

City of Detroit
Office of Inspector General
OIG Case No. 23-0014-INV
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CITY OF DETROIT
OFFICE OF INSPECTOR GENERAL
INVESTIGATIVE REPORT

DATE:

3/7/2024

I. Summary

On April 12, 2023, the City of Detroit Office of Inspector General (OIG) received a Memorandum on behalf of Council Member Mary Waters requesting this office conduct an audit of the Detroit Land Bank Authority (DLBA).¹ The memorandum stated some occupants of DLBA-owned properties were not given the opportunity to participate in the Buy Back Program and Occupied Property Disposition Program (OPDP). It alleged that DLBA is offering occupied properties to DLBA’s community partner organizations and/or developers for purchase.² It was further alleged the DLBA is bypassing on collaborating with the residents who occupy the properties and/or denying eligible Detroiters the opportunity to participate in the program.³ Based on the evidence examined during this investigation, the OIG finds no evidence of fraud, abuse, and/or corruption in the DLBA’s Buy Back Program or OPDP.

II. Background

a. Legislative Policy Division Memorandum

Council Member Mary Waters initially requested the Legislative Policy Division to draft a memorandum requesting that the OIG conduct an audit⁴ of the DLBA. The request pertained to “occupants of DLBA homes [who] were defrauded by individuals who had no true ownership of the property resulting in the landowner criminally taking the occupants money⁵” The memorandum alleged “that occupants of the DLBA properties are not being given the opportunity to participate in the Buy Back/Occupied program and instead the occupied property is being offered to the DLBA’s community partner organizations.⁶” In order to determine whether fraud, abuse, or corruption was involved in denying occupants to participate in the Buy Back Program and the OPDP, the OIG initiated an investigation. As such, we began the investigation by reviewing DLBA’s data that included all addresses and occupant information

¹ Memorandum requesting the OIG to conduct an audit of the Detroit Land Bank Authority, Detroit City Council. (April 4, 2023).

² *Id.*

³ *Id.*

⁴ Based on the nature of the request, the OIG determined that an investigation would be more appropriate in this instance.

⁵ Memorandum requesting the OIG to conduct an audit of the Detroit Land Bank Authority, Detroit City Council. (April 4, 2023).

⁶ *Id.*

pertaining to DLBA owned properties. More specifically, we focused our investigation on the properties where an occupant(s) showed an interest in participating in the Buy Back Program.

b. Detroit Land Bank Authority (DLBA)

The DLBA was created to make City/DLBA owned vacant and residential property available for sale to promote homeownership.⁷ The DLBA was created to acquire and dispose of these properties to stabilize neighborhoods and return the properties to private and productive use.⁸ The DLBA's property inventory includes properties with existing occupants who do not have a legal right to the property.⁹

i. Occupied Property Disposition Program (OPDP)

On November 1, 2014, the DLBA Board approved the *Disposition of Occupied Properties to Nonprofit Entities Policy*, which established the OPDP.¹⁰ The OPDP is designed to transfer occupied residential properties to pre-approved, non-profit agencies and community development organizations that can provide rental and purchase options to existing occupants.¹¹ The non-profit agencies must be committed to renovating the houses and working with the occupants to assist them with becoming successful homeowners and/or renters.¹²

ii. Buy Back Program

After OPDP was implemented, on July 20, 2015, the DLBA Board of Directors approved the Buy Back Program.¹³ Unlike the OPDP, the Buy Back Program was designed to provide an opportunity for eligible occupants of properties owned by the DLBA to purchase the property and become responsible homeowners, so that the occupants of the DLBA properties may remain in their homes.¹⁴ For the Buy Back Program, the DLBA included those properties with existing occupants who do not have a legal right to the property.¹⁵ The Buy Back Program is different from the OPDP in that the Buy Back Program offers qualified occupants a path to legal occupancy and ownership of those properties.¹⁶

⁷⁷ "Policies & Procedures," Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>.

⁸ "Policies & Procedures," Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>.

⁹ OIG Interview of DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna November 2, 2023.

¹⁰ Resolution Authorizing Disposition of Occupied Properties to Nonprofit Entities Policy, Detroit Land Bank Authority. (November 1, 2014).

¹¹ *Id.*

¹² "Policies & Procedures," Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>.

¹³ Resolution Adopting Policy on the Disposition of Properties to Certain Existing Occupants Through the Buy Back Program.

¹⁴ "Policies & Procedures," Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>.

¹⁵ OIG Interview of DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna November 2, 2023.

¹⁶ "Policies & Procedures," Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>.

iii. Precariously Housed Initiative Pilot Process

In May 2022, the DLBA created the Precariously House Initiative Pilot Process to identify, and vet occupied properties for outreach. The pilot process was implemented to connect the occupants to the DLBA occupied programming by vetting properties that are both occupied and vacant.¹⁷ This pilot process was for DLBA properties. To conduct the vetting process, DLBA partnered with the Detroit Health Department (DHD)/Community Health Corps (CHC), Matrix Human Services, and United Way for Southeast Michigan.¹⁸

The process began with the DLBA mailing a postcard addressed to DLBA properties. The DHD/CHC then performs an exterior survey of these properties. If the property is occupied by a person at the time of the survey, the property is labeled as Self-Identified Occupant (SIO). The DLBA then connects the SIOs with Matrix Human Services for any supportive services and financial coaching.¹⁹ If there is no SIO, the DLBA Outreach Team will attempt to contact the occupant for up to five (5) visits.²⁰ After five (5) visits, if no successful contact has been made, the property is returned to the DLBA inventory.²¹

c. Eligibility Requirements for Buy Back Program

It is important to note that not all SIOs are eligible to apply or to participate in the Buy Back Program. The SIOs of the DLBA properties must meet DLBA's eligibility requirements to participate in the Buy Back Program.²² Section 2 of the Occupied Property Buy Back Program Policy describes the eligibility requirements for occupants to participate in the Buy Back Program.²³ In particular, Section 2 states:

- I. ***Occupant Eligibility***. Identified potential Occupants must demonstrate their eligibility to participate in Buy Back. The following criteria must be met before a Property may be transferred to an Occupant.
 - A. The Property is used as the Occupant's primary residence, the Occupant does not own any residentially zoned property, and has not previously purchased a property through the DLBA.

¹⁷ Detroit Land Bank Authority (DLBA), Precariously Housed Initiative Pilot Process, May, 2022.

¹⁸ Detroit Land Bank Authority (DLBA), Precariously Housed Initiative Pilot Process, May, 2022.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Draft of Detroit Land Bank Authority, Occupied Property Buy Back Program Policy dated December 1, 2021, attached to Memorandum to Council President Pro-Tempore James E. Tate, Council Members Latisha Johnson and Fred Durhal, thru Planning and Economic Development Standing Committee, CC Council President Mary Sheffield, Council Members Scott Benson, Angela Whitfield-Calloway, Gabriela Santiago-Romero, Colman A. Young, II, Mary Waters, and the Legislative Policy Division, from Tammy Daniels, CEO, Detroit Land Bank Authority, RE: Detroit Land Bank Authority Submission Related to Outreach Efforts on 25 properties Included in its Occupied Property Disposition Program, April 3, 2023.*

B. The Occupant provides documentation of at least one of the following.

(1) The Occupant is a **former owner** of the Property, documented by:

(a) A copy of a recorded deed, mortgage, or mortgage discharge; and
(b) (i) proof of utility payments in the Occupant's name, as applicable, showing usage at the Property commensurate with occupation at the Property, or

(ii) valid government issued ID in the name of the Occupant matching the address of the Property.

(2) The Occupant is a **recent tenant** of the Property, documented by:

(a) valid rental or lease agreement executed with a former owner of the Property; and

(b) proof of payment of rental to a former owner of the Property (e.g. text messages, receipts, emails, cancelled checks, bank statements); and

(c) (i) proof of utility payments in the Occupant's name, as applicable, showing usage at the Property commensurate with occupation at the Property, or

(ii) valid government issued ID in the name of the Occupant matching the address of the Property.

(3) The Occupant is an **immediate family member of a former owner or tenant** of the Property, documented by:

(a) (i) proof of family member's ownership or rental agreement (same documentation required as in Section B(1) or B(2), as applicable), and

(ii) proof of relationship (e.g. marriage certificate, birth certificate, or death certificate); and

(b) Proof of utility payments in the Occupant's name, as applicable, showing usage at the Property commensurate with occupation at the Property or valid government issued ID in the name of the Occupant matching the address of the Property.

(4) The Occupant has been receiving one or more legally authorized utilities at the Property, documented by:

(a) Proof of utility usage and payments in the Occupant's name, as applicable, commensurate with occupation at the Property for at least 12 consecutive months during a period reasonably prior to contact with the DLBA regarding the Property; and

(b) Valid government issued ID in the name of the Occupant matching the address of the Property.

(4) The Occupant has been receiving one or more **legally authorized utilities** at the Property, documented by: (a) Proof of utility usage and payments in the Occupant's name, as applicable, commensurate with occupation at the Property for at least 12 consecutive months during a period reasonably prior to contact with the DLBA regarding the Property; and

(b) Valid government issued ID in the name of the Occupant matching the address of the Property.

(5) The Occupant has **made significant improvements** to the structure, documented by verifiable receipts, building permits, or before-and-after photographs documenting significant structural improvement to the home (e.g. roof, porch, or foundation) that were done prior to contact with the DLBA.

(6) The Occupant was a **victim of fraud** in connection with the Property and has filed a report with the authorities regarding the fraud, documented by verified proof that purchase, lease, or land contract payments were being made to an alleged owner or management company (e.g. text messages, receipts, emails, cancelled checks, bank statements).

(7) The Occupant has received **federal or state documents connecting services or benefits or income-related documents** at the Property, documented by:

(a) Current benefits or mailed income letter (e.g. 1095(b), W2, 1099, DHS or SSA) to the Property relating to a period of at least 18 consecutive months reasonably prior to contact with the DLBA regarding the Property; and

(b) Valid government issued ID in the name of the Occupant matching the address of the Property.

C. Notwithstanding anything to the contrary in this Policy, the DLBA staff may, in their sole discretion, deem any Occupant ineligible for Buy Back or interpret the requirements of this section to best fit particular circumstances. An Occupant may appeal an ineligible determination to the DLBA's Executive Director and General Counsel.

D. If an Occupant is found to be involved with criminal activity at the Property or is deemed by the DLBA to be threatening the safety or security of their neighbors, the peaceful enjoyment by neighbors of their property, or the stability of the neighborhood, then they are ineligible for Buy Back regardless of any other qualifications.

According to the DLBA's Failed Buy Back definition, DLBA lists "failed" Buy Back as:

- Unauthorized Occupant (Not OPDP eligible)

- No documentation provided.
- Non-Compliant, the SIO responded to requests to come forward, but failed to meet the deadline or further program requirements.
- Unresponsive, no occupant responded to requests to come forward, or the SIO failed to make further contact with the DLBA.²⁴

If the SIO is deemed ineligible for the Buy Back Program, the property is then removed from the Buy Back pipeline and returned to the DLBA Inventory-Occupied status and the property is further reviewed for the OPDP. Otherwise, the property is either deemed vacant and moves into a sales pipeline or is slated towards demolition.²⁵ The DLBA may also deem an occupant ineligible for the BBP at its sole discretion.²⁶

III. Analysis and Findings

The following outlines what the OIG reviewed and investigated to make its findings.

a. Twenty-Six Occupied Properties Involved in the Bedford Deal

Because the initial complaints originated from Council Member (CM) Waters' Office, on July 17, 2023, the OIG contacted CM Waters' Chief of Staff Santana Hill to obtain contact information for the residents who were allegedly affected by the proposed sale of properties owned by the DLBA through the Buy Back Program and OPDP.²⁷ On August 3, 2023 the OIG received a list of 26 addresses from Ms. Hill entitled "Exhibit A"²⁸. Upon further review, the OIG found that the 26 addresses were associated with the Bedford Deal. Bedford Development LLC entered into an option agreement with the City of Detroit to purchase 42 DLBA-owned properties for the purchase price of \$150,000 ("Bedford Deal").²⁹

The twenty-six properties were selected for the sale package because they were occupied, but failed to qualify for the Buy Back Program.³⁰ On September 19, 2023, the OIG met with Ms. Hill who, upon further review, confirmed that the 26 properties identified in "Exhibit A" was in fact 26 properties involved in the Bedford Deal.³¹ According to the DLBA, these 26 properties

²⁴ *Id.*

²⁵ DLBA Failed Buy Back Definitions 2022.

²⁶ *Id.*

²⁷ Email from OIG Investigator April Page to Council Member Waters' Chief of Staff Santana Hill, RE: DLBA, dated July 17, 2023.

²⁸ Email to OIG Investigator April Page from Council Member Waters' Chief of Staff Santana Hill, RE: DLBA, dated August 3, 2023.

²⁹ Undated Letter from Detroit Land Bank Authority Attorney Matthew Langston to The Planning and Development Department. RE: Submitting resolution authorizing a sale by the DLBA to Bedford Development, LLC.

³⁰ Memorandum to Council President Pro-Tempore James E. Tate, Council Members Latisha Johnson and Fred Durhal, thru Planning and Economic Development Standing Committee, CC Council President Mary Sheffield, Council Members Scott Benson, Angela Whitfield-Calloway, Gabriela Santiago-Romero, Colmane A. Young, II, Mary Waters, and the Legislative Policy Division, from Tammy Daniels, CEO, Detroit Land Bank Authority, RE: Detroit Land Bank Authority Submission Related to Outreach Efforts on 25 properties Included in its Occupied Property Disposition Program, April 3, 2023.

³¹ OIG Interview of Council Member Waters Chief of Staff Santana Hill, September 19, 2023

are currently being held in the OPDP pipeline, pending the outcome of the Bedford Deal. There have been no sales transactions related to these occupied properties.³² In addition, the OIG found no evidence that the DLBA sold these properties to Bedford Development instead of offering the properties to a qualified SIO or a SIO who met the Buy Back Program requirements.

b. Fifty-Seven Properties Identified in Occupied Intake Batch Forms

Council Member Waters' Office also provided 57 addresses contained in *Occupied Intake Batch Forms*. Ms. Hill explained that the 57 *Occupied Intake Batch Forms* were filled out at three (3) DLBA fairs that "were attended by residents that were targeted by Council Member Waters via mail."³³ The residents were invited to attend the fair if they were interested in meeting with DLBA representatives to discuss ownership of the properties that they were occupying.³⁴

The OIG reviewed all the addresses listed on the *Occupied Intake Batch Forms* with information from the DLBA's Salesforce. Salesforce is an electronic platform that stores information about properties within the City of Detroit. Based on our review of the Salesforce information, we found none of the 57 addresses identified in the *Occupied Intake Batch Forms* were sold through the Buy Back Program or the OPDP. The OIG found no evidence that the 57 properties identified in the *Occupied Intake Batch Forms* were sold to developers instead of the occupants that attended the DLBA fairs.³⁵

c. Interview of a Potential Victim of Fraud in the Buy Back Program

In addition to the above-referenced 26 and the 57 properties, Ms. Rushan Long was specifically identified as a potential victim of fraud. Therefore, on August 4, 2023, the OIG interviewed Ms. Long. According to Ms. Long, on May 17, 2022, the DLBA left a note on the property she was occupying.³⁶ The note stated that she must enter into a consent agreement with the DLBA to fix up the property.³⁷ Salesforce notes confirm that there was a poster left on the property and stated that the DLBA followed the City of Detroit's Nuisance Abatement Process.³⁸ The OIG confirmed postering and requiring a consent agreement for dilapidated properties are standard practice in the City's Nuisance Abatement Process.³⁹ Ms. Long also confirmed that the property she was occupying was under construction and the upper-level windows were boarded due to a fire.⁴⁰ Nevertheless, Ms. Long informed the OIG that the issue she had with the City has

³² OIG Interview of DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna February 13, 2024.

³³ OIG Interview of Council Member Waters Chief of Staff Santana Hill, September 19, 2023.

³⁴ *Id.*

³⁵ Note: During the investigation the OIG received information that 4 of the occupants listed on the *Occupied Intake Batch Forms* are eligible for the Buy Back Program. Email from DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna, RE: Staff Directory, dated February 19, 2024.

³⁶ OIG Interview of Rushan Long, August 4, 2023.

³⁷ *Id.*

³⁸ "Detroit Land Bank", Salesforce, accessed August 9, 2023, <https://detroitlandbank.my.salesforce.com/001j000000IeZfk>

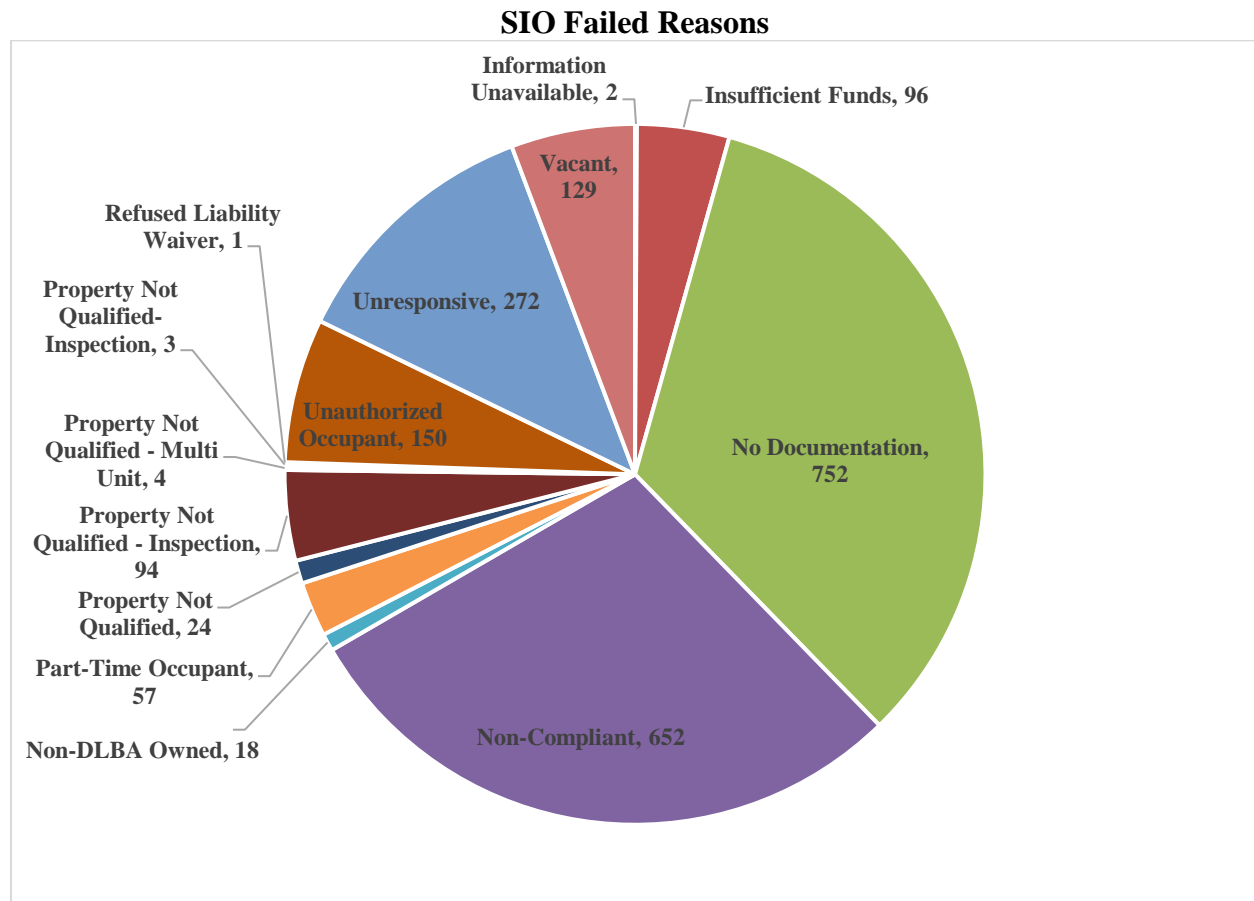
³⁹ See DLBA Nuisance Abatement Process available online at <https://buildingdetroit.org/nuisance-abatement>

⁴⁰ *Id.*

since been resolved and she is satisfied with the outcome.⁴¹ Therefore, the OIG finds no DLBA employee engaged in fraud, abuse or corruption when the property was postered and a consent agreement was requested from Ms. Long.

d. OIG’s Review of SIOs and Buy Back Program Properties

The OIG also compared property data that was provided by the DLBA with property data that was available in Salesforce, to determine if there was any SIO who failed to qualify for the Buy Back Program and if the property the SIO occupied was sold to a non-profit partner through the OPDP. The OIG found that there were 1,949 properties where 2,254 SIO’s attempted to qualify for ownership. The information contained in Salesforce confirms that the DLBA first offered the SIOs the opportunity to purchase the DLBA properties through the Buy Back Program.⁴² However, when the SIOs “failed” to be eligible for the Buy Back Program, the properties were then placed in the OPDP pipeline for eligible partners to purchase and rehab the homes, as required by the DLBA’s policy.⁴³ Below is a chart which reflect the different category of reasons why the SIOs failed the Buy Back Program and the corresponding number.



⁴¹ OIG Interview of Rushan Long, August 4, 2023.

⁴² Detroit Land Bank”, Salesforce, accessed August 9, 2023, <https://detroitlandbank.my.salesforce.com/001j000000IeZfk>

⁴³ OIG Interview of DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna November 2, 2023.

The DLBA defines the categories above as:

- **Property not qualified-Inspection** - DLBA cannot sell the property through Buy Back Program because it failed inspection, as the property was deemed in habitable.
- **Property not qualified -Multi Unit** - Prior to 2020, multi-unit houses were not eligible for the Buy Back Program. There was a policy amendment and after 2020, some multi-unit houses became eligible for occupied programming except for properties that have disconnected parties occupying the structure.
- **Property not qualified** - As Salesforce evolved, this definition became more specific to the actual failed reason but is the same as Property failed inspection and multi-unit because it addresses a property being ineligible as opposed to a person.
- **Unresponsive** - Several attempts at outreach were conducted by the DLBA via phone, postcard, letters, and site visits to make contact with the occupant but the occupant would not respond to any of the DLBA's attempts.
- **Refused liability waiver**- Refused to sign a waiver releasing the DLBA of all liabilities that may arise from occupying a DLBA owned property.
- **Non-compliant**- The occupant responded to the DLBA's request to come forward, but the occupant failed to meet deadlines for DLBA request.⁴⁴

e. OIG's Review of Properties Sold Through the DLBA's OPDP

According to the DLBA, one hundred and twenty-nine (129) DLBA-owned properties were sold through the OPDP pipeline between May 2016 and April 2023. Forty-eight (48) of the 129 properties were sold to KB Stallworth of Black Caucus Foundation of Michigan, doing business under the Bridges to Home Ownership (BTHO). DLBA explained through its counsel that in 2015, KB Stallworth approached the City of Detroit requesting a bundle of houses to rehab within 12-months.⁴⁵ The DLBA's Memorandum of Understanding (MOU) between the City of Detroit and DLBA states that the DLBA shall seek the approval of the Mayor and City Council prior to the subsequent transfer of ten (10) or more parcels to the same transferee within

⁴⁴ Email from DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna, RE: Definitions, dated February 8, 2024.

⁴⁵ OIG Interview of DLBA Chief Counsel, J. Gabriel Guerrero November 15, 2023.

a rolling 12 month period.⁴⁶ The OIG confirmed the transfer of these 48 properties to the BTHO were approved by City Council on March 17, 2016.⁴⁷

However, we note that of the 48 properties sold to BTHO, seventeen (17) properties lacked information related to the sales in Salesforce. In addition, 12 of the 48 properties were sold to BTHO before the listed Buy Back fail date. The remaining 100 properties were sold to BTHO and other OPDP partners. Based on the information we reviewed, the 100 properties were sold after the Buy Back fail date, in compliance with DLBA’s policy.⁴⁸

The 12 of the 48 DLBA Properties that were sold to BTHO before the recorded “failed” date are listed in the following table:

Address	Failed Date	Sold Date
19133 Marlowe	12/6/17	5/25/16
19637 Shiawasee	12/6/17	5/25/16
16623 Ilene	12/6/17	5/25/16
7227 Stout	12/11/17	10/31/17
18045 St. Marys	12/11/17	11/29/17
14254 St. Marys	12/11/17	3/17/17
14545 Artesian	12/11/17	3/16/17
18970 Strathmore	12/11/17	3/17/17
6014 Bishop	12/11/17	8/3/17
19217 Murray Hill	12/11/17	3/16/17
8240 Artesian	12/11/17	8/3/17
13869 Fairmount	2/13/18	11/29/17

However, the fact that these 12 properties were sold before the Buy Back failed date alone does not by themselves evidence fraud, abuse, or corruption. Nevertheless, the OIG is identifying these properties because they may be one of the properties that some residents were complaining about, as described in LPD’s memorandum to the OIG.

In addition, the OIG found 17 DLBA properties sold to the BTHO, where there is no information in the Salesforce, such as a failed date or the reason for the failure. According to the DLBA, the employees who were involved in the BTHO agreement and responsible for entering relevant information into Salesforce, including uploading required documentation, are no longer with the DLBA. As such, the DLBA was not able to provide an explanation to the missing information and the OIG was unable to independently verify if there were eligible SIO’s for these 17 properties.

⁴⁶ Second Amended and Restated Memorandum of Understanding Between the City Detroit and the Detroit Land Bank Authority, May 19, 2020.

⁴⁷ Occupied Property Non-Profit Program agreement between the DLBA and Bridge to Homeownership, Inc., March 17, 2016.

⁴⁸ “Policies & Procedures,” Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>

Instead, the DLBA provided the OIG with the following information. According to the DLBA Director of Real Estate, Sales and Marketing, the occupants of some BTHO properties notified the DLBA that BTHO was leaving notices/stickers on properties and knocking on doors prior to closing on some of the properties. Occupants also complained to the DLBA that they were being “pushed out” before having an opportunity to stay in the property.⁴⁹ According to the DLBA, the BTHO did not have the authority to contact the occupants directly prior to purchasing the properties. Therefore, the DLBA stopped providing lists of available properties to the BTHO, as the BTHO was not in compliance with their agreement with the DLBA.

We note none of these properties were included in the lists identified by CM Waters’ Office. Additionally, to address these complaints, the DLBA created a new OPDP policy to ensure that non-profit partners are in full compliance with the policy when purchasing properties⁵⁰. For purposes of transparency, we are attaching a list of the 129 properties that were sold to non-profit partners through the OPDP at the end of this report. However, it is important to note that none of these properties were on the DLBA’s Buy Back Program and the sale of these properties was previously approved by the Detroit City Council.

IV. Conclusion

The OIG finds no evidence to substantiate fraud, abuse or corruption in the DLBA’s Buy Back Program or the OPDP. Based on the evidence reviewed, the 26 properties listed on Exhibit A, that are included in the pending Bedford Deal, have not yet been sold to OPDP nonprofit partners and the occupants have already been deemed ineligible for the Buy Back Program.⁵¹

We found no evidence that the DLBA offered properties to non-profit partners instead of occupants who were eligible to obtain the properties through the DLBA’s Buy Back Program or OPDP. We did find however that the DLBA could not provide a detailed explanation of the sale of 29 of the 129 properties sold through OPDP. However, the OIG could not substantiate whether any former DLBA employees engaged in abuse, fraud, or corruption in connection with the 29 properties sold to BTHO. However, the sale of those properties was approved by Detroit City Council. More importantly, we note that the DLBA has already taken steps to prevent similar issues in the future by updating the Occupied Property Buy Back Program Policy.⁵²

Lastly, as to the allegation that occupants were defrauded by individuals who have no legal authority to the property, the OIG does not have jurisdiction over fraud committed by any non-City officials, employees, or contractors. When the City is not involved, the allegation of fraud being committed by an individual against another individual is simply a legal dispute between two individuals.

⁴⁹ OIG Interview of DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna November 2, 2023.

⁵⁰ *Id.*

⁵¹ Note: During the investigation the OIG received information that three of the previously disqualified properties and/or occupants are now in the Buy Back Program. Email from DLBA Director of Real Estate, Sales, and Marketing, Jano Hanna, RE: Staff Directory, dated February 19, 2024.

⁵² Policies & Procedures,” Detroit Land Bank Authority, accessed September 11, 2023, <https://buildingdetroit.org/our-policies>

Evidence Reviewed

a. Interviews

- On May 31, 2023, Jano Hanna was interviewed via Google Meet.
- On May 31, 2023, J. Gabriel Guerrero was interviewed via Google Meet.
- On August 3, 2023, Santana Hill was interviewed via Google Meet.
- On August 4, 2023, Rushan Long was interviewed via telephone.
- On September 27, 2023, Jano Hanna was interviewed via Google Meet.
- On September 27, 2023, J. Gabriel Guerrero was interviewed via Google Meet.
- On November 2, 2023, Jano Hanna was interviewed via Google Meet.
- On November 2, 2023, J. Gabriel Guerrero was interviewed via Google Meet.
- On November 15, 2023, Jano Hanna was interviewed via Google Meet.
- On November 15, 2023, J. Gabriel Guerrero was interviewed via Google Meet.

b. Documents

1. Reviewed were 2,370 DLBA properties located in Salesforce.
2. Undated Buy Back Compliance Achieved for February 26, 2016- April 23, 2023, Spreadsheet
3. Title and Quiet Title Process undated.
4. Undated OPDP Program Partner Flow Chart
5. Undated OPDP Program Overview
6. Undated OPDP Overview
7. Relocation Process dated January, 2023
8. Failed Buy Back Definitions dated 2022
9. Buy Back Inventory Process dated March 6, 2023
10. Undated Buy Back Inspection Fail Out Standards
11. Precariously Housed Initiative Pilot Process dated May 2022
12. Undated Occupied Buy Back Program Road Map
13. Undated Buy Back Failed Inspections.
14. Second Amended DLBA MOU Dated May 19, 2020
15. Updated OPDP Compliance Achieved Report dated November 3, 2023
16. Additional Properties Updated Spreadsheet dated December 11, 2023
17. Resolution Adopting Policy on the Disposition of Properties to Certain Existing Occupants Through the Buy Back Program dated July 3, 2015
18. Occupied notification request spreadsheet dated June 6, 2023
19. Undated Occupied SF Status Description
20. Undated OPDP Partner List
21. Undated Release of Liability Letter
22. Detroit Land Bank Authority- Projects Deal Summary Sheet
23. iHeart Realty- Final Option Purchase Agreement dated April 4, 2022
24. Undated Detroit Land Bank Authority Policies and Procedures
25. Undated Occupied Intake Batch Forms

Attachment

Occupied Property Disposition Program

Attachment

Property Address	BB Failed Date	BB Failed Reason	Failed Reason notes	Sold Date	OPDP Partner
14950 Lindsay		n/a	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
18444 Ilene		n/a	BTHO properties. See Jano Hanna's note	3/16/2017	Black Caucus Foundation of Michigan
17190 Ardmore		n/a	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
19150 Murray Hill		n/a	BTHO properties. See Jano Hanna's note	3/16/2017	Black Caucus Foundation of Michigan
16656 Robson		n/a	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
19133 Marlowe	12/6/2017	Unresponsive	BTHO properties. See Jano Hanna's note	5/25/2016	Black Caucus Foundation of Michigan
19637 Shiawassee	12/6/2017	NON-DLBA Owned	BTHO properties. See Jano Hanna's note	5/25/2016	Black Caucus Foundation of Michigan
18469 Ohio		n/a	BTHO properties. See Jano Hanna's note	5/25/2016	Black Caucus Foundation of Michigan
16623 Ilene	12/6/2017	Unresponsive	BTHO properties. See Jano Hanna's note	5/25/2016	Black Caucus Foundation of Michigan
14802 Southfield	12/14/2016	Unresponsive	BTHO properties. See Jano Hanna's note	6/5/2017	Black Caucus Foundation of Michigan
16867 Lawton		n/a	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
16183 Freeland		n/a	BTHO properties. See Jano Hanna's note	3/16/2017	Black Caucus Foundation of Michigan
7227 Stout	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	10/31/2017	Black Caucus Foundation of Michigan
18045 St Marys	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	11/29/2017	Black Caucus Foundation of Michigan
14254 St Marys	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
14545 Artesian	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	3/16/2017	Black Caucus Foundation of Michigan
7745 Fielding	8/17/2017	Unresponsive	BTHO properties. See Jano Hanna's note	3/2/2018	Black Caucus Foundation of Michigan
13869 Fairmount Dr	2/13/2018	Unresponsive	BTHO properties. See Jano Hanna's note	11/29/2017	Black Caucus Foundation of Michigan
6014 Bishop	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	8/3/2017	Black Caucus Foundation of Michigan
13870 Edmore Dr		n/a	BTHO properties. See Jano Hanna's note	2/1/2018	Black Caucus Foundation of Michigan
10118 Curtis		n/a	BTHO properties. See Jano Hanna's note	10/31/2017	Black Caucus Foundation of Michigan
19217 Murray Hill	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	3/16/2017	Black Caucus Foundation of Michigan
19941 Ardmore	1/17/2018	Unresponsive	BTHO properties. See Jano Hanna's note	1/23/2018	Black Caucus Foundation of Michigan
13514 Woodmont	12/15/2017	No Documentation	BTHO properties. See Jano Hanna's note	2/1/2018	Black Caucus Foundation of Michigan
8240 Artesian	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	8/3/2017	Black Caucus Foundation of Michigan
16550 Archdale		n/a	BTHO properties. See Jano Hanna's note	8/3/2017	Black Caucus Foundation of Michigan
16535 Prest	12/13/2017	Non-compliant	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
13916 Rossini Drive	8/17/2017	Unresponsive	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
18970 Strathmoor	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	3/17/2017	Black Caucus Foundation of Michigan
13950 Asbury Park	1/19/2018	No Documentation	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
16762 St Marys		n/a	BTHO properties. See Jano Hanna's note	3/2/2018	Black Caucus Foundation of Michigan

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12757 Mettetal	8/17/2017	Unresponsive	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
11351 Vaughan		n/a	BTHO properties. See Jano Hanna's note	4/16/2018	Black Caucus Foundation of Michigan
18230 Hubbell	3/9/2018	Non-compliant	BTHO properties. See Jano Hanna's note	1/17/2019	Black Caucus Foundation of Michigan
12736 Duchess		n/a	BTHO properties. See Jano Hanna's note	5/7/2019	Black Caucus Foundation of Michigan
20135 Indiana		n/a	BTHO properties. See Jano Hanna's note	8/4/2017	Black Caucus Foundation of Michigan
12044 Forrer	12/15/2017	No Documentation	BTHO properties. See Jano Hanna's note	5/7/2019	Black Caucus Foundation of Michigan
13620 Rutherford	12/13/2017	Unauthorized Occupant	BTHO properties. See Jano Hanna's note	3/2/2018	Black Caucus Foundation of Michigan
18716 Avon	9/19/2017	Unresponsive	BTHO properties. See Jano Hanna's note	1/23/2018	Black Caucus Foundation of Michigan
18675 Avon	12/6/2017	Unresponsive	BTHO properties. See Jano Hanna's note	1/23/2018	Black Caucus Foundation of Michigan
1670 Edison	5/2/2017	Non-compliant	BTHO properties. See Jano Hanna's note	4/16/2018	Black Caucus Foundation of Michigan
11744 Wade	12/6/2017	Unresponsive	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
2518 N La Salle Gardens	2/28/2018	Non-compliant	BTHO properties. See Jano Hanna's note	1/17/2019	Black Caucus Foundation of Michigan
5747 Lakepointe		N/A	BTHO properties. See Jano Hanna's note	10/2/2018	Black Caucus Foundation of Michigan
13416 Marlowe		N/A	BTHO properties. See Jano Hanna's note	5/7/2019	Black Caucus Foundation of Michigan
16512 Braile	8/3/2017	Unresponsive	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
5084 Chatsworth	8/17/2017	No Documentation	BTHO properties. See Jano Hanna's note	9/26/2018	Black Caucus Foundation of Michigan
11367 Cheyenne	12/11/2017	Unresponsive	BTHO properties. See Jano Hanna's note	1/17/2019	Black Caucus Foundation of Michigan
6056 Grandville	10/24/2018	No Documentation	Occupant failed to submit eligible documents. 3 outreach attempt via inventory postering and phone	1/23/2019	Building Families First Community Development Organization
15974 Ellsworth	10/17/2018	No Documentation	Occupant failed to submit eligible documents. 3 outreach attempts via postering postering and phone.	1/23/2019	Building Families First Community Development Organization
21532 Curtis	12/15/2017	Non-compliant	Occupant was failed out due to not completing HPC course. 3 HPC letters mailed.	3/27/2019	Building Families First Community Development Organization
9555 Montrose	12/12/2017	Part-time Occupant	Per policy Part-time occupants do not qualify for Buyback Program. Participant failed out for occupying property less than a year	7/9/2019	Building Families First Community Development Organization

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19100 W Davison	11/19/2018	Non-compliant	Outreach by phone and letter mailed to complete inspection. Occupant failed due to not completing Inspection	3/27/2019	Building Families First Community Development Organization
22419 Eaton	2/8/2019	Part-time Occupant	Per policy Part-time occupants do not qualify for Buyback Program. Participant failed out for occupying property less than a year	5/2/2019	Building Families First Community Development Organization
20461 Ohio	2/25/2019	Unresponsive	Several attempts of outreach was made via property postering and postcard. no SIO came forward	9/11/2019	Building Families First Community Development Organization
9000 Stahelin	12/6/2017	Unresponsive	Participant did not respond to call fire or 3 rounds of postcards mailed to property	9/30/2021	Building Families First Community Development Organization
7384 Fielding	8/21/2019	No Documentation	outreach attempts- 1 in person, 1 letter, 2 calls via to collect eligibility documentation. Failed due to No documents	11/6/2020	Building Families First Community Development Organization
22191 Kessler	10/11/2019	Unresponsive	2 outreach attempts via postcarding, no SIO came forth.	5/6/2021	Building Families First Community Development Organization
24444 Puritan	4/30/2020	No Documentation	4 outreach attempts via inventory postering, phone calls and letters requesting documentation.	5/6/2021	Building Families First Community Development Organization
15095 Chatham	12/11/2017	Unresponsive	3 outreach attempts via postcard to schedule inspection; no response	6/30/2021	Building Families First Community Development Organization
7258 Wykes	11/12/2020	No Documentation	2 outreach attempts via phone and letter requesting documentation. Failed to provide eligibility documents	12/9/2021	Building Families First Community Development Organization
15750 Ferguson	8/16/2021	Insufficient Funds	4 outreach attempts via mail and telephone to collect BB payment. Failed due to insufficient funds	3/3/2022	Building Families First Community Development Organization

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11308 W Outer Drive	11/19/2018	Insufficient Funds	3 outreach attempts via phone to collect BB payment. Failed due to insufficient funds	3/30/2022	Building Families First Community Development Organization
18675 Asbury Park	8/27/2020	No Documentation	4 outreach attempt phone and letter to collect eligibility documents. Failed to provide eligibility documents.	3/3/2021	Empowerment and Development Housing Resource Center
6798 Asbury Park	1/17/2018	Insufficient Funds	3 outreach attempt via phone and letter an collect BB payment. Failed due to insufficient funds.	11/17/2021	Empowerment and Development Housing Resource Center
8582 Alpine	7/18/2022	No Documentation	3 outreach attempts via phone and letter to collect eligibility documentation. Failed to provide eligibility documentation.	2/15/2023	Faith In Girls, Inc.
13660 Washburn	6/13/2019	No Documentation	2 outreach attempts to collect eligibility documentation. Failed to provide eligibility documentation.	2/25/2020	IHeart Realty Foundation, Inc.
20030 Ohio	2/7/2019	No Documentation	3 outreach attempts via phone and letter to collect eligibility documentation. Insufficient documentation.	7/8/2020	IHeart Realty Foundation, Inc.
9569 Bessemore	7/13/2020	Unresponsive	2 outreach attempts via postcarding, no SIO came forth	6/4/2021	IHeart Realty Foundation, Inc.
13580 Stoepel	5/15/2019	Unresponsive	2 outreach attempts via postcarding, no SIO came forth	10/22/2020	IHeart Realty Foundation, Inc.
19432 Moross	7/2/2018	Non-compliant	3 outreach attempts via phone to schedule property inspection; no response	5/13/2021	IHeart Realty Foundation, Inc.
15044 Bringard Dr	11/19/2018	Non-compliant	3 outreach attempts via inventory postering, no SIO came forth	5/29/2019	LifeBUILDERS
15240 Bringard Dr	10/24/2018	Unresponsive	3 outreach attempts via inventory postering and postcard, no SIO came forth	9/17/2019	LifeBUILDERS

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16281 E State Fair	10/8/2020	Part-time Occupant	Per policy Part-time occupants do not qualify for Buyback Program. Participant failed out for occupying property less than a year	4/7/2021	LifeBUILDERS
14571 Lappin	12/3/2018	Unresponsive	3 outreach attempts via postcard and letter, no SIO came forth	7/24/2019	Little Rock Missionary Baptist
15243 Rossini Drive	11/19/2018	Unresponsive	2 outreach attempts via postcard and inventory postering, occupant was unresponsive and did not provide eligibility documentation	3/19/2019	Little Rock Missionary Baptist
576 Belmont	9/5/2018	No Documentation	2 outreach attempts via phone, SIO ineligible no documentation	7/26/2019	Little Rock Missionary Baptist
14210 Rutherford	2/5/2018	No Documentation	3 outreach attempts via phone and letter to collect eligibility documentation. Insufficient documentation.	10/22/2020	Little Rock Missionary Baptist
20277 Winthrop	8/10/2018	No Documentation	3 outreach attempts via phone to schedule inspection; no response	7/24/2019	Little Rock Missionary Baptist
9565 Cheyenne	2/6/2020	No Documentation	4 outreach attempts via letter and phone to collect eligibility documentation. Failed to provide eligibility documentation.	8/17/2020	Little Rock Missionary Baptist
14150 Edmore Dr	11/19/2018	Non-compliant	3 outreach attempts via inventory postering to collect eligibility documentation. Failed to provide eligibility documentation.	3/19/2019	Little Rock Missionary Baptist
9982 Littlefield	12/2/2019	Unresponsive	3 outreach attempts via inventory postering and postcard, no SIO came forth	2/17/2021	Little Rock Missionary Baptist
1669 W Philadelphia	8/31/2017	Unresponsive	Outreach attempts via postcard, occupant was unresponsive and did not provide sufficient eligibility documentation	7/24/2019	Little Rock Missionary Baptist
17425 Fenton	8/10/2018	No Documentation	3 outreach attempts via phone, occupant failed to provide sufficient eligibility documentation.	6/25/2020	Little Rock Missionary Baptist

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5510 Drexel	5/15/2018	Non-compliant	2 outreach attempts via letter and phone, no documentation received to determine eligibility	2/1/2019	Man Power Mentoring, Inc
13413 Jane	12/6/2017	Unresponsive	Occupant did not respond to 3 postcards sent to property	11/20/2018	Man Power Mentoring, Inc
12106 Rutherford	7/2/2018	Non-compliant	Unable to schedule inspection. Attempt to contact via phone at least 3 times over 4 mos. period	8/20/2020	Man Power Mentoring, Inc
18683 Hasse	12/6/2017	Unresponsive	Occupant did not respond to 2 postcards or letters sent to property	8/6/2019	Man Power Mentoring, Inc
20105 Strasburg	8/17/2017	Unresponsive	Occupant Non responsive. Did not complete HPC program. 3 letters mailed requesting course completion. Given 8 months before failing out.	3/29/2019	Man Power Mentoring, Inc
18855 Bloom	5/15/2018	Non-compliant	Unable to schedule inspection. Attempted to contact via phone at least 3 times over 4 mos. period	6/6/2019	Man Power Mentoring, Inc
20123 Charest	2/28/2019	Non-compliant	Occupant never submitted sufficient Proof of occupancy. Standard attempts made to obtain. 2 Letters 3 calls	9/24/2019	Man Power Mentoring, Inc
20206 Helen	2/20/2020	No Documentation	Occupant never submitted sufficient Proof of occupancy. Standard attempts made to obtain. 3 letter 3 calls.	6/30/2021	Man Power Mentoring, Inc
5291 Lakewood	5/15/2018	Non-compliant	Unable to schedule inspection. Attempted to contact via phone at least 3 times over 4 mos. period	2/1/2019	Man Power Mentoring, Inc
18686 Alcoy	7/2/2018	Non-compliant	Occupant never submitted sufficient proof of occupancy nor did they schedule required inspection. Attempted contact 3 times via phone.	8/20/2020	Man Power Mentoring, Inc

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20563 Hamburg	8/31/2017	Unresponsive	Occupant Non responsive. Never submitted sufficient proof of occupancy.	5/1/2019	Man Power Mentoring, Inc
19572 Alcoy	9/10/2020	No Documentation	Occupant moved into property (2019) approximately 2 years after obtaining info on home from DLBA. Occupant admitted to moving in due to property vacancy. Unable to provide required proof of occupancy documents.	4/7/2021	Man Power Mentoring, Inc
9177 Bishop	10/24/2018	No Documentation	Inventory postering twice, determined occupied. Occupant would not come forward to identify themselves to be vetted for program.	10/1/2019	Man Power Mentoring, Inc
18711 Syracuse	1/13/2020	No Documentation	Occupant submitted purchase inquiry and subsequently identified as an occupant 3 mos later. Still allowed opportunity to be vetted for BB. 3 outreach attempts via phone and letters to obtain sufficient documentation. Documents submitted insufficient. Occupant never submitted sufficient documentation to prove occupancy.	6/9/2021	Man Power Mentoring, Inc
18061 Binder	4/8/2019	No Documentation	Occupant never submitted sufficient proof of occupancy. 6 outreach attempts via phone and letters.	2/3/2021	Man Power Mentoring, Inc
15300 Faircrest	5/23/2019	Non-compliant	Failed to complete required HPE course. 3 letters mailed requesting HPE assessment completion	2/11/2021	Man Power Mentoring, Inc
854 Solvay	7/13/2020	Non-compliant	Occupant qualified but failed to complete HPE requirements. 3 letters mail requesting HPE assessment completion	11/22/2022	Michigan Investor Group, LLC

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3919 St Clair	11/5/2021	No Documentation	Occupant could not produce qualifying documentation after 2 outreach attempts. Occupant admitted he was not occupancy the property but had been repairing.	8/11/2022	Michigan Investor Group, LLC
3818 Humphrey	4/19/2021	No Documentation	Occupant could not produce qualifying documentation after 7 months of attempting to obtain. Outreach to obtain documents attempted 5 times via phone calls and letters.	9/14/2022	Michigan Investor Group, LLC
3812 Virginia Park	5/28/2019	Non-compliant	Occupant qualified after multiple attempts but failed to complete inspection or HPE requirements or multiple requests.	9/14/2022	Michigan Investor Group, LLC
3748 Wager	4/6/2018	No Documentation	5 attempts in person and via phone to obtain eligibility documentation. Multi unit property, SIO was renting from other occupant, no lease agreement no payment receipts.	2/14/2023	Michigan Investor Group, LLC
12960 Winthrop	6/28/2018	Non-compliant	Occupant provided lease for legal connection, utilities bill provided was for a different address. 3 contact attempts opportunities to submit sufficient occupancy documents over more than 12 mos. documents never provided.	10/26/2020	Michigan Mercy Housing
12661 Riad	5/15/2018	Non-compliant	Occupant was a renter. Never submitted Legal connection or proof of occupancy documents. Outreach attempted 5 times via phone to obtain eligibility documents	4/18/2019	National Faith Homebuyers
9176 Bishop	2/25/2019	Unresponsive	Occupant unresponsive. Property postered and standard attempts made to reach out via 4 letters mailed to home.	11/14/2019	National Faith Homebuyers

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148 Leicester Ct	10/24/2018	Unresponsive	Property postered. 2017 occupant determined to be squatter. No viable occupant ever identified themselves. Final opportunity letter mailed 10/2018 rtd by Post office.	6/29/2020	Rebound Community Development Corporation
8894 Asbury Park	8/30/2019	Part-time Occupant	2 previous SIO's neither qualified. #1 2017-2018 no legal connection or qualifying occupancy documents,#2 moved into property part time 2019. admitted to only living in property during summer months.	5/7/2021	Rebound Community Development Corporation
10400 E Outer Drive	11/20/2019	No Documentation	Occupant didn't qualify. Submitted purchase inquiry 5/2017. Subsequently identified herself as an occupant 10/2019. Unable to provide sufficient occupancy documentation. 10/2016 Squatter identified at property was still at property 9/2017.	2/12/2020	Young Leaders For Excellence, Inc.
6080 Penrod	7/20/2018	Non-compliant	Occupant qualified but failed to complete HPE requirement after. Notified via mailed 3 times to complete HPE assessment.	6/26/2020	Young Leaders For Excellence, Inc.
11633 Somerset	3/9/2018	Non-compliant	Occupant never submitted sufficient proof of occupancy documentation. Worked with for 19 mos before failing out.	4/23/2021	Young Leaders For Excellence, Inc.
9162 Montrose	1/4/2019	Non-compliant	At least 2 individuals came forwarding claiming to have purchased property. Sufficient documentation never received to complete vetting for any of them.	1/12/2021	Young Leaders For Excellence, Inc.
6344 Minock	12/3/2018	Unresponsive	Occupant did not respond to 2 postcards or 4 letters sent to property	4/23/2021	Young Leaders For Excellence, Inc.

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12518 Elmdale	2/5/2018	No Documentation	2 outreach attempts, occupant failed to provide documentation.	9/21/2022	Man Power Mentoring, Inc
20007 Birwood	1/17/2020	Unresponsive	3 outreach attempts, occupant unresponsive to outreach efforts.	10/24/2022	Building Families First Community Development Organization
4174 Balfour	6/26/2019	Unresponsive	3 outreach attempts, occupant unresponsive to outreach efforts.	12/3/2020	National Faith Homebuyers
17941 Mcdougall	9/23/2020	No Documentation	3 outreach attempts, occupant failed to provide sufficient documentation.	8/20/2021	Rebound Community Development Corporation
14936 Coram	12/17/2021	No Documentation	3 outreach attempts, occupant failed to provide sufficient documentation.	4/3/2023	Redeem Programs
1672 Glynn Ct	3/18/2020	No Documentation	3 outreach attempts, occupant failed to provide sufficient documentation.	8/11/2022	Michigan Investor Group, LLC
3740 Wager	1/30/2018	No Documentation	3 outreach attempts, occupant failed to provide documentation.	4/11/2023	Michigan Investor Group, LLC
2627 Glynn Ct	7/26/2019	Non-compliant	4 outreach attempts, occupant failed to provide sufficient documentation.	12/12/2022	Faith In Girls, Inc.
3738 Virginia Park	8/10/2018	No Documentation	3 outreach attempts, occupant failed to provide documentation.	3/29/2023	Faith In Girls, Inc.
5109 Chatsworth	5/30/2018	No Documentation	3 outreach attempts, occupant failed to provide sufficient documentation.	7/20/2022	Young Leaders For Excellence, Inc.
231 Englewood	12/5/2015	Non-compliant	3 outreach attempts, occupant failed to provide sufficient documentation.	9/22/2021	Young Leaders For Excellence, Inc.
20030 Stoepel	7/24/2019	No Documentation	3 outreach attempts, occupant failed to provide sufficient documentation.	10/26/2020	Michigan Mercy Housing
9393 Montrose	3/30/2021	Insufficient Funds	4 outreach attempts, occupant was unresponsive and failed to pay required Buy Back payment.	9/30/2021	Michigan Mercy Housing
612 Trowbridge	3/7/2019	Unresponsive	3 outreach attempts, occupant unresponsive to outreach efforts.	7/20/2022	Young Leaders For Excellence, Inc.

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