

From: Ryan Benson | FHFC <ryanfhfc@rjbenson.com>
Sent: Thursday, November 7, 2024 10:24 AM
To: Robinson, Heather <Heather.Robinson@eog.myflorida.com>
Cc: Miguel, Melinda M. <Melinda.M.Miguel@eog.myflorida.com>
Subject: Re:

Good Morning,

Thank you. Please allow this correspondence to confirm my receipt of the October 30, 2024, Final Closure Memorandum regarding Certain Actions by the Former Florida Housing Finance Corporation Board Chair.

Two clarifications in the document;

First, footnote 8 on page 2 of the Memorandum attributes a request to the former Board Chair, Mario Facella, for Florida Housing's Inspector General to conduct a review of two statements made in Mr. Di Napoli's resignation letter. The footnote should instead reflect that I made that request in my capacity as Florida Housing Board Chair on February 2, 2024, as reflected in the report.

The second issue for clarification is regarding a statement in the first full paragraph on page 2 of the Memorandum, which discusses FDLE-EI's referral of "relevant concerns" to the Internal Revenue Service (IRS). Based on this statement, I requested Florida Housing's Inspector General to contact the IRS to clarify the status of the FDLE referral. Accordingly, Florida Housing's Inspector General contacted the IRS investigative section to determine what action, if any, was taken regarding the referral from FDLE. The IRS advised that while they reviewed the referral, they found no specific allegations falling under Title 26 criminal statutes under the jurisdiction of the IRS Criminal Investigations. Additionally, based on the recommendations provided in the Memorandum for the board; I have directed Florida Housing staff to schedule refresher training sessions for the Board, conducted by the Florida Commission on Ethics and Kutak Rock, LLP. The Ethics Commission training will cover essential topics, including conflicts of interest, code of ethics, and statutory duties and responsibilities under s. 420.506(1), F.S.. We will have Kutak Rock will lead a session on the Boardmanship Basics Guide. These trainings will be scheduled in conjunction with the Florida Housing Board meeting events in December to strengthen our shared commitment to ethical standards and responsible governance.

I appreciate your investigation into these matters, and if there is anything else needed from me, or any other action we should take, please don't hesitate to contact me at any time.

Best,

Ryan Benson