, 2024

DATE ISSUED

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”



OFFICE OF INSPECTOR GENERAL CITY OF JACKSONVILLE

MANAGEMENT REVIEW CASE NUMBER: 2023-0034

Matthew J. Lascell
Inspector General

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”

EXECUTIVE SUMMARY

In February 2023, the Office of Inspector General (OIG) reviewed the Emergency Rental Assistance Program (ERAP) enacted by legislation COJ Ordinance Code 2021-0156. While reviewing ERAP records, the OIG discovered there were various sub-recipients¹ responsible for administering ERAP and distributing ERAP grant funds (ERAP funds) to eligible households. The longest-standing primary sub-recipient throughout ERAP was Civitas, LLC (Civitas), based in Mount Pleasant, South Carolina (SC).

In February 2023, the OIG requested records from Civitas related to all fraud cases identified by Civitas. In March 2023, Civitas provided the OIG with records indicating that **nine** fraudulent counterfeit checks totaling **\$21,683.86** of ERAP funds were identified. Civitas reported these checks to Truist Bank and Mount Pleasant (SC) Police Department, but no further action was taken. The OIG discovered that Civitas failed to report these checks to the OIG, the City of Jacksonville (COJ), or Florida law enforcement agencies.

In March and April 2023, the OIG requested records from Civitas related to all fraud cases suspected and identified by Civitas, specifically involving fraudulent documents. In May 2023, the OIG also requested records from other sub-recipients related to (1) all fraud cases suspected and identified by the sub-recipients, (2) all fraud cases referred to law enforcement agencies by the sub-recipients, and (3) all checklists and guidelines used to determine the applicant's eligibility by the sub-recipients.

Based upon the information obtained, the OIG initiated a Management Review to determine whether the sub-recipients (1) provided ERAP funds in accordance with policies, procedures, and guidelines, (2) established anti-fraud prevention measures and identified fraud cases, and (3) reported fraud cases to the OIG, COJ, or Florida law enforcement agencies.

This management review will focus on the following sub-recipients' responses to the OIG's records request and any other notable concerns identified by the OIG: Civitas, LJD Jewish Family Children Services, Downtown Ecumenical Services Council, Beaches Emergency Assistance Ministry, Wealth Watchers Inc., and Catholic Charities Bureau Inc.

¹ A sub-recipient is defined as a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.

BACKGROUND²

In March 2021, COJ Ordinance Code 2021-0156 was enacted resulting in COJ (1) appropriating **\$28,920,070.08** of ERAP funds from the U.S. Department of Treasury to provide emergency rent and utility assistance to eligible households, (2) allowing a direct contract with United Way of Northeast Florida, Inc. (United Way) to distribute of ERAP funds for rental assistance through its 2-1-1 Program, and (3) allowing a direct contract with Civitas to provide supportive contractual services for ERAP, including Civitas' purchase of software, license and support services from Benevate, Inc. d/b/a Neighborly Software (Neighborly Software).

In March 2021, United Way contracted with COJ through City Contract No. 70940-01 to (directly and through its applicable subcontracts with partners) provide all services required to implement, oversee, administer, and manage the distribution of ERAP funds. In March 2021, Civitas also contracted with COJ through City Contract No. 70942-21 to provide COJ with technical assistance related to program design, program implementation, sub-recipient monitoring, quality control, financial management, and reporting. Further, Civitas was tasked with contracting with Neighborly Software to provide the necessary database software to manage ERAP.

In September 2021, COJ Ordinance Code 2021-0670 was enacted, resulting in COJ (1) appropriating **\$30,839,253.40** of ERAP funds from the U.S. Department of Treasury for the second phase of ERAP (ERAP 2) and (2) allowing a direct contract with Civitas for the distribution of ERAP 2 funds. In September 2021, Civitas contracted with COJ through City Contract No. 71358-21. Civitas' scope of services included providing technical, compliance, and operational support to COJ in the distribution of ERAP 2 and serving as COJ's authorized subcontractor for the use of the Neighborly Software for the administration of ERAP 2 and distribution of ERAP 2 funds.

In June 2022 and November 2022, COJ Ordinance Codes 2022-0370 and 2022-0864 were enacted, resulting in COJ reallocating **\$6,265,295.85** of ERAP funds from the U.S. Department of Treasury to provide emergency rent and utility assistance to eligible households, as Civitas continued to administer ERAP 2 and distribute ERAP 2 funds.

In March 2023, COJ Ordinance Code 2023-0148 was enacted, resulting in COJ reallocating **\$6,374,458.34** of ERAP funds from the U.S. Department of Treasury for the second round of ERAP 2 to provide emergency rent and utility assistance through the COJ Social Services Division of the Parks, Recreation, and Community Services Department and the Housing and Community Development Division of the Neighborhoods Department.

Overall, the ERAP funds could be used for payment of rent, rent arrears, utilities and home energy costs, utilities and home energy costs arrears, and other expenses related to housing incurred due, directly, or indirectly, to the COVID-19 outbreak. The ERAP funds also could be used to cover costs incurred by eligible households between March 13, 2020, and December 31, 2021, and could be applied to cover up to 12 months of rent and utility and home energy costs, including arrears, for an eligible household and could also be used to cover up to three months of prospective rent

² The Background section summarizes relevant COJ Ordinance Codes and City Contracts pertaining to this Management Review.

payments, subject to certain limitations provided in the Act³ and the availability of any remaining ERAP funds.

The Emergency Rental Assistance Program Eligibility Criteria (Criteria) were requirements used to determine household eligibility for receiving ERAP. Eligible applicants must be (1) a U.S. Citizen or Legal Resident Alien, (2) a resident of Duval County (including the Beaches and Town of Baldwin), (3) delinquent on the payment of rent, certain utilities and/or home energy costs due on or after March 13, 2020, and (4) part of an “*Eligible household*” as defined by the Act.

CIVITAS

Civitas’ Response to the OIG

In March and April 2023, the OIG requested records from Civitas related to all fraud cases suspected and identified by Civitas, specifically involving fraudulent documents.

In April 2023, Civitas responded, “*Where our in-take team suspected fraud the cases were denied. In most cases we asked for additional information and the applicants never responded therefore the applications were marked non-responsive. That being said, we did not keep a running list of suspected fraudulent applications (we received over 10,000 applications). Therefore, we would not be able to provide you with a list of suspected fraudulent cases.*”

From April 2023 through August 2023, Civitas provided the OIG with various cases of suspected and identified fraud that had not previously been reported to the OIG, COJ, or Florida law enforcement agencies. These referrals were comprised of Portable Document Format (PDF) files, including ERAP applications with signatures.

As a result of these cases not being previously reported to the OIG, COJ, or law enforcement, our office referred five fraud cases involving \$314,614.25 of ERAP funds to state and federal prosecutors for criminal prosecution.

The most notable fraud case involved a singular landlord (Landlord 1) associated with **49** submitted ERAP tenant applications. Of these **49** tenant applications, **13** were approved, resulting in Landlord 1 receiving ERAP funds totaling **\$217,389.25**. Of these **13** tenant applications, **nine** were paid by Jewish Family & Community Services (JFCS), **one** was paid by Downtown Ecumenical Services Council (DESC), and **three** were paid by Civitas before identifying the potential fraud and halting any additional payments, as shown below:

³ The Act is Section 501 of Division N of the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260 (December 27, 2020).

Subrecipients	Rent Assistance	Utility Assistance
Civitas	\$17,300.00	
Civitas	\$24,600.00	
Civitas	\$20,100.00	
DESC	\$15,100.00	
JFCS	\$9,600.00	
JFCS	\$7,200.00	\$542.91
JFCS	\$13,800.00	
JFCS	\$26,400.00	
JFCS	\$14,400.00	\$2,426.62
JFCS	\$14,400.00	
JFCS	\$9,075.00	\$1,344.72
JFCS	\$20,100.00	
JFCS	\$21,000.00	
Subtotal	\$213,075.00	\$4,314.25
Total	\$217,389.25	

Other Notable Concerns – Civitas’ Staff Size

According to City Contract records, Civitas’ staff was comprised of **eight** employees. Based on the OIG’s review, there are concerns that Civitas was unable to adequately provide the services in accordance with the terms and conditions of the City Contracts due to the size of their staff. Overall, Civitas was the longest-standing primary sub-recipient and served as COJ’s authorized subcontractor for the use of the Neighborly Software for the administration of ERAP 2 and distribution of ERAP 2 funds.

Other Notable Concerns – Civitas’ Address

According to City Contract and South Carolina Division of Corporations records, Civitas is located at 600 Salty Alley, Mount Pleasant, South Carolina 29464. Based on the OIG’s review, the OIG discovered that it is not a business address but a 4-bedroom, 3-bathroom, 3,086-square-foot single-family residence built in 1993. Further, this single-family residence was purchased by the Principal Owner and Lead Consultant of Civitas for **\$683,000** in March 2021, which is the same month that Civitas contracted with COJ through City Contract No. 70942-21.

Other Notable Concerns - ERAP Customer Data

According to City Contract records, Civitas was tasked with contracting with Neighborly Software to provide the necessary database software to manage ERAP. City Contracts B.19 Retention of Records/Audits states, “*Contractor must establish and maintain books, records, contracts, sub-contracts, papers, financial records, supporting documents, statistical records and all other documents pertaining to this Contract (collectively, the “Records”), in whatsoever form or format (including electronic storage media) is reasonable, safe, and sufficient.*”

In August 2023, Neighborly Software provided a Final Notice of Data Destruction to Civitas indicating that the Agreement between Neighborly Software and Civitas was terminated after ERAP was completed. As a result, Neighborly Software completed a final extraction of the ERAP customer data and provided it to Civitas in July 2023, and Neighborly Software would permanently delete this data in late August 2023.

In late August 2023, the OIG obtained the ERAP customer data in a raw data format through CSV/Excel files. The OIG discovered the data was illegible, and no PDF files related to ERAP applications with signatures were provided. As a result, the OIG could not complete any further historical investigations because the ERAP customer data was either permanently deleted or illegible for investigative purposes.

LJD JEWISH FAMILY CHILDREN SERVICES (JFCS)

JFCS' Response to the OIG

In May 2023, the OIG requested records from JFCS related to (1) all fraud cases suspected and identified by JFCS, (2) all fraud cases referred to law enforcement agencies by JFCS, and (3) all checklists and guidelines used to determine the applicant's eligibility by JFCS.

In May 2023, JFCS responded, “*All of the Duval county partners utilized a web-based portal called Neighborly to screen applicants and coordinate payments to landlords. We no longer have access to that portal so I'm unable to provide you with the specific criteria that had been requested of applicants and landlords during the initial review process. However, I have attached the application packet that we typically use for our clients requesting financial assistance. JFCS only made payments to landlords that had completed the review process in Neighborly along with their tenant. We never made payments directly to the tenants. None of the staff associated with ERAP have any recollection of denying a payment due to suspected fraud; however, they do recall some denials due to inaccurate or incomplete information.*”

Further, JFCS stated that the only possible fraud attempt they were made aware of involved Landlord 1.⁴ JFCS was unaware of this potential fraud until their involvement in ERAP ended, as Civitas had requested records associated with Landlord 1. Overall, JFCS stated that they did not report the matters related to Landlord 1 to any law enforcement agencies.

DOWNTOWN ECUMENICAL SERVICES COUNCIL (DESC)

DESC's Response to the OIG

In May 2023, the OIG requested records from DESC related to (1) all fraud cases suspected and identified by DESC, (2) all fraud cases referred to law enforcement agencies by DESC, and (3) all checklists and guidelines used to determine the applicant's eligibility by DESC.

⁴ According to ERAP records, JFCS dispersed ERAP funds totaling **\$135,975.00** to Landlord 1.

In June 2023, DESC responded, they had a suspected fraud case involving another singular landlord (Landlord 2) associated with **two** submitted ERAP tenant applications. Based on DESC's concerns, they requested additional documentation, including a notarized letter from Landlord 2.

In June 2021, DESC presented its concerns to United Way, but DESC did not receive a response from United Way before Landlord 2 inquired about the delay in processing their application. DESC stated they "*adhered to the broad guidance of the program to accept as accurate client and landlord attestations made on applications.*" As a result, DESC approved **two** tenant applications, resulting in Landlord 2 receiving ERAP funds totaling **\$56,000**.⁵

BEACHES EMERGENCY ASSISTANCE MINISTRY (BEAM)

BEAM's Response to the OIG

In May 2023, the OIG requested records from BEAM related to (1) all fraud cases suspected and identified by BEAM, (2) all fraud cases referred to law enforcement agencies by BEAM, and (3) all checklists and guidelines used to determine the applicant's eligibility by BEAM.

In May 2023, BEAM responded, "*BEAM did not experience any instances of fraud during our time as administrators of the ERAP. There was one situation where we found the documentation questionable, and referred that case to United Way to review. As staff have transitioned, I don't have any documentation of that application. BEAM requires at a minimum a picture ID, a lease, paystubs and utility bills for any clients requesting financial assistance. We write checks to landlords, not to the client. If the land lord is an individual, we review the property tax records on line to ensure the owner of the property matches the lease.*"

WEALTH WATCHERS INC. (WEALTH WATCHERS)

Wealth Watchers' Response to the OIG

In May 2023, the OIG requested records from Wealth Watchers related to (1) all fraud cases suspected and identified by Wealth Watchers, (2) all fraud cases referred to law enforcement agencies by Wealth Watchers, and (3) all checklists and guidelines used to determine the applicant's eligibility by Wealth Watchers.

In May 2023, Wealth Watchers responded, "*Wealth Watchers did not account for any possible fraud cases during the Emergency Rental Assistance program. We were not told to keep a record of any cases we may have denied due to fraud, or inconsistent information. We only have record of files that were paid.*" Wealth Watchers also stated that they received notification from a Jacksonville Sheriff's Office Detective informing them that the Detective was investigating an allegation of fraud. As a result, Wealth Watchers provided the Detective with information to support their investigation.

⁵ This case is **one** of the **five** cases that were not previously reported to the OIG, which the OIG has referred for criminal prosecution.

In June 2023, the OIG subsequently requested records from Wealth Watchers related to (1) their employees being instructed not to keep a record of any cases that may have been denied due to fraud or inconsistent information and (2) any explanations surrounding these circumstances.

In late June 2023, Wealth Watchers responded with ERAP guidelines provided by United Way. They noted that they (Wealth Watchers) were not required to keep any documents because all documents were submitted via the Neighborly System used for processing ERAP applications as per these guidelines.

CATHOLIC CHARITIES BUREAU INC (CCBJAX)

CCBJAX's Response to the OIG

In May 2023, the OIG requested records from CCBJAX related to (1) all fraud cases suspected and identified by CCBJAX, (2) all fraud cases referred to law enforcement agencies by CCBJAX, and (3) all checklists and guidelines used to determine the applicant's eligibility by CCBJAX.

In June 2023, CCBJAX responded in part, *"We not only followed the ERAP guidelines set forth but utilized CCBJAX policies and procedures as well. This gave us additional protection from those who intended on committing fraud. If a tenant or landlord could not supply us with the appropriate and required documentation, then they were immediately denied. Therefore, there were no suspected cases."*

FINDINGS

From March 2021 through March 2023, COJ appropriated **\$72,399,077.67** of ERAP funds from the U.S. Department of Treasury to provide emergency rent and utility assistance to eligible households in Duval County through various sub-recipients.

The OIG's review determined that COJ failed to adequately assess the sub-recipients to determine if they were able to provide the services in accordance with the terms and conditions of the City Contracts due to their staff size and physical location. COJ also failed to adequately monitor the sub-recipients' performance and maintain funds for record retention.

Further, the OIG determined that the sub-recipients failed to establish an adequate fraud detection system to identify cases of fraud. The sub-recipients also failed to report suspected and identified fraud cases to the OIG, COJ, or law enforcement.

RECOMMENDED CORRECTIVE ACTIONS

1. Update City Contracts to include the retention of PDF files, including those derived from subcontractors.
2. Allocate necessary funds for adequate record retention.
3. Directly contract with City Contractors for the purchase of software, license, and support services.
4. Require City Contractors to complete and provide proof of fraud detection training.

5. Require City Contractors to establish a fraud detection system.
6. Ensure City Contractors promptly report suspected and identified fraud cases to the City, OIG, and law enforcement agencies.

MANAGEMENT'S RESPONSE

The OIG provided the COJ Neighborhoods Department, Housing and Community Development Division an opportunity to submit a written explanation or rebuttal to the findings in this investigative report within ten (10) calendar days. Their response is attached to this report.

This report/review has been conducted in accordance with ASSOCIATION OF INSPECTOR GENERAL Principles and Quality Standards for Investigations.



A NEW DAY.

City of Jacksonville, Florida

Donna Deegan, Mayor

Neighborhoods Department
Housing Community Development Division
214 N. Hogan Street, 7th Floor
Jacksonville, Florida 32202
(904) 255-8200
www.coj.net

DATE: January 12, 2024

TO: Matthew Lascell, Inspector General
Office of Inspector General

FROM: Chiquita Moore
Operations Director – Neighborhoods Department

SUBJECT: Draft Report of Investigation
Office of Inspector General Investigation Number 2023-0034

Dear Mr. Lascell,

The Neighborhoods Department along with the Housing and Community Development Division (HCDD) would like to thank you for the opportunity to respond to Case Number 2023-0034 and clarify the distribution of the Emergency Rental Assistance (ERA) funding allocated to the City of Jacksonville through the United States (US) Treasury.

Since March 2021, the City of Jacksonville (COJ) has distributed nearly 70 million dollars in ERA funding to provide rent and utilities assistance to Duval County renter-household residents. This was an immediate response from the Federal government to assist vulnerable families that were severely affected by the COVID-19 pandemic. Since the initial tranche of these dollars there were very short timelines given for the distribution of these funds. Also, the US Treasury had not completely solidified the criteria for distribution. Initially, the criteria for distribution were very stringent, delaying the processing or making it too cumbersome for some applicants to eligibility criteria. The Treasury held several forums to share best practices and to hear some of the challenges that municipalities were having with getting the funds out to the community.

Our initial attempt at distributing the funds led us to form a partnership with United Way of Northeast Florida (UW) as the lead agency for deploying the funds since they partner with multiple agencies through their 2-1-1 Program, who provide financial support to low-income families daily. These agencies included several local agencies, to include, The LJD Jewish Family and Community Services, Downtown Ecumenical Services Council, Beaches Emergency Assistance Ministry (BEAM), Wealth Watchers Inc. and Catholic Charities Bureau Inc and an out-of-town agency, Civitas.

Pursuant to ordinance code 2021-0156, the COJ appropriated nearly 29 million dollars for emergency rent and utility assistance to UW, allowing a direct contract with Civitas for the same. Each agency received administrative dollars, not to exceed 7.5% (\$1.7MM) of the maximum contract amount from the funding and allowed for the purchase of a software program, license, and support services from Neighborly Software. This software had been used for several years through other municipalities and had proved to be a more efficient process for funding allocations. The remaining funds were then distributed to any qualifying low-income renter-household applicants.

The Treasury would send frequent timeliness reports, pointing out whether we were on track for meeting our expenditure deadline. What we found, initially, was that the agencies that were a part of the 2-1-1 program were taking 2-3 weeks, in most cases, and over a month for others to issue payments to applicants that had already been approved. The benefit to having the Neighborly Software is that it gives the applicants real-time updates on the status of their case. With that, many applicants noticed that they had been approved but had not received their assistance. Many of the agencies, according to

applicants, were not taking phone calls and were slow to respond to emails to update the status. Since we were the issuer of the funds, those calls were then redirected to the City of Jacksonville. We were receiving upwards of thirty to forty calls on a regular basis from applicants who were complaining about the lack of reciprocity as it relates to communication and obviously in a panic about potentially being displaced due to their inability to satisfy their rent. Please keep in mind that this was prior to the state/local moratorium to pause evictions.

During the event, we held frequent status meetings with UW and explained the concerns that we had with some of their partnering agencies. Unfortunately, UW was unable to change the behavior of the agencies that were making it nearly impossible for many applicants to qualify. It was determined later that many of the agencies had stricter procedures for qualifying applicants and they were uncomfortable with conforming to the standard requirements from the Treasury that were already strict enough. However, it was noticed that Civitas, although a much smaller organization, was able to distribute funds faster and more efficiently than the other partnering agencies. Also, there were issues with basic reporting from some of the 2-1-1 partners that would have triggered poor audit results. Thankfully, UW stepped in to assist us with that although it took several months to correct.

Due to our successful deployment of the funds, in September 2021, the Treasury allocated another tranche of ERA funding, slightly upward of 30 million dollars. Due to Civitas' ability to quickly distribute the funding, we decided to go in a different direction and allow Civitas to be our sole source of ERA funds. Civitas has a team of 8 individuals, all of whom previously worked for either the Housing and Urban Development Department (HUD) or for the US Treasury, based on conversation that we had with the staff during the initial appropriation cycle. Civitas was very responsive from the onset; we received minimal calls from applicants complaining about the status of their case. Furthermore, they provided extensive technical, compliance and operational support to the COJ HCDD staff. Civitas made Jacksonville a model municipality for the distribution of ERA funds.

As a result, we received another \$6.2 million in June through November 2022 and \$6.3 million in March 2023. Since the number of applications that we were receiving began to decrease, we shared 2 million dollars with our Social Services Division which is an extension of our Parks, Recreation, and Community Development Services Department because they offer financial support to the most vulnerable citizens in our city as they often receive requests from a different type of customer that would normally reach out to the HCDD. Many of their clients do not have internet access, transportation, or a support system to assist them. Social Services was successful in their distribution of the funds. We are proud to note that we served nearly 2,000 families combined with the funding that we received.

The Social Services Division also noted that they were not receiving as many applications as in the past, because many restrictions that existed from the pandemic had been lifted and people were going back to work. In the meantime, the Treasury updated the permissible use of the funds, allowing for affordable rental development. We kept approximately 6 million dollars earmarked for that purpose. We are currently in the process of making recommendations to be able to utilize the dollars.

As it relates to the recommendations suggested by the Office of Inspector General (OIG), we agree, however, may be limited in some instances.

1. Update City Contracts to include the retention of PDF files including those derived from subcontractors.

We agree with this recommendation and will include in any future contract language.

2. Allocate necessary funds for adequate record retention.

We will allocate necessary funding for the purposes of required records retention.

3. Directly contract with City Contractors for the purchase of software, license, and support services.

We plan to strongly encourage contractors to invest in the purchase of software, licenses, and support services to assist with project management.

4. Require City Contractors to complete and provide proof of fraud detection training.

We are committed to providing recommended resources and verification of fraud detection training for our city contractors.

5. Require City Contractors to establish a fraud detection system.

Moving forward, we will add that we strongly recommend that the Contractors establish a fraud detection system and will work with Procurement to add this language in the process. We would also consider making this an incentive for the contractor by giving an extra point in the scoring process.

6. Ensure City Contractors promptly report suspected and identified fraud cases to the City, OIG, and law enforcement agencies.

We are committed to adding additional language to the contract that explicitly states that if there is any fraud detected that the Contractor must first notify the COJ and subsequently report the incident to the OIG, the Jacksonville Sheriff's Office, and any other applicable law enforcement agencies. However, we would like to show (see attached) that suspected fraudulent applications were being referred to our local Sheriff's Office.

In closing, we commit to ensuring that our contracts contain all the language required to meet HUD standards, adding additional language to contracts to protect against fraudulent activity and creating a mechanism for reporting any suspected fraud attempts to the COJ, the Jacksonville Sheriff's Office, and any other applicable law enforcement agencies. We believe that we have addressed all the recommended corrective actions listed within your report.

Regards,

Chiquita Moore

Cc: Kelli O'Leary, Deputy Chief Administrative Officer

From: [Jeffrey, Travis](#)
To: [Moore, Chiquita](#)
Subject: Fw: ERAP fraud case investigation
Date: Friday, January 12, 2024 2:08:16 PM
Attachments: [image001.png](#)
[image002.png](#)
[\[REDACTED\] W-9 and Ledger.pdf](#)
[\[REDACTED\] lease \(1\).pdf](#)
[TenantRental&UtilityAssistance Application \[REDACTED\] \(1\).pdf](#)
[Outlook-ai5goc5.png](#)

FYI

Travis Jeffrey

Chief, Housing & Community Development Division

City of Jacksonville

214 N. Hogan Street, 7th Floor

Jacksonville, Florida 32202

T: (904) 255-8227 / F: (904) 255-8209



From: Erich Chatham <erich.chatham@civitassc.com>
Sent: Thursday, January 11, 2024 5:59 PM
To: Jeffrey, Travis <TJeffrey@coj.net>
Subject: Fwd: ERAP fraud case investigation

EXTERNAL EMAIL: This email originated from a non-COJ email address. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Erich Chatham
Civitas LLC
www.civitassc.com
(843) 573-7825 office
(404) 408-1256 cell

Begin forwarded message:

From: Kari Dettmer <kari.dettmer@civitassc.com>
Date: January 11, 2024 at 5:51:13 PM EST
To: Erich Chatham <erich.chatham@civitassc.com>
Subject: Fwd: Check

This is the direct communication with the [REDACTED] on the case they asked about - the original request was sent to Curt.

Sincerely,
Kari Dettmer
Civitas LLC



----- Forwarded message -----

From: Kari Dettmer <kari.dettmer@civitassc.com>
Date: Tue, Sep 20, 2022 at 3:54 PM
Subject: Re: Check
To: [REDACTED]
Cc: Erich Chatham <erich.chatham@civitassc.com>

Good afternoon,

The application came from [REDACTED], I have attached a copy of the application to this email. I have also attached the lease, ledger, and W-9 we received. Finally, I have attached an email from [REDACTED] confirming [REDACTED] received the check. Please let me know if I can be of further assistance. Thank you!

[REDACTED]

Sincerely,
Kari Dettmer
Civitas LLC



On Tue, Sep 20, 2022 at 2:30 PM [REDACTED]

[REDACTED] wrote:

Can you please forward me any application [REDACTED] may have filled out or any communication you have from [REDACTED]?

Thank you,

[REDACTED]

[REDACTED]

From: Kari Dettmer <kari.dettmer@civitassc.com>
Sent: Tuesday, September 20, 2022 8:48 AM
To: [REDACTED]
Cc: Karen Chatham <karen.chatham@civitassc.com>; Curtis Chatham <curtis.chatham@civitassc.com>; Erich Chatham <erich.chatham@civitassc.com>
Subject: Re: Check

*****EXTERNAL EMAIL SOURCE*****

This email was sent from a non-[REDACTED] account. Do not open any links or any attachments unless you trust the sender and know the content is safe.

Good morning,

You're welcome. If there is known fraud we do report it to your office. In most cases though, we may suspect fraud and cannot prove it. In those instances we would then reject/deny the application after exhausting all of our available resources to alleviate the suspicion. Again, please let me know if I can be of further assistance. Thank you!

Sincerely,
Kari Dettmer
Civitas LLC



On Tue, Sep 20, 2022 at 8:40 AM [REDACTED] wrote:

Thank you for that information. When you do discover fraud, is there a "usual" law enforcement agency you contact to investigate? We are most likely going to open and investigation on both of them.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Kari Dettmer <kari.dettmer@civitassc.com>
Sent: Tuesday, September 20, 2022 8:37 AM
To: [REDACTED]
Cc: Karen Chatham <karen.chatham@civitassc.com>; Curtis Chatham <curtis.chatham@civitassc.com>; Erich Chatham <erich.chatham@civitassc.com>
Subject: Re: Check

*****EXTERNAL EMAIL SOURCE*****

This email was sent from a non-[REDACTED] account. Do not open any links or any attachments unless you trust the sender and know the content is safe.

Good morning,

This check is one that we did issue to [REDACTED] as the landlord to [REDACTED]. [REDACTED] application and submitted documents indicated [REDACTED] was a tenant at [REDACTED]. The check cleared our bank on 9/13/2021. During the course of this program, we have continued to implement new strategies to detect and prevent fraud cases being approved. This case is one that was approved prior to our current measures being implemented. Please let me know if there is any additional information that you need from us. Thank you!

Sincerely,
Kari Dettmer, COJ ERA Program Director
Civitas LLC



On Mon, Sep 19, 2022 at 7:51 PM Curtis Chatham <curtis.chatham@civitassc.com> wrote:

Hi [REDACTED]

Sorry for the delayed response. I have cc'ed the company controller to help with this inquiry.

Curt Chatham
COJ ERAP Consultant - [ERAP FAQ](#)
Civitas LLC

www.civitassc.com

On Tue, Aug 30, 2022 at 6:26 AM [REDACTED]

[REDACTED] wrote:

Hello Sir,

We received a tip for a potential ERAP fraud. Can you verify if the check below is legitimate or not? If so, is there any application information?

Thank you,



[REDACTED]

[REDACTED]

