

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

WAKE COUNTY

SUPERIOR COURT DIVISION

FILE NO. FILED

2022 MAY 13 P 12:46

THE STATE OF NORTH CAROLINA, *ex rel.*)
JOSHUA H. STEIN, Attorney General,)

WAKE COUNTY, C.S.C.

Plaintiff,)

BY _____
COMPLAINT

v.)

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

HITS TAX & BOOKKEEPING SERVICES, LLC;)

**MOTION FOR PRELIMINARY
INJUNCTION**

MARVIN T. HOOKER;)

ERICA KIMBRO HOOKER; and,)

TRINITY KIMBRO,)

Defendants.)

Plaintiff, State of North Carolina, *ex rel.* Joshua H. Stein, Attorney General (the “State” or “Plaintiff”), brings this action against Defendants HITS Tax & Bookkeeping Services, LLC, Marvin T. Hooker, Erica Kimbro Hooker, and Trinity Kimbro (“Defendants”) pursuant to the North Carolina Unfair and Deceptive Trade Practices Act, N.C. Gen. Stat. §§ 75-1.1, *et seq.* In support of its Complaint, Plaintiff alleges as follows:

INTRODUCTION

Defendants deceptively promote and advertise government-backed COVID-19 pandemic financial assistance programs, and solicit customers for whom they can allegedly provide “assistance” in applying for such programs. Once an individual contacts Defendants to inquire about these financial relief programs, Defendants interpose HITS Tax & Bookkeeping Services LLC as an unnecessary middleman between the applicant and the program administrator, for the sole purpose of charging substantial application fees. In reality, North Carolina tenants and

homeowners can easily apply for and obtain this financial assistance *at no cost* directly through the appropriate state agencies administering such programs. Moreover, in order to generate additional illegitimate application fees, Defendants deceptively and falsely assure consumers that they will be approved for these relief programs if they submit their applications through HITS Tax & Bookkeeping Services LLC, and provide false contact information on individual consumers' applications in an attempt to prevent individual applicants from communicating directly with the program administrators. Consequently, Defendants deliberately exploit taxpayer-funded programs intended to help struggling homeowners and tenants stabilize their finances, and use those programs as a means to seize upon those financially vulnerable individuals for Defendants' own profit and gain.

The State alleges violations of the Unfair and Deceptive Trade Practices Act, N.C. Gen. Stat. § 75-1.1; and is seeking injunctive relief, civil penalties, restitution for victims, attorneys' fees, and other costs pursuant to N.C. Gen. Stat. §§ 75-14, 75-15.1, 75-15.2, and 75-16.1.

PARTIES

1. Plaintiff is the State of North Carolina, acting on relation of its Attorney General, Joshua H. Stein, who brings this action pursuant to authority found in Chapters 75 and 114 of the North Carolina General Statutes.

2. Defendant HITS Tax & Bookkeeping Services LLC is a North Carolina Limited Liability Corporation with its principal place of business in Burlington, North Carolina.

3. Upon information and belief, Defendant Marvin T. Hooker is a resident of Alamance County, North Carolina.

4. Defendant Marvin T. Hooker is the owner, organizer, managing member, and principal operator of Hits Tax & Bookkeeping Services LLC (hereinafter "HTBS").

5. Upon information and belief, Defendant Erica K. Hooker is a resident of Alamance County, North Carolina, and is married to Defendant Marvin T. Hooker.

6. Defendant Erica K. Hooker is a member and employee of HTBS.

7. Upon information and belief, Defendant Trinity Kimbro is a resident of Alamance County, is the daughter of Marvin T. Hooker and Erica K. Hooker, and is also an employee of HTBS.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to N.C. Gen. Stat. §§ 75-1.1 and 75-15 because the acts or practices alleged herein are in or affecting commerce in North Carolina.

9. This Court has personal jurisdiction over Defendants because Defendants are located in North Carolina, conducted business here in North Carolina, and the acts or practices alleged herein occurred in North Carolina.

10. Venue is proper in Wake County pursuant to the Attorney General's selection under N.C. Gen. Stat. § 75-14.

FACTUAL BACKGROUND

11. HTBS has previously advertised and is currently advertising that in addition to providing tax preparation services, it offers services to individuals applying for financial relief programs stemming from the COVID-19 coronavirus pandemic, and specifically, with the programs discussed in further detail below.

The Homeowners Assistance Fund ("HAF") Program

12. The federal HAF Program was created by Congress through its enactment of the American Rescue Plan in response to the COVID-19 coronavirus pandemic to provide mortgage

and mortgage-related financial assistance to homeowners adversely impacted by the pandemic.¹

13. The federal HAF Program is administered in North Carolina by the North Carolina Housing Finance Agency.

14. According to the North Carolina Housing Finance Agency's website:

The NC Homeowner Assistance Fund is being administered by the NC Housing Finance Agency using \$273 million that was allocated to North Carolina under the American Rescue Plan to prevent mortgage delinquencies, defaults, displacements, and foreclosures for homeowners experiencing financial difficulties due to the coronavirus pandemic. This program is being supported, in whole or in part, by federal [funding] awarded to the State of North Carolina by the US Department of the Treasury.

For qualified homeowners, the fund offers:

- Housing payment assistance for primary residence in North Carolina (for example, single-family home, townhome, condo or mobile home).
- Assistance for mortgage reinstatement to catch up on late payments (first and second mortgages) or other housing-related costs due to a period of forbearance, delinquency or default.
- Assistance covering other housing-related costs such as homeowner's insurance, flood insurance, mortgage insurance, homeowner's association dues/fees or delinquent property taxes to prevent foreclosure.

There is no cost to participate in the NC Homeowner Assistance Fund.²
(emphasis supplied in original)

The HOPE Rental and Utilities Assistance Program

15. The North Carolina Housing Opportunities and Prevention of Evictions (HOPE) Program is managed by the North Carolina Office of Recovery and Resiliency ("NCORR"), a division of the state Department of Public Safety. The HOPE Program provided rent and utility

¹ See Text - H.R.1319 - 117th Congress (2021-2022): American Rescue Plan Act of 2021, H.R.1319, 117th Cong. (2021), <https://www.congress.gov/bill/117th-congress/house-bill/1319/text>.

² See <https://www.nchfa.com/current-homeowners/are-you-struggling-pay-your-mortgage>, last visited March 24, 2022.

bill assistance to low-income tenants who had been financially impacted by the COVID-19 pandemic. The program was designed to help North Carolina renters stay safe in their homes by preventing evictions and loss of utility services. HOPE Program funding was provided to the state through U.S. Department of Housing and Urban Development Community Development Block Grant–Coronavirus Relief and U.S. Department of Treasury Coronavirus Relief Fund allocations, and the Emergency Rental Assistance Program established by the Consolidated Appropriations Act 2021.³

16. The HOPE Program began accepting applications in October, 2020 and stopped taking applications on December 17, 2021, once all of the program funding had been exhausted.

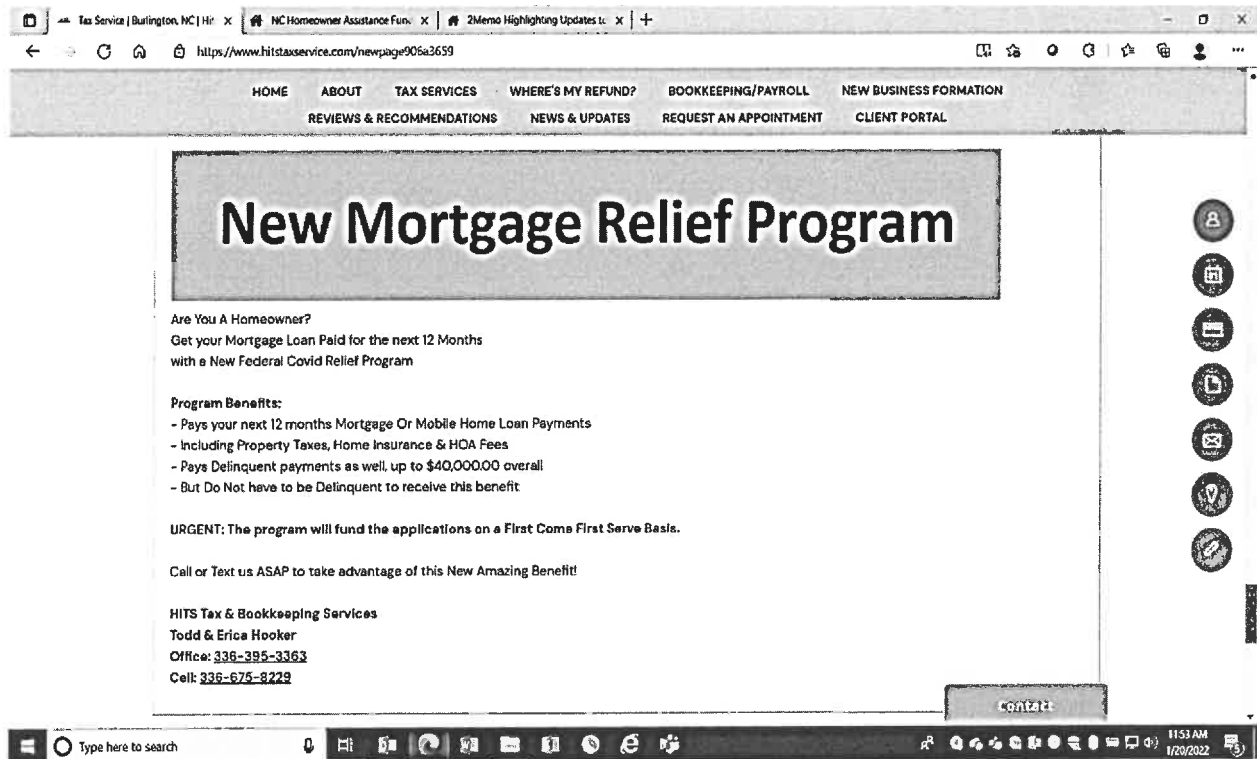
17. An initial intake period for the HOPE Program prioritized and exclusively served applicants earning less than or equal to 50 percent of the area median income (“AMI”), which is considered very low-income. Between June 15, 2021, and December 17, 2021, intake for applicants expanded to 80 percent of the AMI. Applicants that were unemployed for 90 days or greater at the time of program application, and did not otherwise meet the income eligibility requirements, were reviewed for eligibility to also prioritize that group for assistance.⁴

HTBS’s Conduct and Business Practices Regarding the HAF Program

18. HTBS has advertised via its internet website that there is a “NEW MORTGAGE RELIEF PROGRAM” for which HTBS can assist homeowners in applying. This advertisement represents that the program benefits, among others, include “Pay[ment of] your next 12 months Mortgage Or Mobile Home Loan Payments” and explicitly, and falsely, states that homeowners “Do Not have to be Delinquent to receive this benefit.” A screenshot of the HTBS webpage from January 20, 2022 appears below.

³ See <https://www.rebuild.nc.gov/hope-program/about>, last visited March 23, 2022.

⁴ *Id.*



19. The “NEW MORTGAGE RELIEF PROGRAM” captured in the screenshot included in paragraph 18, above, refers to the federal HAF Program administered by the North Carolina Housing Finance Agency; however, HTBS’s webpage makes no reference to the fact that such funds are from the HAF Program, which is administered at no cost through the North Carolina Housing Finance Agency (“NCHFA”).

20. Homeowners can apply for this assistance directly through the NCHFA online, via telephone, or with the assistance of a HUD-approved housing counselor at no cost to the homeowner. (See Affidavit of Claudia Young, NCHFA, paragraphs 8 - 10, attached hereto as Exhibit A and incorporated by reference herein.)

21. As reflected in the attached affidavits, HTBS is charging homeowners \$200 to submit a HAF application to the NCHFA on their behalf, and is not informing applicants that they can apply for HAF Program assistance at no cost directly through the NCHFA. The HTBS

webpage screenshot in paragraph 18, above, does not disclose the \$200 application fee that HTBS is charging homeowners to apply for the HAF Program funding.

22. HTBS has created unique email addresses for consumer applicants to which *only* HTBS has access and is providing this false and incorrect email contact information to the NCHFA without the homeowners' knowledge or consent when submitting their applications to the NCHFA.

23. Upon information and belief, HTBS is providing such false email contact information to ensure that all correspondence with the NCHFA regarding a homeowner's application is conducted through HTBS, in an effort to prevent homeowner applicants from speaking directly with the North Carolina Housing Finance Agency about their applications.

24. As alleged in paragraph 18, above, HTBS is falsely representing to consumer applicants that they "Do Not have to be Delinquent" in order to receive the mortgage-related financial assistance.

25. Pursuant to HAF Program eligibility criteria from the NCHFA, applicants who are current on their mortgage, property taxes, homeowners insurance, and homeowners association dues *are not eligible* for financial assistance under the HAF Program. (*See* Affidavit of Claudia Young, NCHFA, paragraph 12, attached hereto as Exhibit A and incorporated by reference herein.)

26. As reflected in the allegations below and attached affidavits, HTBS has also consistently misrepresented the status of applications to homeowner applicants regarding documents that have allegedly been submitted on the homeowners' behalf in support of their HAF Program applications.

27. Defendants' misrepresentations, omissions, and failure to timely provide supporting documentation provided by homeowners in support of their applications could lead to otherwise avoidable foreclosure actions, resulting in the loss of applicants' homes.

The Koray Savage HAF Application

28. Homeowner, Koray Savage, completed the HAF Program mortgage assistance application process while in the office of HTBS on or about January 19, 2022. (*See* Affidavit of Koray Savage, attached hereto as Exhibit B and incorporated by reference herein.)

29. Mr. Savage informed HTBS that he was current on his mortgage loan and property taxes. Nonetheless, Mr. Savage was assured by HTBS that because he had a reduction in income due to the COVID-19 coronavirus pandemic, he met the eligibility criteria to receive financial assistance through the HAF Program.

30. Despite having suffered a financial hardship due to the COVID-19 coronavirus pandemic, because Mr. Savage was not delinquent on his mortgage loan, property taxes, or homeowners association dues/fees, the information HTBS provided Mr. Savage regarding his eligibility was deceptive and incorrect. (*See* Affidavit of Claudia Young, NCHFA, paragraph 12, attached hereto as Exhibit A and incorporated by reference herein.)

31. Based on the false and misleading information that HTBS provided Mr. Savage about his eligibility for the HAF Program assistance, Mr. Savage paid HTBS the \$200 application fee on or about January 19, 2022.

32. Mr. Savage was later told by the NCHFA case manager assigned to his application that, in accordance with the HAF Program eligibility guidelines, he was not eligible for the HAF Program assistance because he was current on his mortgage and property taxes at the time of his application.

33. Because Mr. Savage did not have sufficient funds to pay both the HTBS application fee and his next monthly mortgage payment, he was not able to make his next monthly mortgage payment on time.

34. As a direct result of the false and misleading information that HTBS provided Mr. Savage about the HAF Program, he then defaulted on his mortgage.

35. Further, when speaking with his NCHFA case manager about his application, Mr. Savage also learned that HTBS created and provided a false email address in connection with the application that HTBS submitted on his behalf.

36. This false email address was created without Mr. Savage's consent or knowledge, and was purposefully created and provided by HTBS in order to direct all email correspondence regarding Mr. Savage's application from the NCHFA through HTBS, and to prevent Mr. Savage from communicating directly with the NCHFA regarding his HAF Program application.

The Bobby Everhart HAF Application

37. Homeowner, Bobby Everhart, completed the HAF Program mortgage assistance application process while in the office of HTBS on or about January 19, 2022. (See Affidavit of Bobby Everhart, attached hereto as Exhibit C and incorporated by reference herein.)

38. Mr. Everhart learned about HTBS and the mortgage assistance program from his granddaughter, Wendy Cranford, who had received an unsolicited text message from HTBS about a new mortgage loan financial assistance program. (See Affidavit of Wendy Cranford, attached hereto as Exhibit D and incorporated by reference herein.)

39. Ms. Cranford did not sign up to receive text messages from HTBS. (See Affidavit of Wendy Cranford, paragraphs 5 & 6, attached hereto as Exhibit D and incorporated by reference herein.)

40. Similar to Mr. Savage, Mr. Everhart was not told by HTBS that he could apply for the HAF Program assistance at no cost directly through the NCHFA, and was not told that being current on his mortgage and property taxes would disqualify him for HAF Program assistance.

41. Because HTBS assured him that he was eligible for the HAF Program assistance, Mr. Everhart paid \$200 to HTBS to submit a HAF Program application on his behalf.

42. HTBS also created a false email address for Mr. Everhart without his knowledge or consent, and provided that email address to the NCHFA when HTBS submitted Mr. Everhart's application.

43. Despite having provided the requisite application information and supporting documentation to HTBS on or about January 19, 2022, approximately three weeks passed without Mr. Everhart receiving any updates from HTBS on the status of his application.

44. On or about February 7, 2022, Mr. Everhart and his granddaughter, Wendy Cranford, contacted HTBS requesting an update on Mr. Everhart's application. Ms. Cranford was falsely advised by HTBS that Mr. Everhart's application had been submitted, but that because of the heavy volume of applications being received by the NCHFA, there was a backlog that was causing delays. (*See Cranford Affidavit, paragraph 14; Everhart Affidavit, paragraph 9.*)

45. Mr. Everhart continued to wait for updates regarding his application through HTBS, and because he had received no such update, Ms. Cranford ultimately contacted the NCHFA directly to inquire about Mr. Everhart's application.

46. On or about February 18, 2022, the NCHFA representative informed Mr. Everhart and Ms. Cranford that no supporting documentation had been submitted in connection with his application. (*See Cranford Affidavit, paragraph 16; Everhart Affidavit, paragraph 10.*)

47. Mr. Everhart was informed by the NCHFA that, contrary to what he was told by HTBS, only one page of a pre-application document had been submitted on February 7, 2022—the same day that Ms. Cranford contacted HTBS—and that a full application package had not been received by the NCHFA at that time.

48. Mr. Everhart was also informed by the NCHFA that because he was current on his mortgage and property taxes at the time that his initial application information was submitted by HTBS, he was not eligible for financial assistance through the HAF Program.

The William Poteat HAF Application

49. Homeowner, William Poteat, completed the HAF Program mortgage assistance application process while in the office of HTBS on or about January 25, 2022. (See Affidavit of William Poteat, attached hereto as Exhibit E and incorporated by reference herein.)

50. As with Mr. Savage and Mr. Everhart, Mr. Poteat paid HTBS \$200 to submit his application, was not told by HTBS that he could apply at no cost directly through the NCHFA, and was falsely told that he was eligible for the HAF Program funding despite the fact that he was current on his mortgage and property taxes.

51. HTBS also created a false email address for Mr. Poteat without his knowledge or consent, and provided that email address to the NCHFA when HTBS submitted Mr. Poteat's application.

52. On or about February 2, 2022, the application submitted by HTBS on behalf of Mr. Poteat was placed on hold by the NCHFA due to concerns regarding the HTBS-created email address from the application belonging to a third party instead of the homeowner, and the case manager ceased communication regarding Mr. Poteat's application.

53. As such, Mr. Poteat's application for HAF assistance was directly hindered and deterred as a result of HTBS's interposition in his application effort.

The Rhonda Tate HAF Application

54. Homeowner, Rhonda Tate, completed the HAF Program mortgage assistance application process while in the office of HTBS on or about January 15, 2022. Ms. Tate paid HTBS

\$200 to complete and submit her application for HAF Program assistance. (*See* Affidavit of Adrienne Glover, attached hereto as Exhibit F and incorporated by reference herein.)

55. Approximately one month later, on February 17, 2022, Ms. Tate received an email “update” regarding her application from Defendant Marvin T. Hooker of HTBS which stated the following:

- (a) “Please remember that this is a new program of about 3 weeks in. Their original estimated turnaround time was 3 weeks. They have now changed that to 8 weeks estimated turnaround. This is due to them still working out some kinks in the application and process. Such as, if you have received a phone call already from a case manager, and they told you that you're not eligible because you're not behind on your mortgage, and this is not in line with the program eligibility requirements. They are working on implementing an appeal process on their end so that you can still receive the mortgage assistance benefit of this program.”
- (b) “Additionally, they told us today that you will now be receiving an email response to your application and to give them up to 8 weeks for their response. Please check your email for NC HOME or NC Homeowners Association in case you have overlooked and if not, please keep an eye out on your email.”
- (c) “We will continue to assist you with this application process in any way we can. Here is the phone number to NC HOME if you want to get updates yourself. NCHAF Phone #855-696-2423”

(*See* Exhibit G, February 17, 2022 email from HTBS to Rhonda Tate, attached hereto and incorporated by reference herein.)

56. On or about April 20, 2022, Ms. Tate contacted the NCHFA directly via email to inquire about the status of her application and was informed that there was no HAF Program application on file with the NCHFA for Ms. Tate.

57. The information provided by HTBS to Ms. Tate in the email described in paragraph 55, above, was false, inaccurate and untrue. At the time that email was transmitted:

- (a) HTBS had not submitted *any* application documentation obtained from Ms. Tate to the NCHFA in support of her HAF Program application;

- (b) The NCHFA had not communicated *any* information directly to HTBS regarding Ms. Tate’s alleged application; and,
- (c) The NCHFA had not changed the program eligibility criteria requiring that an applicant be delinquent on their mortgage, property taxes, or homeowners association dues.

58. Further, the February 17, 2022 HTBS email wrongly refers to the program as “NC HOME” and incorrectly informs Ms. Tate that she will be contacted by the “NC Homeowners Association” via email. As alleged throughout this complaint, the mortgage assistance program is the “Homeowners Assistance Fund” and is being administered by the North Carolina Housing Finance Agency, rather than “NC HOPE” administered by the “NC Homeowners Association.” There is no such entity by the name of “NC Homeowners Association” registered with the North Carolina Secretary of State’s office.

59. In its advertising, HTBS represents that “[the HAF] program will fund the applications on a first come first served basis” conveying a sense of urgency in potentially interested homeowners. (*See* paragraph 18, above.) Yet despite Ms. Tate having provided her application information and payment of the \$200 fee to HTBS on or about January 15, 2022, HTBS had neither submitted Ms. Tate’s HAF application to the NCHFA, nor communicated with the NCHFA in any manner on behalf of Ms. Tate for over three months.

60. As such, the February 17, 2022 email described in paragraph 55, above, from Defendant Marvin T. Hooker to Ms. Tate reveals that HTBS had no intention to assist Ms. Tate with her HAF application in good faith or provide the services for which she paid HTBS \$200.

HTBS’s Conduct and Business Practices Regarding the HOPE Program

61. As alleged in paragraph 17, above, the HOPE Program was initially intended to provide rental and utilities assistance to tenants earning less than or equal to 50 percent of the area

median income (“AMI”), which is considered very low-income; and later, between June 15, 2021, and December 17, 2021, intake for applicants expanded to 80 percent of the AMI.

62. The AMI varies geographically across the state. However, the annual real median income in North Carolina in 2020 was \$60,266.⁵

63. In its online and social media advertising, HTBS has grossly misrepresented the income eligibility requirements associated with the HOPE Program.

64. As reflected in the screenshot below, HTBS was falsely advertising on social media webpages that tenants would be eligible for rent and utilities assistance if they made less than \$99,000 a year as a single individual, or \$198,000 a year as a couple:



⁵ U.S. Census Bureau, Real Median Household Income in North Carolina [MEHOINUSNCA672N], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MEHOINUSNCA672N>, April 11, 2022.

65. The income requirements reflected in the screenshot in paragraph 64, above, far exceed the eligibility threshold for the HOPE Program.

66. HTBS has charged tenants \$140 per application to submit a HOPE Program application to the North Carolina Office of Recovery and Resiliency (“NCORR”) on their behalf.

67. Upon information and belief, and as reflected in the attached affidavits, HTBS did not inform applicants that they could apply for HOPE Program assistance at no cost directly through the NCORR. (*See* Affidavit of Laura Hogshead, NCORR, attached hereto as Exhibit H and incorporated by reference herein.)

68. As is the case with HAF Applications, HTBS was creating unique email addresses for HOPE Program tenant-applicants to which *only* HTBS has access, and provided this false email contact information to the NCORR for HOPE Program applicants, without the tenant-applicants’ knowledge or consent.

69. In some instances HTBS’s actions in providing incorrect email address information led to the denial of the tenant’s application due to HTBS’s failure to create the email account associated with the email address prior to submitting the application, and/or because the email address information was inconsistent with an applicant’s previous application information.

70. Upon information and belief, HTBS provided such false email contact information in order to ensure that all correspondence with the NCORR regarding a tenant’s application would be conducted through HTBS, in an effort to prevent tenant-applicants from communicating directly with the NCORR about their applications.

71. Prior to submitting such applications to the NCORR for review, HTBS provided false assurances to its customers that their HOPE applications would be approved.

72. HTBS has also consistently misrepresented the status of HOPE Program applications to applicants, including misrepresentations regarding documents that had allegedly been submitted to the NCORR on the tenant's behalf in support of their HOPE Program applications.

The Melissa Moore HOPE Application

73. Tenant, Melissa Moore, submitted a HOPE Program application through HTBS on or about December 10, 2021. (*See* Affidavit of Katie Cozort, attached hereto as Exhibit I and incorporated by reference herein.)

74. Ms. Moore lives on a fixed Social Security Income, and saw a sign in HTBS's storefront window advertising the availability of rental and utility assistance. Due to her financial circumstances, she went into HTBS to inquire about the advertised assistance.

75. During the course of her interaction with HTBS, Ms. Moore was falsely told by HTBS staff that her approval for the HOPE Program assistance "was guaranteed." (*See* Exhibit J, complaint of Melissa Moore, pg. 1, attached hereto and incorporated by reference herein.)

76. No applicant is ever guaranteed approval for HOPE Program assistance, and cannot be awarded assistance unless and until a complete application has been submitted and evaluated by the NCORR. (*See* Affidavit of Linda Hogshead, NCORR, paragraph 12, attached hereto as Exhibit H and incorporated by reference herein.)

77. Based on HTBS's assurance of HOPE Program approval, Ms. Moore paid HTBS \$140 to submit her application to the NCORR.

78. Ms. Moore attempted to provide all of the information and documentation requested by HTBS in support of her HOPE Program application. Ms. Moore offered to provide a copy of her lease in support of her application, but HTBS told Ms. Moore that her lease was too

old, so HTBS would complete a “lease summary form” for her. (See Exhibit J, complaint of Melissa Moore, ppg. 2, 9, attached hereto and incorporated by reference herein.)

79. As indicated in the attached affidavit from the NCORR, only the landlord may complete and submit the lease summary form, it cannot be completed or signed by a third party. (See Affidavit of Linda Hogshead, NCORR, paragraph 13, attached hereto as Exhibit H and incorporated by reference herein.)

80. The lease summary form submitted by HTBS in connection with Ms. Moore’s application contained an incorrect email address for her landlord, Peggy Brown, and instead contained an unrelated email address provided by HTBS. (See Exhibit J, complaint of Melissa Moore, pg. 12, attached hereto and incorporated by reference herein.)

81. Upon information and belief, Ms. Moore’s lease summary form was completed and electronically signed by HTBS staff, rather than by Ms. Moore’s landlord. (See Exhibit J, complaint of Melissa Moore, pg. 2, attached hereto and incorporated by reference herein.)

82. On or about Monday, December 27, 2021, Ms. Moore received an email from Defendant Marvin T. Hooker at HTBS stating that the NCORR was still processing her application and that HTBS would call the NCORR the next day to check the status of her application. (See Exhibit J, complaint of Melissa Moore, ppg. 4-5, attached hereto and incorporated by reference herein.)

83. On or about Wednesday, December 29, 2021, Ms. Moore received an additional email from Defendant Marvin T. Hooker at HTBS stating that the NC HOPE Program ended December 17, 2021, but applications submitted by the deadline were still being processed. At that time, Ms. Moore still had received no update from HTBS as to the actual status of her HOPE

application. (*See Exhibit J, complaint of Melissa Moore, ppg. 6-7, attached hereto and incorporated by reference herein.*)

84. During the course of her dealings with HTBS, Ms. Moore provided all of the documentation requested by HTBS in support of her HOPE Program application; however, Ms. Moore was given conflicting information during the course of her interaction with HTBS regarding what documentation she needed to provide. (*See Exhibit J, complaint of Melissa Moore, ppg. 2-3, 8-9, attached hereto and incorporated by reference herein.*)

85. For example, on December 10, 2021, Ms. Moore was initially informed by Defendant Trinity Kimbro that she needed to submit a copy of her lease in support of her HOPE Program application. Ms. Moore told Defendant Kimbro that she would bring a copy of her lease back to HTBS on Monday, December 13, 2021. Soon thereafter, Ms. Moore was informed by Defendant Kimbro that she actually did *not* need to provide a copy of her lease after all. (*See Exhibit J, complaint of Melissa Moore, ppg. 2, 9, attached hereto and incorporated by reference herein.*)

86. Ms. Moore was later told via email on January 23, 2022 by Defendant Marvin T. Hooker at HTBS that she needed to provide “proof of residency” in support of her application because she never submitted a copy of her lease, and that the failure to provide such proof of residency was the reason that her HOPE Program application had not been approved. (*See Exhibit J, complaint of Melissa Moore, ppg. 8-10, attached hereto and incorporated by reference herein.*)

87. Defendant Marvin T. Hooker also informed Ms. Moore in his email of January 23, 2022 that “when you do NOT submit utility bills with your application (because you don't have them in your name), they automatically request proof of residency, because a lease can be forged[;]” however, Ms. Moore had provided HTBS with a copy of her gas utility bill several

weeks earlier. (See Exhibit J, complaint of Melissa Moore, ppg. 8-10, attached hereto and incorporated by reference herein.)

88. Despite having charged Ms. Moore \$140 to provide application “assistance,” including the submission of supporting documentation, Defendant Marvin T. Hooker further informed Ms. Moore in his email of January 23, 2022 that “if you gave us an old lease . . . then that was a problem from the jump” and that “If [NCORR] did not accept the proof of residency that you provided, then that’s on them.” (See Exhibit J, complaint of Melissa Moore, pg. 8, attached hereto and incorporated by reference herein.)

89. Because she had received conflicting information from HTBS about what information was required and what documentation had been provided by HTBS to the NCORR on her behalf; in or around late January 2022, Ms. Moore contacted the NCORR directly to inquire about the status of her application. (See Exhibit J, complaint of Melissa Moore, pg. 2, attached hereto and incorporated by reference herein.)

90. Ms. Moore was informed by a representative from the NCORR that her HOPE Program application for assistance had been denied sometime in December 2021, several weeks earlier. (See Exhibit J, complaint of Melissa Moore, pg. 2, attached hereto and incorporated by reference herein.)

91. Nonetheless, on or about January 23, 2022, presumably unaware that Ms. Moore now knew that her HOPE Program application had already been denied, Defendant Marvin T. Hooker continued to string Ms. Moore along telling her that he would contact the NCORR the next day to get an update from the NCORR regarding the status of Ms. Moore’s application. (See Exhibit J, complaint of Melissa Moore, pg. 8, attached hereto and incorporated by reference herein.)

92. Upon information and belief, neither Defendant Marvin T. Hooker nor anyone at HTBS called the NCORR on or after January 23, 2022 to discuss Ms. Moore's application.

93. Upon learning that she had been denied for HOPE Program assistance during her direct communications with NCORR, Ms. Moore requested a refund of her \$140 application fee from HTBS. (*See* Exhibit J, complaint of Melissa Moore, pg. 2, attached hereto and incorporated by reference herein.)

94. HTBS refused to refund Ms. Moore's application fee, despite HTBS's failure to provide timely or accurate information to Ms. Moore, and HTBS's failure to provide the documents that it received from Ms. Moore to the NCORR in support of her application. (*See* Exhibit J, complaint of Melissa Moore, pg. 2, attached hereto and incorporated by reference herein.)

The Cora Wharton HOPE Application

95. Tenant, Cora Wharton, contacted HTBS seeking direct contact information for the HOPE Program administrator. Ms. Wharton had submitted a prior application for HOPE Program assistance, and needed to correct some of the information provided by her landlord therein. (*See* Affidavit of Cora Wharton, attached hereto as Exhibit K and incorporated by reference herein.)

96. Rather than providing Ms. Wharton with the HOPE Program administrator's contact information that she had asked for, Defendant Trinity Kimbro at HTBS said that they could help her correct the application. Defendant Kimbro told Ms. Wharton that that they would need her most recent monthly banking statements, and told her that the fee to apply would be \$140. At that time, Ms. Wharton only had \$50, but she paid HTBS that \$50, and agreed to return to pay HTBS the remaining \$90 once her application was approved.

97. Neither Defendant Kimbro nor anyone at HTBS informed Ms. Wharton that she could apply for the HOPE Program directly with the HOPE Program administrator, the NCORR, at no cost.

98. Ms. Wharton received no updates from HTBS or the NCORR for several weeks after submitting her application through HTBS.

99. Ms. Wharton's landlord later found direct telephone contact information for the HOPE Program administrator. Ms. Wharton then called the NCORR and was told that they were not aware of HTBS, and that Ms. Wharton's HOPE application had not been approved because NCORR was awaiting a statement from her landlord regarding the incorrect information previously submitted in her initial application. Ms. Wharton then submitted the requested information from her landlord directly to the NCORR, who reiterated that they did not know anything about HTBS and had not dealt with them regarding Ms. Wharton's HOPE Program application.

100. Sometime in mid-November, Ms. Wharton's landlord informed her that the application for HOPE Program assistance must have been approved because the landlord had received a check covering three months' rent.

101. Ms. Wharton then went to HTBS to pay the remaining \$90 as she had previously agreed to do, but HTBS charged her \$140 for a "new application," which Ms. Wharton did not realize until after she had left HTBS's office.

102. Separately, Ms. Wharton learned of the December 17, 2021 HOPE Program application deadline from a friend, and submitted additional application documentation directly to the NCORR for a three month renewal of program assistance.

103. Ms. Wharton never heard anything further from HTBS about either of the applications for which she was charged by HTBS.

104. Upon information and belief, HTBS did not submit all of the documentation provided by Ms. Wharton to the NCORR. Ms. Wharton's applications were approved based on, and as a result of, her own efforts in dealing directly with the NCORR.

The Tereen Figueroa HOPE Application

105. Tenant, Tereen Figueroa, contacted HTBS on or about December 15, 2021, to inquire about the HOPE Program. She was told by HTBS that it would cost \$140 to apply and that they could not process her application without her payment of that \$140 fee. Ms. Figueroa did not have the \$140 that HTBS was charging at that time, so HTBS did not submit her application that day. (*See* Affidavit of Tereen Figueroa, attached hereto as Exhibit L and incorporated by reference herein.)

106. HTBS did not inform that Ms. Figueroa that she could apply for the HOPE Program directly through the NCORR at no cost.

107. Ms. Figueroa had to borrow the \$140 to submit her application through HTBS, and returned to HTBS on December 16, 2021, the final day before HOPE Program deadline, to submit her HOPE Program application.

108. Ms. Figueroa did not hear anything in response to her application from HTBS or the HOPE Program administrator for several weeks.

109. Given the passage of application deadline and the absence of any updates or information from HTBS, on or about January 4, 2022, Ms. Figueroa contacted the NCORR directly to discuss the status of her application; however, the NCORR could not locate her application using her email address.

110. During the course of that communication, Ms. Figueroa indicated that she submitted her application through HTBS; however, the NCORR representative informed Ms. Figueroa that it has no affiliation with HTBS, and told Ms. Figueroa that she could have submitted her application directly with the NCORR at no cost.

111. Ms. Figueroa then went to HTBS to obtain the email address that HTBS used to file her application so that she could check the status of her application. Ms. Figueroa entered the HTBS office while the NCORR representative was on her cell-phone. Defendant Trinity Kimbro of HTBS “became very nervous and agitated” about having the NCORR representative on the line and angrily told Ms. Figueroa that by calling the NCORR directly, she had “messed up” her application.

112. Ms. Figueroa never heard anything further from HTBS, and she did not get any financial assistance through the HOPE Program.

113. The HOPE Program representative with whom Ms. Figueroa was speaking told her that her application had been denied due to the inaccurate and inconsistent information submitted by HTBS in support of her application, including the incorrect email contact information.

**CAUSE OF ACTION: UNFAIR AND DECEPTIVE TRADE
PRACTICES IN VIOLATION OF N.C.G.S. § 75-1.1.**

114. The State incorporates by reference the allegations set forth in all of the above paragraphs, and re-alleges each of the foregoing paragraphs as if fully set forth herein. The State alleges further that each of Defendants’ aforesaid acts, practices, representations and omissions violate the North Carolina Unfair and Deceptive Trade Practices Act, N.C. Gen. Stat. § 75-1.1 *et seq.*

115. Plaintiff alleges that such violations are intentional and include, but are not limited to, the following:

- (a) Providing false and deceptive information about the eligibility criteria for government-backed COVID-19 pandemic financial relief programs in its advertising and direct representations to tenants and homeowners;
- (b) Knowingly charging up-front application fees to consumers who were current on their mortgage and mortgage-related obligations and thus clearly ineligible for government-backed COVID-19 pandemic mortgage financial relief under the HAF program;
- (c) Failing to disclose that the government-backed COVID-19 pandemic financial relief program administrators provide application assistance at no cost;
- (d) Creating and submitting illegitimate and false email address information on COVID-19 pandemic financial assistance applications to prevent applicants from communicating directly with program administrators;
- (e) Failing to timely submit all documentation provided by applicants to the program administrators in support of their applications;
- (f) Stringing applicants along by providing false and misleading information about the status of their financial relief applications submitted through HTBS.

116. Defendants' above described business practices have been in and affecting commerce in North Carolina.

117. Defendants' business practices are misleading, deceptive, offensive to North Carolina public policy, and substantially injurious to North Carolina consumers.

118. Pursuant to N.C. Gen. Stat. § 75-14, the State has the right to seek and obtain injunctive relief to restrain Defendants from further violations of N.C. Gen. Stat. § 75-1.1.

119. Pursuant to N.C. Gen. Stat. § 75-15.1, the State has the right to obtain the restoration of any moneys or property and the cancellation of any contract obtained by Defendants as a result of Defendants' violations of North Carolina law.

120. Pursuant to N.C. Gen. Stat. § 75-15.2, the State has the right to obtain civil penalties for Defendants' violations of North Carolina law.

121. Pursuant to N.C. Gen. Stat. § 75-16.1, the State has the right to obtain attorneys' fees and costs.

122. The State alleges that the acts, practices, representations and omissions of Defendants described herein violate the prohibition against unfair and deceptive business practices found in Section 75-1.1 of the North Carolina General Statutes, and that each individual application solicited by HTBS, and each misrepresentation made to each consumer, is a separate violation thereof. The State is therefore entitled to the statutory relief prayed for below.

**MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION UNDER N.C. GEN. STAT. § 75-14**

123. The State incorporates and re-alleges each of the foregoing paragraphs as if fully set forth herein.

124. As established by this Complaint and the exhibits and affidavits attached hereto, Defendants' above-alleged practices, misrepresentations, and omissions are ongoing and illegal. The State respectfully asks that Defendants, and anyone acting in concert with Defendants, or under their direction or control, be immediately restrained and enjoined under N.C. Gen. Stat. § 75-14 so that additional irreparable harm to the public and further violations of state law can be prevented while this action is pending.

125. The irreparable harm to the State warranting the injunctive relief sought is Defendants' ongoing violation of N.C. Gen. Stat. § 75-1.1 and continuing monetary loss and financial injury to the citizens of the State resulting from Defendants' unlawful business practices.

126. Defendants' unfair and deceptive acts and omissions as set forth herein are against public policy and are particularly damaging and exploitative because they prey on, and take advantage of, vulnerable North Carolinians, many of whom are experiencing significant financial hardship and challenging circumstances due to the COVID-19 pandemic.

127. The public will continue to suffer harm and the public interest will be adversely affected unless Defendants are enjoined from engaging in the unlawful practices set forth above, and specifically:

- (a) Charging fees to submit applications for COVID-19 pandemic relief programs, including but not limited to the HAF Program;
- (b) Soliciting business through false and deceptive advertising regarding the eligibility and requirements for any and all COVID-19 pandemic relief program(s);
- (c) Transferring, converting, encumbering, disbursing, assigning, spending, withdrawing or otherwise disposing of any funds received, directly or indirectly, from consumers in connection with any HAF or HOPE applications; and,
- (d) Destroying, removing, transferring, erasing, or otherwise disposing of any business or financial records relating to Defendants' business operations, including, but not limited to, all business and financial records relating to monies obtained from consumers in connection with Defendants' COVID-19 financial assistance application services.

128. An order which enjoins Defendants from disposing of funds unlawfully obtained from North Carolinians is necessary to maintain the status quo and to preserve assets held by Defendants as a result of Defendants' illegal activities. Without such relief, there will be irreparable damage to the Court's ability to grant effective relief in the form of monetary restitution and disgorgement of unlawful assets.

PRAYER FOR RELIEF

WHEREFORE, THE STATE RESPECTFULLY PRAYS THE COURT for the following relief:

A. That Defendants, together with their agents, employees, representatives, successors and assigns, be temporarily restrained under N.C. Gen. Stat. § 75-14, including but not limited to the acts and practices described herein above;

B. That the Court schedule a hearing within ten days to determine whether the Temporary Restraining Order, or some reasonable modification thereof, should not be continued in the form of a Preliminary Injunction pending the final adjudication of this cause;

C. That upon final adjudication of this cause, the terms of the Preliminary Injunction continue in the form of a Permanent Injunction, pursuant to N.C. Gen. Stat. § 75-14;

D. That the Court require Defendants to make restitution to their North Carolina consumers, as provided in N.C. Gen. Stat. § 75-15.1;

E. That Defendants be required to produce the following records no later than seven (7) calendar days after the entry of the Temporary Restraining Order:

1. The name and address of every bank at which Defendants maintain deposit, checking, savings, or other bank accounts, and the account number for each such account;
2. A statement of the current monetary balance in each such account held by Defendants, together with a copy of the monthly statements for each such account from October 1, 2020 through the date of entry of the Temporary Restraining Order; and,

3. A current financial statement, showing the current assets and liabilities for Defendants, and the most recent profit and loss statement submitted to the Internal Revenue Service and North Carolina Department of Revenue.

F. That the State recover civil penalties of \$5,000.00 from Defendants for each Unfair and Deceptive Trade Practice found by the Court, pursuant to N.C. Gen. Stat. § 75-15.2;

G. That all of Defendants' North Carolina contracts with consumers involving services related to financial assistance applications be cancelled and that Defendant be ordered to return all funds to purchasers of their services, pursuant to N.C. Gen. Stat. §§ 75-14 and 75-15.1;

H. That Defendant be ordered to reimburse the State for its attorney's fees and litigation expenses in this action, pursuant to N.C. Gen. Stat. § 75-16.1;

I. That the costs of this action be taxed to Defendant; and,

J. That the State be granted such other and further relief as the Court deems just and proper.

This is the 13th day of May, 2022.

JOSHUA H. STEIN
Attorney General



Keith T. Clayton
N.C. Bar No. 39583
Special Deputy Attorney General
N.C. Department of Justice
Consumer Protection Division
P.O. Box 629
Raleigh, NC 27602
Phone: (919) 716-6000
kclayton@ncdoj.gov

EXHIBIT A

**STATE OF NORTH CAROLINA
COUNTY OF WAKE**

AFFIDAVIT OF CLAUDIA YOUNG

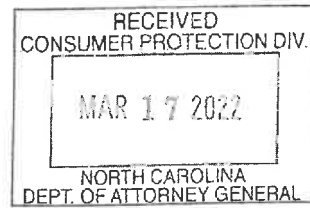
1. My name is Claudia Young. I am over eighteen years old, am competent to provide this affidavit, make this affidavit of my own free will, and state facts within my personal knowledge. If called as a witness in any hearing concerning the matters discussed in this affidavit, I can testify competently to the facts set forth herein.
2. I am the Manager of Compliance and Quality Assurance with the North Carolina Housing Finance Agency (NCHFA), and have been directly involved with the planning, implementation, and administration of the Homeowner Assistance Fund for the state of North Carolina.
3. The federal Homeowner Assistance Fund Program was created by congress through its enactment of the American Rescue Plan in response to the COVID-19 coronavirus pandemic to provide mortgage assistance to homeowners adversely impacted by the pandemic. The North Carolina Homeowner Assistance Fund is being administered by the NCHFA using \$273 million that was allocated to North Carolina under the American Rescue Plan.
4. The Homeowner Assistance Fund Program (HAF) was designed and intended to provide financial assistance with mortgage loans, property taxes, homeowners insurance, and homeowners association fees/dues to lower-income North Carolinians who have experienced a financial hardship as a result of the COVID-19 coronavirus pandemic.
5. The NCHFA began accepting applications for assistance under the HAF Program on January 17, 2022, and the application period remains open as of the date of this affidavit.

6. In order to be eligible for program funding, applicants are required to complete an on-line application which includes an attestation that they have suffered a hardship as a result of the COVID-19 coronavirus pandemic, and an attestation regarding their monthly income.
7. In support of an application, applicants are also required to provide photo identification, documentation verifying the applicant's ownership of the property, and a copy of the previous year's federal income tax return or other supporting income documentation. When the application for financial assistance pertains to delinquent property taxes or homeowners insurance, documentation applicable to those expenses is required in support of the application.
8. The NCHFA has established an online application portal where applicants can submit their applications and upload supporting documentation. The application portal, program FAQ's, participating mortgage servicers, and other program resources are available on the NCHFA's website at: <https://nchaf.gov>.
9. The NCHFA also operates a toll-free call center staffed with program specialists who serve as "case managers" for all homeowners who submit an application. These case managers are assigned to specific individual applicants to guide each applicant through the application process. Case managers are available during normal business hours to answer questions from applicants, provide information regarding the program and application process, and provide status updates regarding specific applications. The case managers' primary function is to answer any questions that an applicant may have at any point during the application and award process, and ensure that the application is complete and evaluated in a timely manner.
10. There is no charge or financial cost of any kind to apply for the HAF Program or to obtain application assistance from the NCHFA, and homeowners who need

application assistance (technical or substantive) can also obtain such support at no cost from a network of HUD-approved housing counseling agencies across the state.

11. The NCHFA has not authorized or approved any third-party to charge any fees to an applicant for providing assistance with submitting a HAF Program application.
12. Homeowners who are not delinquent on their mortgage, property taxes, homeowners insurance, or homeowners association dues are not eligible for assistance under the HAF Program in North Carolina.
13. Even where an applicant meets the preliminary eligibility criteria, approval for assistance under the HAF Program is not obligatory or guaranteed.
14. On or about January 19, 2022, NCHFA became aware that an entity known as “Hits Tax & Bookkeeping” in Burlington, NC was charging a fee of \$200 to submit applications on behalf of homeowners seeking HAF Program assistance. At that time, the NCHFA also became aware that Hits Tax & Bookkeeping was assuring applicants that they would be eligible for assistance under the HAF Program as long as they experienced a financial hardship due to the COVID-19 coronavirus pandemic. As noted in paragraph 12, above, under no circumstances would an applicant be guaranteed approval for assistance under the HAF Program before an application was processed and evaluated.
15. The NCHFA also discovered that Hits Tax & Bookkeeping was advertising the program on its website and Facebook page, and falsely indicating that applicants did not need to be delinquent in order to receive financial assistance under the program. As noted in paragraph 11, above, homeowners who are not delinquent on their mortgage, property taxes, homeowners insurance, or homeowners association fees are generally not eligible for financial assistance under the HAF Program in North Carolina.

EXHIBIT B



**STATE OF NORTH CAROLINA
COUNTY OF ALAMANCE**

AFFIDAVIT OF KORAY SAVAGE

I, **Koray Savage**, being first duly sworn, state as follows:

1. I live in North Carolina. I am over the age of eighteen and have personal knowledge of the facts set forth in this affidavit.

2. I first learned about Hits Tax & Bookkeeping from my mother, who told me that Hits Tax & Bookkeeping had information about a government mortgage assistance program. I had no prior knowledge about this government mortgage program, or about Hits Tax & Bookkeeping or the services they provide, until my mother told me about them.

3. I contacted Hits Tax & Bookkeeping to learn more about the government mortgage assistance program described by my mother. They told me that there was a new program for homeowners in need of assistance due to the COVID-19 pandemic.

4. Based on the information that Hits Tax & Bookkeeping provided, I completed the Homeowners Assistance Fund (HAF) mortgage assistance application process while in the office of Hits Tax & Bookkeeping on or about January 19, 2022.

5. I was not told by Hits Tax & Bookkeeping that I could apply for HAF assistance directly with the North Carolina Housing Finance Agency at no cost. I was charged \$200 by Hits Tax & Bookkeeping to submit the HAF application on my behalf.

6. I paid Hits Tax & Bookkeeping the \$200 fee to submit my HAF application because Hits Tax & Bookkeeping informed me that, because I had a reduction in income due to the pandemic, I met the eligibility criteria to receive financial assistance through the HAF program. What Hits Tax & Bookkeeping told me about my eligibility for the HAF program was not true.

7. When I applied for the HAF program through Hits Tax & Bookkeeping I was current on my mortgage. However, I did not have sufficient funds to pay both my mortgage and the \$200 application fee charged by Hits Tax & Bookkeeping. Based on Hits Tax & Bookkeeping's representation that I was eligible for the HAF mortgage assistance program, I did not make my next mortgage payment and fell behind after paying the \$200 fee to Hits Tax & Bookkeeping.

8. At the time I paid Hits Tax & Bookkeeping to submit the HAF application on my behalf, I was unaware that I could submit my HAF application at no cost directly through the North Carolina Housing Finance Agency. I learned that I could have applied at no cost

when the North Carolina Housing Finance Agency called me to discuss the application submitted by Hits Tax & Bookkeeping.

9. I was also informed by the North Carolina Housing Finance Agency that, because I was not delinquent on my mortgage payments or property taxes at the time my application was submitted, that I was **not** eligible for assistance through the HAF program, and that I had been misled by Hits Tax & Bookkeeping regarding the eligibility criteria for the program.

10. After speaking the North Carolina Housing Finance Agency, I contacted Hits Tax & Bookkeeping to question why they told me that I was eligible, and why they did not tell me that I could have applied for the program at no cost. They then acknowledged that the program was free, and that I could have submitted my application for mortgage assistance directly through the North Carolina Housing Finance Agency.

11. I also learned from the North Carolina Housing Finance Agency that Hits Tax & Bookkeeping provided a false email address on my HAF application. When I asked Hits Tax & Bookkeeping about the email address, they told me that they provided that address so that all of the communications regarding my application would be directed to them. I did not provide Hits Tax & Bookkeeping with consent to provide a different email address, or to conduct all correspondence with the North Carolina Housing Finance Agency on my behalf.

12. The information in this affidavit is true and correct to the best of my knowledge.

KoRay Savage 3-14-2022
KoRay Savage Date

Sworn to and subscribed before me

This the 14th day of March, 2022

Martha Marie Johnson
(Notary Public)

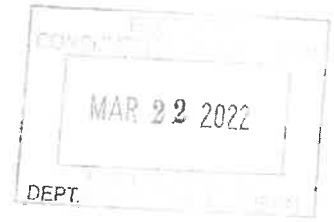
My Commission Expires: April 9th 2026

MARTHA MARIE JOHNSON
NOTARY PUBLIC
GUILFORD COUNTY, NC
Commission Expires April 9th 2026

EXHIBIT C

STATE OF NORTH CAROLINA

COUNTY OF DAVIDSON



AFFIDAVIT OF BOBBY EVERHART

I, **Bobby Everhart**, being first duly sworn, state as follows:

1. I live in North Carolina. I am over the age of eighteen and have personal knowledge of the facts set forth in this affidavit.
2. I first heard about Hits Tax & Bookkeeping by word of mouth through my granddaughter, Ms. Wendy Cranford. My granddaughter told me that she had received a text message from Hits Tax & Bookkeeping, and was made aware that there could be mortgage assistance for those in financial need.
3. I had no prior knowledge about any mortgage program, or about Hits Tax & Bookkeeping or the services they provide, until Wendy told me about them.
4. I later made an appointment with Hits Tax & Bookkeeping, and Wendy and I then drove to their office to find out more about the assistance program. They told me that there was a new program for homeowners in need of assistance due to the COVID-19 pandemic.
5. Based on the information that Hits Tax & Bookkeeping provided, I completed the Homeowners Assistance Fund (HAF) mortgage assistance application process while in the office of Hits Tax & Bookkeeping on or about February 7, 2022. I did not personally complete the online application. I gave verbal answers to the questions on the application, and Hits Tax & Bookkeeping typed my information into the application form. I was asked to provide my W-2's and general information about my mortgage.
6. I was not told by Hits Tax & Bookkeeping that I could apply for HAF assistance directly with the North Carolina Housing Finance Agency at no cost. I was charged \$200 by Hits Tax & Bookkeeping to submit the HAF application on my behalf.
7. I paid Hits Tax & Bookkeeping the \$200 fee to submit my HAF application because Hits Tax & Bookkeeping informed me that I met the eligibility criteria to receive financial assistance through the HAF program, because I had a reduction in income due to the pandemic. What Hits Tax & Bookkeeping told me about my eligibility for the HAF program was not true.
8. While Hits Tax & Bookkeeping was completing my application, I was not made aware how being current or delinquent on my mortgage could impact my application. At the time of my application, I was current on both my mortgage and my property taxes. I was assured by Hits Tax & Bookkeeping that I would still qualify for the program.

9. After approximately three weeks of waiting and hearing nothing from Hits Tax & Bookkeeping, Wendy and I called Hits Tax & Bookkeeping to check on the status of my application. I was advised by Hits Tax & Bookkeeping that the application was submitted, but due to the heavy volume of applications being received by the North Carolina Housing Finance Agency, that there was a backlog that was causing delays. What Hits Tax & Bookkeeping told me about the status of my application for the HAF program was not true.

10. After still not hearing anything from Hits Tax & Bookkeeping for quite some time, Wendy and I recently called the North Carolina Housing Finance Agency, directly. We spoke with a woman named Stephanie. She told us that only one page of a pre-application document was submitted, and that a full application package had not been received.

11. Stephanie also told me that if I was current on my mortgage and property taxes when I applied that I would not be eligible for assistance through the HAF program. This is not what I was told by Hits Tax & Bookkeeping when they charged me \$200 to submit my HAF application.

12. I also learned from the North Carolina Housing Finance Agency that Hits Tax & Bookkeeping provided a false email address on my HAF application. I did not provide Hits Tax & Bookkeeping with consent to provide a different email address, or to conduct all correspondence with the North Carolina Housing Finance Agency on my behalf.

13. As of the date of this affidavit, I have yet to receive any further updates from Hits Tax & Bookkeeping on the current status of my application.

14. I affirm that the information in this affidavit is true and correct to the best of my knowledge.

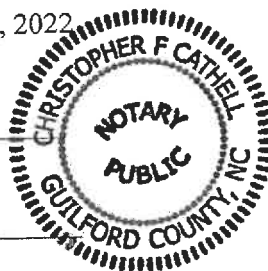
Bobby Everhart 3-17-22
Bobby Everhart Date

Sworn to and subscribed before me

This the 17 day of MARCH, 2022

Christopher F. Cathell
(Notary Public)

My Commission Expires: 9/17/2024





JOSH STEIN
ATTORNEY GENERAL

STATE OF NORTH CAROLINA
DEPARTMENT OF JUSTICE
9001 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-
9001
WWW.NCDOJ.GOV

CONSUMER PROTECTION
TOLL-FREE IN NC:
877.566.7226
OUTSIDE OF NC: 919.716.6000
FAX: 919.716.6050

March 10, 2022

Bobby Everhart
270 Misty Drive
Thomasville, NC 27360

RE: Hits Tax & Booking

Dear Mr. Everhart:

As we recently discussed, enclosed please find an affidavit regarding your dealings with Hits Tax & Bookkeeping regarding your application for the HAF mortgage assistance program.

Please review and contact me as soon as possible if you have any corrections that should be made to the document. If there are no corrections needed, please sign the affidavit in front of a Notary Public and send it back to me at your earliest possible convenience using the enclosed self-addressed envelope. If you have any questions, you may call me at (919) 716-6027.

Sincerely,

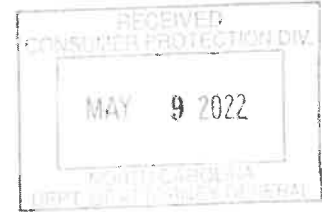
Adrienne Glover
Consumer Protection Investigator
CONSUMER PROTECTION DIVISION

Enclosure

EXHIBIT D

STATE OF NORTH CAROLINA

COUNTY OF DAVIDSON



AFFIDAVIT OF WENDY CRANFORD

I, Wendy Cranford, being first duly sworn, state as follows:

1. I live in North Carolina. I am over the age of eighteen and have personal knowledge of the facts set forth in this affidavit.
2. I own several rental properties in North Carolina. I initially heard about Hits Tax & Bookkeeping from a tenant that lived in one of my mobile home rentals.
3. My tenant told me she was working with Hits Tax & Bookkeeping to get assistance through the HOPE program to help pay her rent. My tenant told me that this program was for individuals who had been financially impacted by COVID-19. She said that Hits Tax & Bookkeeping charged her \$140 to apply for the program, and that the program funds would aid in paying her rent for a certain period of time.
4. I was aware of other tenants on my lot that could potentially benefit from the HOPE rental assistance program, so I passed along the information regarding Hits Tax and Bookkeeping and the HOPE program to some of my tenants. It is my understanding that the tenants that reached out to Hits Tax & Bookkeeping were also required to pay \$140 to apply for assistance.
5. Several months later I received an unsolicited text message from Hits Tax & Bookkeeping advising that their office was now able to submit applications for individuals who need financial assistance with mortgage loans.
6. I am unsure why I received the text message from Hits Tax & Bookkeeping. I did not request or subscribe to be on their contact list. I presume that they obtained my contact information from my tenants who sought assistance through the HOPE program, as I had referred several tenants to Hits Tax & Bookkeeping for rental assistance with that program.
7. I shared the mortgage assistance information I received from Hits Tax & Bookkeeping with my grandfather, Mr. Bobby Everhart. He was interested in the program, so we called Hits Tax & Bookkeeping and made an appointment to go to their office learn more about the program.
8. I accompanied my grandfather to Hits Tax & Bookkeeping's office to learn more about the program and complete the application process. To the best of my recollection, the date

we went to their office was January 17, 2022. Hits told us that this was a "government funded program" and that they would submit his application to the North Carolina Housing Finance Agency.

9. At the time of my grandfather's application, he was current on both his mortgage payments and property taxes. While in their office, I specifically asked Hits Tax & Bookkeeping if my grandfather would qualify for the program, and they said yes.

10. My grandfather did not personally complete my grandfather's online application. He gave verbal answers to the questions on the application, and Hits Tax & Bookkeeping typed this information into the application form. He provided Hits Tax & Bookkeeping with all the information that they asked for, including tax documents.

11. My grandfather was also asked to pay \$200 in order for Hits Tax & Bookkeeping to submit his application to the North Carolina Housing Finance Agency. Hits Tax & Bookkeeping did not inform us that my grandfather could complete and submit his application for assistance directly through the North Carolina Housing Finance Agency at no cost.

12. As my grandfather and I were preparing to leave their office, Hits Tax & Bookkeeping told us that we should hear something from them within 1-2 weeks.

13. Three weeks went by and my grandfather still hadn't heard back from Hits Tax & Bookkeeping regarding his application. On February 7, 2022 I called the North Carolina Housing Finance Agency to check on the status of my grandfather's application and I was told that my grandfather's name could not be located in their system.

14. I then called Hits Tax and Bookkeeping to inquire about my grandfather's application, and to discuss why the North Carolina Housing Finance Agency had yet to receive any information regarding his application. They told me that his application had been submitted, and they stated that things were delayed because of a backlog with the North Carolina Housing Finance Agency. Based on my contact with the North Carolina Housing Finance Agency, what Hits Tax and Bookkeeping told me about my grandfather's application was not true.

15. On February 16, 2022, I called the North Carolina Housing Finance Agency to again check on my grandfather's application. I was then advised that my grandfather's information was now in their system, and that the information wasn't forwarded until February 7, 2022, which was the same day that I contacted Hits Tax and Bookkeeping for an update on the status of the application.

16. The North Carolina Housing Finance Agency also made me aware that only one page of the application had been received. Therefore, the application status was "incomplete," and they are unable to say whether my grandfather would be approved until more information was submitted in support of his application.

17. My grandfather has yet to receive an update from Hits Tax & Bookkeeping on the current status of his application.

18. I affirm that the information in this affidavit is true and correct to the best of my knowledge.

Wendy Cranford 5-2-22
Wendy Cranford Date

Sworn to and subscribed before me

This the 3 day of May, 2022

Wt Fin
(Notary Public)

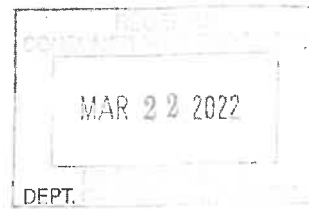
My Commission Expires: April 19, 2023

WESTON FISCHER
Notary Public
Davidson Co., North Carolina
My Commission Expires April 19, 2023

EXHIBIT E

STATE OF NORTH CAROLINA

COUNTY OF ALAMANCE



AFFIDAVIT OF WAYNE POTEAT

I, **Wayne Poteat**, being first duly sworn, state as follows:

1. I live in North Carolina. I am over the age of eighteen and have personal knowledge of the facts set forth in this affidavit.
2. I heard about Hits Tax & Booking by word of mouth through my wife and her sister, who told me that Hits Tax & Bookkeeping had information about a government mortgage assistance program. I had no prior knowledge about this government mortgage program, or about Hits Tax & Bookkeeping or the services they provide, until my relatives told me about them.
3. I then contacted Hits Tax & Bookkeeping to learn more about the government mortgage assistance program described by my relatives. Hits Tax & Bookkeeping told me that there was a new program for homeowners in need of assistance due to the COVID-19 pandemic.
4. Based on the information that Hits Tax & Bookkeeping provided, I began the Homeowners Assistance Fund (HAF) mortgage assistance application process while in the office of Hits Tax & Bookkeeping on or about February 1, 2022. I did not personally complete the online application. I gave verbal answers to the questions on the application, and Hits Tax & Bookkeeping typed my information into the application form. I was also asked to provide documents and information about my taxes and my mortgage.
5. I was not told by Hits Tax & Bookkeeping that I could apply for HAF assistance directly with the North Carolina Housing Finance Agency at no cost. I was charged \$200 by Hits Tax & Bookkeeping to submit the HAF application on my behalf.
6. At the time of my application, I was current on my mortgage payments and my property taxes. I paid Hits Tax & Bookkeeping the \$200 fee to submit my HAF application because Hits Tax & Bookkeeping informed me that, because I had a reduction in income due to the COVID-19 pandemic, I met the eligibility criteria to receive financial assistance through the HAF program. What Hits Tax & Bookkeeping told me about my eligibility for the HAF program was not true.
7. I have learned from the North Carolina Housing Finance Agency that Hits Tax & Bookkeeping provided a false email address on my HAF application. I did not provide Hits Tax & Bookkeeping with consent to provide a different email address, or to conduct all correspondence with the North Carolina Housing Finance Agency on my behalf.

8. As of the date of this affidavit, my application has been placed on hold by the North Carolina Housing Finance Agency due to the incorrect contact information provided by Hits Tax & Bookkeeping.

9. I affirm that the information in this affidavit is true and correct to the best of my knowledge.

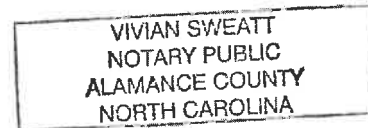
Wayne Poteat
Wayne Poteat Date

Sworn to and subscribed before me

This the 16 day of March, 2022

Vivian Sweatt
(Notary Public)

My Commission Expires: 11/11/2023





JOSH STEIN
ATTORNEY GENERAL

STATE OF NORTH CAROLINA
DEPARTMENT OF JUSTICE
9001 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-
9001
WWW.NCDOJ.GOV

CONSUMER PROTECTION
TOLL-FREE IN NC:
877.566.7226
OUTSIDE OF NC: 919.716.6000
FAX: 919.716.6050

March 10, 2022

Wayne Poteat
101 Old Stoney Mountain Rd
Burlington, NC 27217

RE: Hits Tax & Booking

Dear Mr. Poteat:

As we recently discussed, enclosed please find an affidavit regarding your dealings with Hits Tax & Bookkeeping regarding your application for the HAF mortgage assistance program.

Please review and contact me as soon as possible if you have any corrections that should be made to the document. If there are no corrections needed, please sign the affidavit in front of a Notary Public and send it back to me at your earliest possible convenience using the enclosed self-addressed envelope. If you have any questions, you may call me at (919) 716-6027.

Sincerely,

Adrienne Glover
Consumer Protection Investigator
CONSUMER PROTECTION DIVISION

Enclosure

EXHIBIT F

STATE OF NORTH CAROLINA

COUNTY OF WAKE

AFFIDAVIT OF ADRIENNE M. GLOVER

I, **Adrienne M. Glover**, being first duly sworn, state as follows:

1. I am a resident of Wake County, North Carolina, and I have personal knowledge of the facts set forth in this affidavit.

2. I am currently an Investigator with the North Carolina Office of the Attorney General in the Consumer Protection Division. I have been in this position for approximately five (5) years.

3. In my position as an Investigator, I regularly investigate, or assist in the investigation of, alleged unfair or deceptive practices of businesses and/or individuals who are suspected of operating in violation of North Carolina law.

4. I am assigned to participate in the investigation into a business engaged in soliciting and charging consumers in applying for COVID-19 financial relief programs operating under the name of Hits Tax & Bookkeeping Service, LLC (“HTBS”).

5. Part of my investigation included the review of HTBS’s various websites, including: www.hitstaxservice.com, and HTBS’s social media pages, including those set forth in the allegations in the State’ complaint.

6. Another aspect of my investigation involves handling complaints from, and speaking with consumers. On or about April 28, 2022, I spoke with Ms. Rhonda Tate. Ms. Tate described her experience with HTBS regarding an application for the HAF mortgage assistance

program, and provided me with a copy of email correspondence between herself and Todd Hooker at HTBS dated February 17, 2022. Exhibit G is a true and accurate copy of the email that I received from Ms. Tate.

7. The State's allegations in paragraphs 54 – 60 of the Complaint reflect the content and substance of my interactions with Ms. Tate.

8. I affirm that the information in this affidavit is true and correct to the best of my knowledge.

Adrienne M. Glover 5/11/22
Adrienne M. Glover Date

Sworn to and subscribed before me

This the 11th day of May, 2022

Miranda G. Winstead
(Notary Public)

My Commission Expires: 1/12/2027

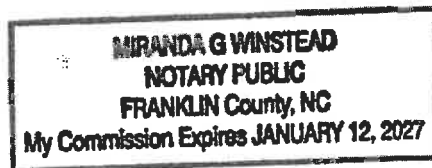


EXHIBIT G

Glover, Adrienne

From: Rhonda Tate <rhondactate@icloud.com>
Sent: Thursday, April 28, 2022 3:43 PM
To: Glover, Adrienne
Subject: Fwd: Message from HITS Tax & Bookkeeping Services waiting list

Please see below

Sent from my iPhone

Begin forwarded message:

From: HITS Tax & Bookkeeping Services <reply@thryv.com>
Date: February 17, 2022 at 5:02:38 PM EST
To: rhondactate@icloud.com
Subject: Re: Message from HITS Tax & Bookkeeping Services
Reply-To: HITS Tax & Bookkeeping Services <reply+mvbuocjpxnrh2tje@parse.thryv.com>



Dear Rhonda,

Todd Hooker replied on your conversation: Message from HITS Tax & Bookkeeping Services

Hello

Here's updated info on the NC Homeowners Association Mortgage Assistance Program. Please remember that this is a new program of about 3 weeks in. Their original estimated turnaround time was 3 weeks. They have now changed that to 8 weeks estimated turnaround. This is due to them still working out some kinks in the application and process. Such as, if you have received a phone call already from a case manager and they told you that you're not eligible if you're not behind on your mortgage, this is not in line with the program eligibility requirements and they are therefore working on implimenting an appeal process on their end so that you can still receive the mortgage assistance benefit of this program.

Additionally, they told us today that you will now be receiving an email response to your application and to give them up to 8 weeks for their response. Please check your email for NC HOME or NC Homeowners Association in case you have overlooked and if not, please keep an eye out on your email.

If you are one that have already been behind on your mortgage or in a forbearance program or bankruptcy, you probably have been moved further into the application process.

My office is staying on top of the latest updates with this program and will continue to keep you informed.

We will continue to assist you with this application process in any way we can.

Here is the phone number to NC HOME if you want to get updates yourself. NCHAF Phone #855-696-2423

Corrected by JJ 2/14/2022

Here's updated info on the NC Homeowners Association Mortgage Assistance Program. Please remember that this is a new program of about 3 weeks in. Their original estimated turnaround time was 3 weeks. They have now changed that to 8 weeks estimated turnaround. This is due to them still working out some kinks in the application and process. Such as, if you have received a phone call already from a case manager, and they told you that you're not eligible because you're not behind on your mortgage, and this is not in line with the program eligibility requirements. They are working on implementing an appeal process on their end so that you can still receive the mortgage assistance benefit of this program.

Additionally, they told us today that you will now be receiving an email response to your application and to give them up to 8 weeks for their response. Please check your email for NC HOME or NC Homeowners Association in case you have overlooked and if not, please keep an eye out on your email.

If you are one that have already been behind on your mortgage or in a forbearance program or bankruptcy, you probably have been moved further into the application process.

My office is staying on top of the latest updates with this program and will continue to keep you informed.

We will continue to assist you with this application process in any way we can.

Here is the phone number to NC HOME if you want to get updates yourself. NCHAF Phone #855-696-2423

~Todd & Erica Hooker

REPLY

[View Online](#)

Todd Hooker
HITS Tax & Bookkeeping Service
2567 S Church Street
Burlington, NC 27215
O: 336-395-3363
C: 336-675-8229
todd@hitstaxservice.com


 Powered by Thryv

EXHIBIT H

**STATE OF NORTH CAROLINA
COUNTY OF WAKE**

AFFIDAVIT OF LAURA HOGSHEAD

1. My name is Laura Hogshead. I am over eighteen years old, am competent to provide this affidavit, make this affidavit of my own free will, and state facts within my personal knowledge. If called as a witness in any hearing concerning the matters discussed in this affidavit, I can testify competently to the facts set forth herein.
2. I am the Director of the North Carolina Office of Recovery and Resiliency (NCORR), and have been directly involved with the planning, implementation, and administration of the Housing Opportunities and Prevention of Evictions Program (HOPE) for the state of North Carolina.
3. The HOPE Program was designed and intended to provide financial assistance for rental housing and essential utilities to low-income North Carolinians.
4. NCORR began accepting applications for assistance under the HOPE Program on October 15, 2020, and stopped accepting applications on December 17, 2021.
5. In order to be eligible for program funding, applicants were required to provide an attestation that they had suffered a hardship as a result of the COVID-19 coronavirus pandemic, an attestation regarding their monthly income, a copy of their lease agreement or a Lease Summary form signed by the applicant's landlord, and, if seeking assistance with utilities, a copy of the most recent monthly statement from that utility service provider. All Lease Summary forms were required to be signed by the tenant's landlord. No-one other than the landlord was permitted to sign the Lease Summary form.

6. For applications requesting rental assistance only, applicants were not required to submit utility bills in support of their applications.
7. There was no charge or financial cost of any kind in order to submit an application for HOPE Program assistance. NCORR did not authorize or approve any third-party to charge any fees to an applicant for providing assistance with submitting a HOPE Program application.
8. The application process for HOPE Program funding was designed to be a simple and straightforward process. Applicants could submit the required attestations and any supporting documentation to NCORR through an online web-portal, or via U.S. Mail. NCORR also maintained a call center staffed with case managers and other support representatives that operated during normal business hours to answer questions from applicants, provide guidance regarding the program and application process, and provide status updates regarding specific applications. Additional information, application status updates, FAQ's, and other program resources are and were also available on the internet at: www.rebuild.nc.gov/hope-program.
9. Applications were evaluated using both automation and manual review. For example, email addresses associated with applications were checked immediately upon receipt of an application via an automated email response to that address acknowledging receipt of the application. If that acknowledgement email "bounced back" as undeliverable, the application associated with that email was immediately rejected.
10. Other preliminary eligibility criteria, such as applicant income relative to the area median income, were assessed via automation.

11. Upon completion of the automated preliminary eligibility review, applications were reviewed manually and case managers initiated follow up outreach to applicants where necessary to resolve discrepancies or obtain clarification regarding application information.
12. Even where an applicant met the preliminary eligibility criteria, approval for assistance under the HOPE Program was not obligatory or guaranteed.
13. Once an application was approved for rental payment assistance, the tenant and the tenant's landlord were required to sign and submit the HOPE Landlord and Tenant Agreement form. No-one other than the tenant and the landlord was permitted to sign the HOPE Landlord and Tenant agreement unless the tenant had designated a Limited Power of Attorney using the HOPE Limited Power of Attorney form.
14. Once an application was approved, funds were disbursed directly to the landlord and/or the utility provider on behalf of the applicant. To date, funds have never disbursed directly to the applicant.
15. In addition to paying any past due delinquent rent, financial awards for forward-looking rental assistance were also disbursed in three month increments. Thus, if an approved applicant needed more than three months' worth of financial assistance going forward, in addition to any past due rental amount, the tenant would have to submit additional subsequent applications in order to receive that additional forward-looking assistance.
16. In or around September of 2021, NCORR became aware that an entity known as "Hits Tax & Bookkeeping" in Burlington, NC was charging applicants a fee of \$140 per application to submit applications on behalf of tenants seeking HOPE Program assistance, and that Hits Tax & Bookkeeping was representing to applicants that

EXHIBIT I

STATE OF NORTH CAROLINA

COUNTY OF WAKE

AFFIDAVIT OF KATIE COZORT

I, **Katie Cozort**, being first duly sworn, state as follows:

1. I am a resident of Wake County, North Carolina, and I have personal knowledge of the facts set forth in this affidavit.

2. I am currently an Investigator with the North Carolina Office of the Attorney General in the Consumer Protection Division. I have been in this position for approximately five (5) years.

3. In my position as an Investigator, I regularly investigate, or assist in the investigation of, alleged unfair or deceptive practices of businesses and/or individuals who are suspected of operating in violation of North Carolina law.

4. I am assigned to participate in the investigation into a business engaged in soliciting and charging consumers in applying for COVID-19 financial relief programs operating under the name of Hits Tax & Bookkeeping Service, LLC ("HTBS").

5. Part of my investigation included the review of HTBS's various websites, including: www.hitstaxservice.com, and HTBS's social media pages, including those set forth in the allegations in the State' complaint.

6. Another aspect of my investigation involves handling complaints from, and speaking with consumers. On or about January 26, 2022, I received a complaint against HTBS from Ms. Melissa Moore. A true and accurate copy of Ms. Moore's complaint, and the

supporting documents submitted by Ms. Moore in support of her complaint, are attached to the State's Complaint at Exhibit J.

7. The State's allegations in paragraphs 73 – 94 of the Complaint reflect the content and substance of my interactions with Ms. Moore, and her landlord, Ms. Peggy Brown.

8. I affirm that the information in this affidavit is true and correct to the best of my knowledge.

Kate Cozort 5/11/22
Katie Cozort Date

Sworn to and subscribed before me

This the 11th day of May, 2022

Miranda G. Winstead
(Notary Public)

My Commission Expires: 1/12/2027

MIRANDA G WINSTEAD
NOTARY PUBLIC
FRANKLIN County, NC
My Commission Expires JANUARY 12, 2027

EXHIBIT J

NAME

Ms. MELISSA E MOORE

MAILING ADDRESSPO BOX 4123
BURLINGTON, NC 27215**EMAIL**

MENOCH1968@HOTMAIL.COM

COUNTY OF RESIDENCE

Alamance

**DAY PHONE NUMBER
(INCLUDING AREA CODE)**

(336) 534-1026

I AM A MILITARY SERVICE MEMBER OR MILITARY SPOUSE.

No

FULL NAME OF COMPANY

HITS Tax & Bookkeeping Services, LLC

COMPANY'S INTERNET ADDRESS (URL)https://www.hitstaxservice.com/?fbclid=IwAR3vaPIQgnzTgmOxV-IEWIHiHTOrnHYOyi0wAExZY_5Ibk32BS_XzpgaVfg**ADDRESS**2567 South Church Street, Burlington, NC, United States, North Carolina
BURLINGTON, NC 27215**TELEPHONE NUMBER (INCLUDING AREA CODE)**

(336) 395-3363

COMPANY EMAIL

info@hitstaxservice.com

PRODUCT, ITEM, OR SERVICE INVOLVED

NC HOPE program

DATE OF PURCHASE, SERVICE, CONTRACT

12/10/2021

DID YOU SIGN A CONTRACT OR LEASE?

No

TOTAL AMOUNT PAID

140.00

AMOUNT IN DISPUTE

140.00

HOW WAS PAYMENT MADE?

Debit card

DID YOU BUY AN EXTENDED SERVICE CONTRACT?

No

HOW WAS INITIAL CONTACT MADE BETWEEN YOU AND THE ENTITY YOU ARE FILING THIS COMPLAINT AGAINST?

I went to the company's place of business

WHERE DID THE TRANSACTION TAKE PLACE?

Other

DETAILS

This company advertised they can get you assistance with rent, utilities assistance through the NC HOPE program. They charged you \$140.00 & guaranteed you would get your rent paid, Per Trinity the rep. Also stating that it would be

complete in 2 weeks or less & funds will go directly to my landlord. She put false information on the application, I learned that later, because I never told her my income yet she has \$950.00 on the paperwork that was sent to me by mistake. She also forged my signature & my landlord on a E-sign form. She never had our permission to do so. The only thing she asked me the day I went in the office was my name & address & \$140.00 for NC HOPE to process the application. Anyone that applied in this office had to pay \$140.00 every 3 months to extend the amount of time NC HOPE would pay rent etc. for you. I spoke with someone at The Hope program & they had knowledge of this. The rep I spoke to said you could fill out your own application on line or call a 1800 number & someone would assist you with it. THE NC HOPE program is the one that told me to contact The Attorney General office to file a complaint. This company was getting money out of people that was already down on their luck & it is very unfair to people that was in a bind already. This company need to be investigated & the lady in the NC HOPE program sent information to her supervisor because they are gaining money off a Government funded program. If they had asked for the proper income information it would have never got this far, but they didn't. she wrote in what she wanted. They refuse to give me back my \$140.00 I was never approved from the start but they carried this lie on till January the 17th & I found out the NC HOPE program closed December 17th. They have people thinking their rent is going to be paid for 18 months & they are getting \$140.00 for each person every 3 months because of that.

HAVE YOU CONTACTED THE COMPANY WITH YOUR COMPLAINT?

Yes

NAME OF PERSON MOST RECENTLY CONTACTED.

Erica Hooker

HIS/HER PHONE NUMBER (INCLUDING AREA CODE)

(336) 395-3363

RESULTS

On Sat, Jan 22, 2022 at 7:54 PM melissa enoch <menoch1968@hotmail.com> wrote:

I am just stating what I was told. I just found out the lady name, it was Trinity. She called me from a 639 number & told me I was approved & the hope program was trying to contact my landlord before they would send funds to her. I have no reason at all to lie about this. Half the info on that application is incorrect. I came in the office on December 10th, she stated I needed to bring my lease back to process the application, I said I would bring back that Monday. Then she called me & told me I didn't need it that she summited something else cause the lease was old. It would have never been a problem for me getting proof of residency because my landlord was going to bring her copy to me cause I misplaced mine. Also I would have never let her swipe my debit card for \$140.00 if she hadn't told me I would be approved.

From: HITS Tax & Bookkeeping <info@hitstaxservice.com>

Sent: Sunday, January 23, 2022 12:29:04 PM

To: melissa enoch <menoch1968@hotmail.com>

Subject: Re: Melissa Moore

Intake form attached.

On Sun, Jan 23, 2022 at 12:26 PM HITS Tax & Bookkeeping <info@hitstaxservice.com> wrote:

Good afternoon Melissa. I'm not saying you lying about anything. I own this company and I know our procedures, that if your NC HOPE Application status does not say approved, then we would not tell you it is. I just looked at it yesterday and it does not say that. In fact, it says Ineligible for Partner Review, meaning, there's something that they need to verify before moving forward. And that is common. What they needed was to verify your residency which is also common. This is required when you submit an application with just a lease. Most of the time, when you do NOT submit utility bills with your application (because you don't have them in your name), they automatically request proof of

residency, because a lease can be forged. Again, this is a normal process of NC HOPE. If they did not accept the proof of residency that you provided, then that's on them.

As I said yesterday, we'll need to get on the phone with them tomorrow to ask if they accepted that document that you provided.

And if you gave us an old lease on top of that, then that was a problem from the jump. In cases where a tenant does NOT have a lease, the HOPE Program has a general form called Lease Summary that we can use to submit your application. I've also attached our Intake Form that you signed with the information you provided to us.

Lastly, we charged a \$140 application assistance fee that is required up front. That's why you had to pay up front. And 99% of the applications we did were approved. The ones that were a problem were applications similar to yours where you didn't have a current lease nor utility bills when we submitted your application. Therefore, again, they require more verification in these cases.

A phone will need to be made to NC HOPE tomorrow to find out the current status. Mind you, you're now up against the fact that the NC HOPE Program ended on 12/17/2021. However they said they would still process applications there was in before that date. But then they put an expiration date of 01/05/2022 for those applications to sign off on approved landlord/tenant agreements. So again, that's what you are facing as you didn't provide the sufficient information at the time of the application. And some of it was the Hope Specialist not responding in a timely manner to let you know they needed further information.

WHAT RESOLUTION WOULD YOU CONSIDER FAIR?

I want my \$140.00 back because I was lied to to get it, & this company need to be investigated on the way they run this business. Especially being a tax & accounting office handling people funds. As you can see in the intake form she hand wrote the amount of income & she altered the address after I signed it & left the office.

DO YOU HAVE AN ATTORNEY IN THIS CASE?

No

HAS YOUR COMPLAINT BEEN HEARD OR IS IT SCHEDULED TO BE HEARD IN COURT?

No

WILL YOU BE SUBMITTING DOCUMENTATION BY MAIL OR FAX?:

No

FILE UPLOAD

- [Intake-Form.pdf](#)
- [Hope-Application.pdf](#)

Important Information

CONSENT

This information I have provided is true and accurate to the best of my knowledge.

Cozort, Katie

From: melissa enoch <menoch1968@hotmail.com>
Sent: Thursday, March 03, 2022 7:57 PM
To: Cozort, Katie
Subject: Fw: Message from HITS Tax & Bookkeeping Services

From: HITS Tax & Bookkeeping Services <reply@thryv.com>
Sent: Monday, December 27, 2021 4:13 PM
To: menoch1968@hotmail.com <menoch1968@hotmail.com>
Subject: Re: Message from HITS Tax & Bookkeeping Services



Dear Melissa,

Todd Hooker replied on your conversation: Message from HITS Tax & Bookkeeping Services

Good evening, NC Hope is still processing your application. We will call tomorrow to check the status again and reply to you again.
~Todd Hooker

REPLY

[View Online](#)

Todd Hooker
HITS Tax & Bookkeeping Service
2567 S Church Street
Burlington, NC 27215
O: 336-395-3363
C: 336-675-8229
todd@hitstaxservice.com

Cozort, Katie

From: melissa enoch <menoch1968@hotmail.com>
Sent: Thursday, March 03, 2022 7:59 PM
To: Cozort, Katie
Subject: Fw: Message from HITS Tax & Bookkeeping Services

From: HITS Tax & Bookkeeping Services <reply@thrv.com>
Sent: Wednesday, December 29, 2021 1:55 PM
To: menoch1968@hotmail.com <menoch1968@hotmail.com>
Subject: Re: Message from HITS Tax & Bookkeeping Services



Dear Melissa,

Todd Hooker replied on your conversation: Message from HITS Tax & Bookkeeping Services

NC Hope Program Ended 12/17/2021
However, they will still process applications that were submitted up to 12/17/2021.

Also, the Internet & Free Cell Phone Program will End on 12/31/2021. This program pays \$50 towards your internet bill each month for 18 months. This program also comes with a Free Cell Phone with the Service Provider of your choice. Contact Us ASAP to get this Amazing Benefit before it Ends on 12/31/2021.

~Todd & Erica Hooker
HITS Tax & Bookkeeping Services LLC

REPLY

[View Online](#)

Todd Hooker
HITS Tax & Bookkeeping Service
2567 S Church Street
Burlington, NC 27215
O: 336-395-3363
C: 336-675-8229
todd@hitstaxservice.com

Cozort, Katie

From: melissa enoch <menoch1968@hotmail.com>
Sent: Thursday, March 03, 2022 8:25 PM
To: Cozort, Katie
Subject: Fw: Melissa Moore

From: HITS Tax & Bookkeeping <info@hitstaxservice.com>
Sent: Sunday, January 23, 2022 12:26 PM
To: melissa enoch <menoch1968@hotmail.com>
Subject: Re: Melissa Moore

Good afternoon Melissa. I'm not saying you lying about anything. I own this company and I know our procedures, that if your NC HOPE Application status does not say approved, then we would not tell you it is. I just looked at it yesterday and it does not say that. In fact, is says Ineligible for Partner Review, meaning, there's something that they need to verify before moving forward. And that is common. What they needed was to verify your residency which is also common. This is required when you submit an application with just a lease. Most of the time, when you do NOT submit utility bills with your application (because you don't have them in your name), they automatically request proof of residency, because a lease can be forged. Again, this is a normal process of NC HOPE. If they did not accept the proof of residency that you provided, then that's on them.

As I said yesterday, we'll need to get on the phone with them tomorrow to ask if they accepted that document that you provided.

And if you gave us an old lease on top of that, then that was a problem from the jump. In cases where a tenant does NOT have a lease, the HOPE Program has a general form called Lease Summary that we can use to submit your application. I've also attached our Intake Form that you signed with the information you provided to us.

Lastly, we charged a \$140 application assistance fee that is required up front. That's why you had to pay up front. And 99% of the applications we did were approved. The ones that were a problem were applications similar to yours where you didn't have a current lease nor utility bills when we submitted your application. Therefore, again, they require more verification in these cases.

A phone will need to be made to NC HOPE tomorrow to find out the current status. Mind you, you're now up against the fact that the NC HOPE Program ended on 12/17/2021. However they said they would still process applications there was in before that date. But then they put an expiration date of 01/05/2022 for those applications to sign off on approved landlord/tenant agreements. So again, that's what you are facing as you didn't

provide the sufficient information at the time of the application. And some of it was the Hope Specialist not responding in a timely manner to let you know they needed further information.

On Sat, Jan 22, 2022 at 7:54 PM melissa enoch <menoch1968@hotmail.com> wrote:
I am just stating what I was told. I just found out the lady name, it was Trinity. She called me from a 639 number & told me I was approved & the hope program was trying to contact my landlord before they would send funds to her. I have no reason at all to lie about this. Half the info on that application is incorrect. I came in the office on December 10th, she stated I needed to bring my lease back to process the application, I said I would bring back that Monday. Then she called me & told me I didn't need it that she submitted something else cause the lease was old. It would have never been a problem for me getting proof of residency because my landlord was going to bring her copy to me cause I misplaced mine. Also I would have never let her swipe my debit card for \$140.00 if she hadn't told me I would be approved.

Get Outlook for Android

From: HITS Tax & Bookkeeping <info@hitstaxservice.com>
Sent: Saturday, January 22, 2022 7:04:07 PM
To: melissa enoch <menoch1968@hotmail.com>
Subject: Re: Melissa Moore

Here's a copy of your application. No one told you it was approved already because it has not been. So therefore, we need to call them on Monday when they open to ask the status and if they accepted that proof of residency that you provided.

On Sat, Jan 22, 2022 at 6:55 PM melissa enoch <menoch1968@hotmail.com> wrote:
I am not understanding exactly what is going on. I emailed proof of residency to the lady in the office, I have email a gas bill as well. I had a lease as proof but was told I didn't need it. I was told by the lady in the office that I was approved & they just needed to talk to my landlord. Now I am being told that I need to keep paying my rent. I am confused.

From: HITS Tax & Bookkeeping <info@hitstaxservice.com>
Sent: Saturday, January 22, 2022 6:45 PM
To: melissa enoch <menoch1968@hotmail.com>
Subject: Re: Melissa Moore

Hey Melissa,

The last thing that Hope requested for your application was that proof of residency since you didn't have any utilities in your name. That was sent to them.

They still haven't responded. We can call them on Monday to see if there is an update. But you should continue paying your rent. This application has not been approved. They needed proof of residency. We sent that to them but there's no response.

On Fri, Jan 21, 2022 at 1:23 PM melissa enoch <menoch1968@hotmail.com> wrote:

Hi Is Melissa Moore, Brenda Gwynn sister, My landlord is asking me again about the status. She is now asking me to pay the rent. I don't know what to do, please let me know if there is any change asap thank you

From: melissa enoch <menoch1968@hotmail.com>

Sent: Friday, January 14, 2022 3:24 PM

To: HITS Tax & Bookkeeping <info@hitstaxservice.com>

Subject: Melissa Moore

Get [Outlook for Android](#)

Residential/Utility Assistance

- 11 -

12/10 Submitted Hope App

INTAKE FORM

New App Or ReApply???

NEW

CLIENT NAME: Melissa Moore
 Date Received 12/10/21
 Paid? Or Need2Pay? \$140

DOCS NEEDED:

Electric Bill _____
 Water Bill _____
 Gas Bill _____
 Rental Lease Agreement \$550

Landlord Info

Landlord Name Peggy Brown
 Landlord Address 4612 Troxler Mill Road Gibsonville NC 27249
 Landlord Email Address Create
 Landlord Phone Number (336) 260-5391
 Monthly Rent Amount \$550.00

Tenant Info

Tenant Name Melissa Moore
 Tenant DOB 06/10/68
 Race _____
 Tenant Address 1810 Chandler Street Elon/ ~~Blount~~ NC 27244
 Tenant Phone Number (336) 534-1026
 Tenant Email Address menoch1968@hotmail.com
 Tenant Monthly Income \$450
 Total Months Behind 0 Months
 Tenant Disabled? _____
 UnEmployed? _____
 Tenant/Section 8? _____
 Tenant a Student? _____

Number of Household Members

Spouse Name _____
 Spouse DOB _____
 Spouse Race _____
 Spouse Monthly Income _____
 Spouse Disabled? _____
 UnEmployed? _____
 Student Section 8? _____
 Spouse a Student? _____

Household Member Name _____
 DOB _____
 Household Member Name _____
 DOB _____
 Household Member Name _____
 DOB _____
 Household Member Name _____
 DOB _____

Signature

Melissa E Moore

Date 12-10-21





Print Name

Melissa E Moore

FORM: LEASE SUMMARY

The NC Housing Opportunities and Prevention of Evictions (HOPE) Program is providing this LEASE SUMMARY form to allow applicants and their landlord to submit lease information without submitting the full written lease.

IMPORTANT: Applicants and landlords with a written lease must have available the written lease, and must submit the lease if requested by the HOPE Program. This LEASE SUMMARY form may not supersede a valid written lease. Applicants with oral leases may use this form to provide information regarding their lease arrangement, but are required to establish a written lease through the HOPE Landlord Tenant Agreement.

| LEASE SUMMARY FORM | | | | | |
|--|---|--|--|--|--|
|  | Property Information for Primary Residence ("Property") | Rental Address: | 1810 Troxler Mill Road | | |
| | | Complex name, if applicable: | | | |
| | | City: Gibsonville | State: NC | Zip: 27249 | County: Alamance |
|  | Tenant Information: Name listed in row 1 is Head of Household and shall sign on behalf of Tenant and household members. | 1. | Melissa Moore | | |
| | | 2. | | | |
| | | 3. | | | |
| | | 4. | | | |
| | | 5. | | | |
| | | 6. | | | |
| | | 7. | | | |
|  | Property Landlord/Property Manager ("Landlord"): Peggy Brown | | | | |
| | Landlord Telephone: (336) 260-5391 | | Email: PeggyBrownHomes@aol.com | | |
|  | Lease Term: Month to Month | | Current lease arrangement: | | |
| | Monthly Base Rent amount: \$ 550 | | <input checked="" type="checkbox"/> Written | | |
| | | | <input type="checkbox"/> Oral | | |
| Are the following utilities included in the lease or paid for by the Landlord? | | Sewage/Wastewater? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | Water? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | Electricity? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | Gas/Propane? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Additional monthly fees charged in Rent (such as pet fees). Describe in the blank below: | | | Late Rent Information (if applicable): | | |
| <input type="checkbox"/> _____ at \$ _____ a month <input type="checkbox"/> _____ at \$ _____ a month <input type="checkbox"/> _____ at \$ _____ a month | | | Number of months late: <u>1</u> Total amount of rent back owed: \$ <u>550</u> | | |

ATTESTATION: Landlord attests that Landlord is owner of the Property, property manager, broker, or otherwise possesses the legal standing and authority to enforce the terms of the Property lease, and that Tenant and Landlord have a valid landlord/tenant relationship, wherein Tenant does not own or have any interest in the Property. Landlord affirms under penalty of perjury that the facts set forth in these statements are true and accurate at the time of submitting this LEASE SUMMARY form. *The HOPE Program consists of federal funds provided by the U.S. Government. Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making false or fraudulent statements to any department of the United States government.*

Landlord's Signature: Peggy Brown

Date: 12 / 10 / 2021

EXHIBIT K

**STATE OF NORTH CAROLINA
COUNTY OF ALAMANCE**

AFFIDAVIT OF CORA WHARTON

1. My name is Cora Wharton. I am over eighteen years old, am competent to provide this affidavit, make this affidavit of my own free will, and state facts within my personal knowledge. If called as a witness in any hearing concerning the matters discussed in this affidavit, I can testify competently to the facts set forth herein.
2. I live at 304 Willow Brook Court, Mebane, North Carolina 27302 in the Spring Forest at Deerfield apartment complex. By September 2021 I had had two major surgeries and was concerned about falling behind on my rent.
3. The assistant manager of my apartment complex offered to help me fill out the NC HOPE Program application online. She did so on my computer, but my income was recorded incorrectly due to a typo. My application was then denied.
4. The assistant manager and I did not know how to correct the mistake on my application and could not locate a contact number for the HOPE Program, but she mentioned that she had seen a sign in the window of HITS Tax and Bookkeeping, which read: "rent and utility assistance."
5. On September 22, 2021, I went to HITS Tax and Bookkeeping located at 2567 S Church Street, Burlington, North Carolina 27302. I inquired with a female employee, Trinity, that I simply needed the number to the HOPE Program so I could fix my income information. She stated there was no need to call anyone, that HITS was in communication with HOPE, and they could fix my application for me. The way she spoke about handling my application made me believe HITS was somehow officially affiliated with the HOPE Program.

6. I had brought my denied application and related documents to HITS. Trinity stated all I needed to fix my application was my bank statements and the \$140 application fee. I stated I did not have the \$140 at that time and Trinity said a deposit would be fine and I could pay the rest of the fee later. She then swiped my card for \$50.
7. A couple days later, I returned to HITS with my bank statements. Trinity said they would file my revised application and I could pay the remaining \$90 when the application was approved.
8. Several weeks went by and I heard nothing from HITS nor HOPE about the status of my revised application, even though I was checking in with HITS every week.
9. By the end of October 2021, I became concerned because I was now behind in my rent. I shared these concerns with the assistant manager of my apartment complex and she was able to locate a phone number for the HOPE Program.
10. When I reached a representative for the HOPE Program, I asked if they had been in touch with Trinity regarding my application. The representative stated that they do not know this individual and HITS Tax and Bookkeeping does not work for the HOPE Program. In fact, my application had not yet been approved because HOPE was waiting for a written statement from the assistant manager of my apartment complex explaining the income mistake on the first application. I then sent this written statement from the assistant manager of my apartment complex to the HOPE Program. HITS had still yet to contact me regarding my revised application.
11. In mid-November 2021, the assistant manager of my apartment complex contacted me to say that my application must have been approved because they received a check from the HOPE Program for three months of back rent.
12. On December 9, 2021, I went back to HITS to pay the remaining \$90 of my application fee since it was finally approved. At this time I asked Trinity what next

steps I needed to take in order to extend my rental assistance another three months. She simply stated, "We'll take care of it," and swiped my card. I believed she was charging me the \$90 remaining of my first application fee, but I later saw she had charged me \$140, supposedly for a second application. I never asked for a second application from them nor did I approve this \$140 charge.

13. At no time did anyone employed at HITS inform me that this entire process could be handled directly with the HOPE Program at no cost, nor was I made aware of the December 17, 2021 deadline. A friend alerted me to the December 17 deadline to extend my rental assistance.

14. On December 16, 2021, I called the HOPE Program directly to inquire about extending my assistance another three months. I was told all I needed to do was provide my new lease agreement. I faxed my new lease directly to the HOPE Program and I was approved for three more months of rental assistance. I never sent my new lease to HITS. When I inquired again about HOPE's relationship with HITS, the representative told me to leave HITS alone as they have nothing to do with the HOPE Program. The HOPE representative told me that the HOPE assistance program is a government service for which there is no application fee.

15. I have not had any further contact with HITS Tax and Bookkeeping.

16. I affirm under the penalties of perjury that the foregoing representations are true and correct to the best of my knowledge.

[SIGNATURE AND NOTARY ON NEXT PAGE]

Cora Wharton 3/10/22
CORA WHARTON DATE

STATE OF North Carolina
COUNTY OF Alamance
SWORN TO AND SUBSCRIBED
BEFORE ME THIS THE 10th
DAY OF March, 2022

Josue Andre Willets
Notary Public
My commission expires:

August 28, 2024

JOSUE ANDRE WILLETS
Notary Public - North Carolina
Alamance County
My Commission Expires August 28, 2024

(Affidavit of Cora Wharton)
Page 4/4

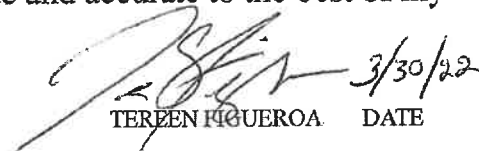
EXHIBIT L

AFFIDAVIT OF TEREEN FIGUEROA

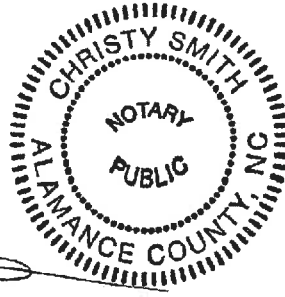
1. My name is Tereen Figueroa. I am over eighteen year old, am competent to provide this affidavit, make this affidavit of my own free will, and state facts within my personal knowledge. If called as a witness in any hearing concerning the matters discussed in this affidavit, I can testify competently to the facts set forth herein.
2. I live at 2073 Royce Drive, Mebane, North Carolina 27302, and by December 2021 I was six months behind on my rent. My landlord had been understanding to my situation, but I needed rental assistance.
3. A friend and neighbor told me about rental assistance through the NC HOPE Program, and to contact HITS Tax and Bookkeeping (“HITS”) to apply for the program. She was under the impression that HITS was working directly with the HOPE Program and the only way to apply to the program was through HITS.
4. On Wednesday, December 15, 2021, I went to HITS Tax and Bookkeeping located at 2567 S Church Street, Burlington, North Carolina 27215 to apply for the HOPE Program. I met with an employee named Trinity Kimbro who stated HITS “works with the HOPE Program,” and insinuated that their business was affiliated with the HOPE Program.
5. Trinity never stated that I could apply for the program at no cost directly through the Department of Public Safety/NC Office of Recovery and Resiliency. She informed me that the application fee was \$140 and stressed that no one has ever been denied for the program.
6. Trinity only asked for the application fee, a copy of my driver’s license, and my lease agreement to apply for the HOPE Program. I provided my driver’s license and my lease agreement, but I did not have the \$140 for the application. Trinity informed me of the December 17, 2021 HOPE deadline, but that they could not process my application until the fee was paid.
7. On Thursday, December 16, 2021, I returned to HITS to pay the \$140, which I had to borrow, in order to meet the HOPE deadline. Trinity then informed me that my application would be submitted by HITS online that day,

and I would later receive a confirmation of payment email from HITS and a confirmation email from the HOPE program.

8. By the end of Thursday I had not received an email from HITS or the HOPE program, so I emailed HITS requesting the email receipt. See email at **Attachment A**.
9. On Friday, December 17, I still had not received an email from HITS or HOPE so I went back to HITS in person to verify payment was received and the application was submitted. Trinity merely printed out a generic receipt for \$140 without any of my information on it. I requested a better receipt and waited in the office until she emailed the proper receipt and confirmation my application had been submitted. See emails at **Attachments B and C**. Trinity then stated it would take two weeks to hear back from the HOPE program.
10. On approximately January 4, 2021, I still had received no news regarding my application to the HOPE Program, so I called the HOPE program directly. The person I spoke with could not locate my application with my email. I explained that I had paid \$140 to HITS to apply on my behalf, so perhaps it was located under their email. The HOPE representative then informed me the application process is free online, the HOPE Program is not affiliated with HITS in any way, and this \$140 application fee might have been consumer fraud.
11. That same day I went to HITS to obtain the email they used to file my application so I could check the status of my application. I went to the business with the HOPE representative on the phone to ensure all information was communicated correctly. When Trinity realized I was on the phone with a HOPE representative she became very nervous and agitated and even asked me to hang up the phone. When I refused, she became very angry with me and told me that by calling the HOPE Program directly I had messed up my own application process. I left HITS and did not have any more contact with the business.
12. The HOPE Program representative informed me my rental assistance application was denied because of the inaccurate and inconsistent information submitted in support of my application by HITS.
13. I affirm under the penalties of perjury that the foregoing representations are true and accurate to the best of my knowledge.


TERREN FIGUEROA 3/30/22
DATE

STATE OF North Carolina
COUNTY OF Alamance
SWORN TO AND SUBSCRIBED
BEFORE ME THIS THE 30th
DAY OF March, 2022



Notary Public

A handwritten signature in cursive script, appearing to read "Christy Smith", written over a horizontal line.

My commission expires: 1/27/2026

ATTACHMENT A

Cozort, Katie

From: nina Baker <tereenfigueroa1476@gmail.com>
Sent: Wednesday, March 02, 2022 12:00 PM
To: Cozort, Katie
Subject: Fwd: Email receipt

Sent from my iPhone

Begin forwarded message:

From: nina Baker <tereenfigueroa1476@gmail.com>
Date: December 16, 2021 at 10:05:46 PM EST
To: info@hitstaxservice.com
Subject: Email receipt

Hi Trinity

This is Tereen Figueroa. I just wanted to check in with you because I never received the email receipt for the \$140.00 payment for the Hope Foundation application today. I just wanted to make sure the payment is recorded so the application is submitted before the deadline. Please send it to tereenfigueroa1476@gmail.com

Thanks

Tereen

Sent from my iPhone

ATTACHMENT B

Cozort, Katie

From: nina Baker <tereenfigueroa1476@gmail.com>
Sent: Wednesday, March 02, 2022 12:00 PM
To: Cozort, Katie
Subject: Fwd: Payment Confirmation

Sent from my iPhone

Begin forwarded message:

From: nina Baker <tereenfigueroa1476@gmail.com>
Date: January 6, 2022 at 8:01:39 PM EST
To: Lyn B <lynb1031@gmail.com>
Subject: Fwd: Payment Confirmation

Sent from my iPhone

Begin forwarded message:

From: HITS Tax & Bookkeeping Services <reply@thryv.com>
Date: December 17, 2021 at 10:43:24 AM EST
To: tereenfigueroa1476@gmail.com
Subject: Payment Confirmation
Reply-To: HITS Tax & Bookkeeping Services <reply+86qvF5iosbtcfp35@parse.thryv.com>



Dear Tereen,
Thank you for your payment.

Payment Received

Payment for NC Hope Reapply

Amount: \$140.00 USD

More details

Paid on: Dec 16

[VIEW RECEIPT](#)

[Send Message](#)

Power by Thyv

ATTACHMENT C

Cozort, Katie

From: nina Baker <tereenfigueroa1476@gmail.com>
Sent: Wednesday, March 02, 2022 12:00 PM
To: Cozort, Katie
Subject: Fwd: Message from HITS Tax & Bookkeeping Services

Sent from my iPhone

Begin forwarded message:

From: nina Baker <tereenfigueroa1476@gmail.com>
Date: January 6, 2022 at 8:02:11 PM EST
To: Lyn B <lynb1031@gmail.com>
Subject: Fwd: Message from HITS Tax & Bookkeeping Services

Sent from my iPhone

Begin forwarded message:

From: HITS Tax & Bookkeeping Services <reply@thryv.com>
Date: December 17, 2021 at 10:43:55 AM EST
To: tereenfigueroa1476@gmail.com
Subject: Re: Message from HITS Tax & Bookkeeping Services
Reply-To: HITS Tax & Bookkeeping Services <reply+86qvfi5iosbtcfp35@parse.thryv.com>



Dear Tereen,

Trinity Kimbro replied on your conversation: Message from HITS Tax & Bookkeeping Services

Great News! Our office has completed & submitted your NC Hope Residential/Utility Assistance Application.

Next, in about 2 weeks, your landlord will receive a landlord/tenant agreement. He will need to click on the email link to DocuSign the Agreement. The landlord will receive a second email to sign their IRS Form W-9 form which is needed to send them the check for the lumpsum approved rent.

The utility bills will be paid separately and directly to the utility companies. Please note, you are responsible to make arrangements with both your landlord and utility companies until they receive the check.

Your application fee with me is \$140. Pay by Cash App to \$HitsTaxService or Invoice.

Receive a \$10 Discount if you could take just a minute and leave us a Google & Facebook Review, it would mean the world to us.

To leave reviews, please visit our website at www.hitstaxservice.com/newpage

**Thanks again! ~Todd & Erica Hooker
HITS Tax & Bookkeeping Services LLC**

REPLY

View Online

Powered by Thryv