



U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT WASHINGTON,
DC 20410-8000

OFFICE OF HOUSING

MAR 7 2017

Steven A. Benham, Sr.
Executive Director
Hopewell Redevelopment and Housing Authority (HRHA)
350 East Poythress Street
P.O. Box 1361
Hopewell, VA 23860

David Schultz
President
Langston Park Apartments, LLC
1004 Langston Park
Hopewell City, VA 23860-5148

Janaka Casper
President
Community Housing Partners
1013 Langston Park
Hopewell, VA 23860-5156

Re: Hopewell, VA

Dear Mr. Benham, Mr. Schultz and Mr. Casper,

Please be advised that the U.S. Department of Housing and Urban Development has received notification of alleged violations of statutory, regulatory and programmatic requirements in connection with activities at the former public housing communities of Langston Park and Kippax Place (collectively, the Properties). The allegations include concerns regarding relocation laws, economic displacement, program compliance and construction quality, among other issues, associated with the conversion of the properties under the Rental Assistance Demonstration (RAD) and associated construction activities.

We are requesting your cooperation as the Department investigates these allegations. This investigation is being conducted under the RAD, Section 8, public housing and HOME Investment Partnerships Program (HOME) programs, and also under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and Section 104(d) of the Housing and Community Development Act of 1974 (section 104(d)).

Please note, the Department will also be conducting discussions with the Commonwealth of Virginia regarding any actions the Commonwealth may take as the administrator of the HOME funds committed to either of the properties.

HUD's Office of Fair Housing and Equal Opportunity will be conducting a parallel investigation to consider complaints under Section 504 of the 1973 Rehabilitation Act, 42 U.S.C. 794 and its implementing regulations, the Fair Housing Act and other civil rights statutes.

During these investigations, the Department will seek information from your organizations to determine the facts of the situation. Your organizations can expect to be contacted by staff from HUD's Richmond and Philadelphia Field Offices and from the Department's Washington Headquarters representing the various program interests. Department staff will request financial and project reports, records, statements and documents, and we request your cooperation in providing this information, to the extent in your possession, promptly and in the form requested. We will supplement the documentary review with an on-site review at the Properties and/or the HRHA offices. We may also seek to interview key organizational staff and/or the complainants. In connection with these investigations, we request the following information, as available, related to the properties or residents of the properties:

1. Ownership and management entities, organizational charts and relationships;
2. Relevant excerpts or amendments to HRHA's Five Year Plan, Annual Plan, Admissions and Continued Occupancy Policy and Section 8 Administrative Plan relating to the RAD conversions and the Choice Mobility program;
3. Management policies and practices, including grievance procedures and policies, house rules or standards of behavior for tenants, which are relevant to relocation and implementation of the RAD conversion;
4. Any applicable written relocation plan or contemporaneous documentation of relocation policies and, if different, a description of the implemented relocation policies;
5. Form documents used in connection with resident rights and obligations, including the standard form tenant lease and samples of relocation-related notices and forms;
6. A census of households, with applicable relocation activities, notices, payments and relocation status noted, for the residents in occupancy on or after the date of the RAD application or the date of the application for HOME funds, whichever is earlier. We are providing suggested templates for this information as Attachment A (for Summit) and Attachment B (for Kippax), as we would appreciate receiving it in the live electronic spreadsheet. For any household that did not exercise their right to return, please either indicate in the comments column or in a separate document the reason each household did not return.
7. For the seven households identified in the complaint ([REDACTED]), tenant files including grievance files, relocation files, correspondence regarding relocation benefits and incentive payments, if any, Housing Choice Voucher application files and Choice Mobility application files;

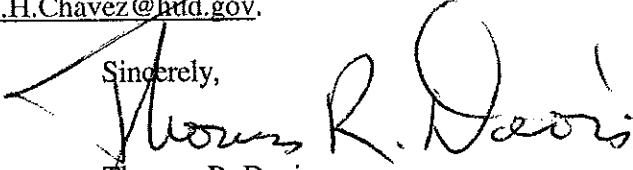
8. Records to inform HUD's monitoring of construction completion, quality of construction and compliance with HOME and contractual obligations under the RCC, such as records of inspections conducted by code enforcement agencies, inspection records from other state or local regulatory agencies (including HRHA), certificates of occupancy, Section 8 Housing Quality Standards (HQS) inspection records, cost certifications and completion certificates;
9. Number and identification of households using accessible features (including reasonable accommodations) at the time of RAD application, during relocation and post-construction.

We would appreciate you providing these materials in electronic format. Please note that the information requested includes private personal information. The Department takes significant measures to protect such information and requests that assists in protecting this information when you provide the documents to us. Please encrypt electronic files that are sent to us and send such electronic files in a manner appropriate to protect this information.

We would appreciate receiving documentation for our desk review no later than March 30, 2017. We will follow-up with you regarding any additional information we may need and regarding HUD's site visit and personal interviews, as appropriate, which will occur after our desk review. Please feel free to supplement these items with any other documentation you consider relevant for demonstrating compliance with the terms of the RAD Conversion Commitments (RCC) and the applicable programs.

We appreciate your cooperation and assistance as we investigate these allegations and will be in contact with you in the next several days to confirm the logistics and details of this request. If, at any time, you wish to verify the authority of someone purporting to request information in connection with this investigation, please contact either Lisa Floyd, Office of Recapitalization, at 202-402-6275 or Lisa.C.Floyd@hud.gov, or Catherine D. Lamberg, Director of Public Housing, HUD Richmond Office at 804-822-4898 or Catherine.D.Lamberg@hud.gov. In addition, if you have any questions, also feel free to contact Ms. Floyd or Ms. Lamberg, as they will be coordinating the non-fair housing portions of this investigation on behalf of the Department. For questions regarding the fair housing investigations, please contact Roberto Chavez, at 215-861-7625 or Roberto.H.Chavez@hud.gov.

Sincerely,


Thomas R. Davis
Director
Office of Recapitalization

Enclosures:

- Attachment A – List of Relocation-related data elements for Submission for Summit (electronic spreadsheet to be sent separately)
- Attachment B – List of Relocation-related data elements for Submission for Kippax Place (electronic spreadsheet to be sent separately)



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Kimberly A. Rolla
Legal Aid Justice Center
1000 Preston Ave. Suite A
Charlottesville, VA 22903

Helen Hardiman
Housing Opportunities Made Equal
626 E. Broad St. Suite 400
Richmond, VA 23219

Re: Langston Park and Kippax Place
Hopewell, VA

Dear Ms. Rolla and Ms. Hardiman,

This letter is in response to your correspondence to various offices of the Department of Housing and Urban Development on December 8, 2016. Your letters allege violations of statutory, regulatory and programmatic requirements in connection with activities at the former public housing communities of Langston Park and Kippax Place associated with the conversion of the properties under the Rental Assistance Demonstration (RAD) and associated construction activities.

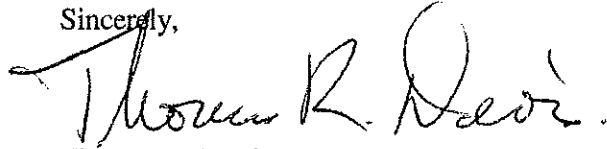
Thank you for bringing these issues to our attention. We are investigating these allegations. The scope of our inquiry includes actions with respect to the individuals named in your correspondence, as well as actions with respect to all other residents of the two properties and general program compliance. The Hopewell Redevelopment and Housing Authority, Langston Park Apartments, LLC, and Community Housing Partners have been notified of the Department's investigation and are expected to cooperate fully.

The investigation is being conducted under the RAD, Section 8, public housing and HOME Investment Partnerships Program (HOME) programs, and also under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and Section 104(d) of the Housing and Community Development Act of 1974 (section 104(d)).

HUD's Office of Fair Housing and Equal Opportunity will be conducting a parallel investigation to consider complaints under Section 504 of the 1973 Rehabilitation Act, 42 U.S.C. 794 and its implementing regulations, the Fair Housing Act and other civil rights statutes.

If, at any time, you wish to contact the Department regarding this investigation please contact either Lisa Floyd, Office of Recapitalization, at 202-402-6275 or Lisa.C.Floyd@hud.gov, or Catherine D. Lamberg, Director of Public Housing, HUD Richmond Office at 804-822-4898 or Catherine.D.Lamberg@hud.gov as they will be coordinating the non-fair housing portions of this investigation on behalf of the Department. For questions regarding the fair housing investigations, please contact Roberto Chavez, at 215-861-7625 or Roberto.H.Chavez@hud.gov.

Sincerely,

A handwritten signature in black ink that reads "Thomas R. Davis". The signature is written in a cursive style with a large, prominent initial "T".

Thomas R. Davis
Director
Office of Recapitalization