New York City
Department of Investigation

DOI's Investigation into Arverne by the Sea Homeowners

Daniel G. Cort
Acting Commissioner

Jessica Heegan
Senior Inspector General

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Executive Summary

In October 2018, the New York City Department of Investigation (DOI) received a referral from the New York City Department of Housing Preservation & Development (HPD) alleging that a number of homeowners in Arverne by the Sea, a housing development in Rockaway, Queens designated in the early 2000's as an HPD Urban Development Action Area Project (UDAAP), were in violation of primary residence requirements by illegally renting their properties while being unjustly enriched by tax exemptions meant for owner-occupied homes. Through Arverne by the Sea and other similar homeownership projects, HPD incentivized housing development and homeownership in blighted areas by providing a 20-year property tax exemption to homeowners that required that those property owners maintain the homes as their primary residences. DOI commenced an investigation to determine whether Arverne by the Sea homeowners violated program requirements and thus improperly received tax exemptions.

DOI identified 15 homeowners who did not comply with Arverne by the Sea's primary residence requirement. Eleven of these homeowners owned multiple Arverne by the Sea properties in violation of the requirement that such homes only be used as a primary residence. Eight of the 11 homeowners used some properties as rentals, investment properties, or in one case, as a hotel registered with the City to collect an occupancy tax from guests. In addition, DOI found that another four homeowners who each owned one property used them as rentals rather than continuously occupying them.

At the same time that these homeowners violated the primary residence requirement, they also received the benefit of the program's property tax exemption. DOI calculated that the 15 homeowners who violated the primary residence requirement received a total of approximately $1.092 million in tax exemptions through Fiscal Year 2021, the last full year available.[1] DOI found evidence indicating that some of the 11 homeowners who owned multiple properties resided, at least a portion of time, in one of their properties. These homeowners received a tax exemption during such periods of primary residence at one of their

[1] DOI obtained tax bills that started in Fiscal Year 2009, the earliest that DOF had available.

properties, while not residing in their other properties and receiving exemptions for those properties. Although DOI was unable to calculate the precise amount of tax exemptions that the 15 homeowners received during periods of noncompliance with the primary residence requirement, the evidence indicates that nearly half of the exemptions related to periods when these homeowners were not in compliance.

The investigation also revealed flaws in past City oversight and interagency coordination that prevented earlier detection of the program violations. DOI found that HPD, which administers homeownership programs, did not have a system in place to identify and audit risks of program violations. HPD did not check whether Arverne by the Sea buyers previously purchased homes in the development or used their homes for purposes other than primary residence. In addition, although the New York City Department of Finance (DOF), which applies the tax exemptions, had access to tax information relevant to potential noncompliance with program requirements, HPD did not coordinate with DOF to review that information. DOF told DOI that it was unaware that the tax exemptions for Arverne by the Sea properties had a primary residence requirement. DOI's review of DOF tax information revealed several indicators of noncompliance to investigators. For example, nine homeowners received multiple Arverne by the Sea property tax bills from DOF under the same name, indicating ownership of multiple properties. In addition, DOI found that 70 of the 824 Arverne by the Sea properties had tax bills mailed to addresses outside the development, indicating possible residence elsewhere. DOI is providing HPD with this information so that the agency may take appropriate action.

Several individual cases further illustrate HPD's shortcomings in oversight of the Arverne by the Sea development. DOI referred information to HPD in 2009, and again in 2011, indicating that an owner was renting an Arverne by the Sea home, but the agency did not pursue action against the homeowner until 2017 when DOI followed up on the matter. That homeowner recently sold the property after receiving $77,000 in tax benefits. HPD paid another homeowner $176,500 in Section 8 benefits over nine years for the rental of their home to a tenant, without identifying that the homeowner was not permitted to rent the Arverne by the Sea property. In another case highlighting the lack of interagency coordination, DOF granted a certificate to collect hotel taxes to homeowners who improperly converted their Arverne by the Sea properties into a hotel, which they listed on Airbnb, Orbitz, and other booking sites.

In addition, DOI identified several deficiencies in procedures and documentation that weaken efforts at accountability, including a lack of sufficiently clear requirements and adequate enforcement mechanisms. During the course of its investigation, DOI was informed that such weaknesses present a challenge for possible criminal charges against homeowners who abused the program and its exemptions. Nevertheless, DOI has referred its findings to relevant enforcement authorities.

DOI's findings have potential implications beyond Arverne by the Sea. Many affordable housing programs that provide tax exemptions have primary residence or similar requirements. If the City does not prioritize adequate oversight safeguards in addition to development, it risks a lack of enforcement, improper receipt of tax exemptions, and the use of homes in ways not intended by the programs.

In consultation with both HPD and DOF, DOI has made 11 recommendations to expand City oversight of homeownership development program requirements and tax exemptions, to enhance interagency communication, and to strengthen program requirements and enforcement. HPD and DOF have accepted or are considering accepting these recommendations. HPD has expressed the need for additional resources to perform the expanded oversight recommended in this Report. DOI encourages the City to direct appropriate resources towards this goal.

Background

Arverne by the Sea Development, Primary Residence Requirement, and Tax Exemptions

In December 2000, HPD solicited proposals from developers to revitalize the Arverne section of the Rockaway Peninsula in Queens. In November 2001, HPD selected Benjamin Development Company, Inc. and the Beechwood Organization ("Benjamin Beechwood") to develop the site based on a proposal to build a mix of one and two-family homes along with mid-rise condominium buildings and other residences called Arverne by the Sea.

In November 2003, the New York City Council approved HPD's application requesting a UDAAP designation, which entitled Arverne by the Sea homeowners to receive a 20-year tax exemption on their homes.[2] For the first ten years of ownership, the exemption relieves the owner of the full taxable amount of the home.[3] The tax exemption then reduces annually over the final ten years, ultimately zeroing out. The tax exemption is available to subsequent buyers upon resale and is reflected on homeowners' quarterly tax statements from DOF.

In May 2005, the City and Benjamin Beechwood entered into a Land Disposition Agreement (LDA). Under the LDA, the developer was required to sell Arverne by the Sea properties only to buyers who agreed to occupy the home as their "primary residence" for 20 years, the same duration as the UDAAP tax exemption.[4] Deeds for the homes also contained the requirement, binding not only the original owner, but also any successors or assignees, to use the property as a primary residence.[5]

DOI's Investigation

In October 2018, HPD received a complaint alleging that Arverne by the Sea homeowners were being unjustly enriched by receiving tax benefits despite not using their properties as their primary residences. DOI commenced an investigation to determine whether certain Arverne by the Sea homeowners violated program requirements and improperly received tax exemptions. DOI's investigation consisted of a number of investigative actions, including coordinating with HPD to send hundreds of primary residency affidavits to Arverne by the Sea

[2] New York State law authorizes municipalities to grant UDAAP designations to development projects, which allows for the 20-year tax exemption. See 16 N.Y. Gen. Mun. L. § 696 (2021).

[3] The tax exemption does not apply to local improvements and the value of the land. *Id*.

[4] LDA § 205.A 1 ("Sponsor shall convey the Homes and Condo Units respectively . . . solely to purchasers who agree to occupy the Home or Condo Unit, or at least one of the units in the Home, as the case may be, as a primary residence for at least twenty years following the initial purchase.").

[5] Arverne by the Sea Deed ("For twenty (20) years from the date of the conveyance of the Premises to the [owner], the [owner], their successors or assigns, shall own and occupy the Premises purchased, or at least one Dwelling Unit in the Premises purchased if the Project consists of two-family homes, as their primary residence. This covenant insures that the Disposition Area to the [owner] and the construction of the Project will help increase the stock of owner occupied moderate and middle income housing in New York City.").

properties; conducting surveillance and reviewing relevant video footage; reviewing thousands of records including Arverne by the Sea program documentation, purchase agreements, deeds, enforcement mortgages, emails, and public tax bills; performing analysis of records and data including the amounts of tax exemptions; and holding numerous meetings with HPD and DOF on program components, potential remedial action, and future oversight.

Findings

1. DOI Found That 15 Homeowners Violated the Primary Residence Requirement While Collecting Tax Exemptions

a. The 15 Homeowners in Violation of the Primary Residence Requirement

DOI's investigation confirmed that 15 Arverne by the Sea homeowners violated the primary residence requirement. DOI's review of City property and tax records, as well as other investigative steps, revealed that 11 of these homeowners violated the requirement by owning multiple homes, while another four homeowners owned a single home but did not continuously occupy the property as their primary residence. The Appendix shows the Arverne by the Sea properties held by these homeowners.

The 11 homeowners with multiple homes held deeds on a total of 31 Arverne by the Sea properties.[6] DOI's investigation found that these homeowners purchased most of the additional homes on resale from private sellers who had originally purchased the properties from Benjamin Beechwood. DOI's investigation identified instances suggesting some owners sought to hide their multiple ownership by varying the spelling of their name or using a limited liability company to buy the additional properties. However, DOI also found at least 18 instances where the homeowners used the same name(s) for the purchase of additional homes as they had when purchasing their original home.

[6] In some cases of multiple ownership, homeowners may have resided in one of the homes without residing in the other properties.

b. Use of the Properties as Rentals, Investment Properties, and a Hotel

DOI determined that many of these homeowners used the properties to generate income or for investment purposes. As noted above, Exhibit A summarizes the property ownership of the 15 homeowners who violated the primary residence requirement. Eight of the 11 homeowners who owned multiple properties used some properties as rentals, investment properties, or in one case, as a hotel registered with the City to collect occupancy taxes from guests. Four additional homeowners who each owned one property used them as rentals. Several individual homeowners offer noteworthy illustrations of the misuse of the properties:

- Subject A,[7] a couple, owned two two-family homes and converted them into a hotel, advertising their beachfront "Bed and Breakfast" on Airbnb, Orbitz, and Booking.com. Rooms in the hotel were advertised with labels such as the "Caribbean Room," the "Ocean Breeze Room," and the "Rooftop Terrace Room." In total, Subject A received $40,000 in tax exemptions on their two Arverne by the Sea homes.[8]

- Subject B purchased their first property from Benjamin Beechwood in 2008 and has since acquired another six Arverne by the Sea properties from secondary sellers. Notably, Subject B purchased the last property under the name of a limited liability company. Further investigation revealed that the limited liability company was registered at the address of Subject B's original Arverne by the Sea property. In total, Subject B has received more than $175,000 in tax exemptions from seven Arverne by the Sea homes.[9]

[7] References to the homeowners as "Subject" correspond to information in the Appendix. DOI is not identifying the homeowners at this stage while possible enforcement action and remedies are under review.

[8] Calculations of Subject A's tax exemptions covered the period from Fiscal Year 2013 until Fiscal Year 2021. The properties were purchased in 2013 and 2018.

[9] Calculations of Subject B's tax exemptions covered the period from Fiscal Year 2010, the earliest records DOI was able to obtain, until February 2021. The first property was purchased in 2008 and the second property was purchased in 2015.

- Subject C, a close family member of Subject B, purchased their first property in 2014, ultimately acquiring five properties. Subject C has already received more than $115,000 in tax exemptions from five Arverne by the Sea homes.[10]

c. The 15 Homeowners' Receipt of Over $1 Million in Tax Exemptions

DOI calculated that the 15 homeowners who violated the primary residence requirement received a total of approximately $1.092 million in tax exemptions.[11] As detailed in Exhibit A, the 11 homeowners with multiple properties received approximately $901,000 in tax exemptions from the City, while the other four homeowners investigated by DOI received approximately $191,000. The exemptions on individual properties ranged from a low of approximately $10,000 to a high of approximately $77,000. Subject B, who owned seven properties, received the highest total tax exemption of $175,000 on their properties.

Homeowners with multiple properties may have resided in one of their properties and received a tax exemption during such period of primary residence, while not residing in their other properties and receiving exemptions for those properties. Based on available records, DOI was unable to identify the precise time periods when these homeowners of multiple properties may have occupied one of their homes. As a result, DOI was unable to calculate the precise portion of the total tax exemptions that was received by homeowners for periods when they did not reside in their properties. However, looking at the exemptions in the light most favorable to the property owners, the evidence indicates that nearly half of the exemptions related to periods when the 15 homeowners were not in compliance with primary residence requirements.

[10] Calculations of Subject C's tax exemptions covered the period from Fiscal Year 2015 until Fiscal Year 2021. The properties were purchased in 2014, 2015, 2016 (2 properties), and 2017.

[11] This calculation covers the period from Fiscal Year 2009, the earliest records DOI was able to obtain, through Fiscal Year 2021. Arverne by the Sea owners started purchasing properties in 2006, so some tax exemptions may not be fully captured by this calculation.

2. DOI Found That the City Lacked an Adequate System of Accountability for the Program

a. Inadequate Oversight Resulted in Failures to Detect Program Violations by Homeowners Earlier

DOI found that HPD, the agency that administers the homeownership programs, did not have a system in place to identify and audit risks of program violations. HPD did not maintain a list of initial buyers, track resale of properties, or conduct audits or other reviews of program compliance. As a result, HPD had no mechanism in place to check whether Arverne by the Sea buyers previously purchased homes in the development or used their homes for purposes other than primary residence.

Further, although DOF had access to deed and tax information relevant to monitoring program compliance, HPD did not institute a process to coordinate with DOF regarding review of such information to identify potential violations. DOF told DOI that it was unaware that the tax exemptions for Arverne by the Sea properties had a primary residence requirement. DOI's review of DOF documents revealed several indicators of noncompliance with the primary residence requirement. Specifically, the review showed that nine of the 11 homeowners with multiple properties received tax bills for multiple Arverne by the Sea properties. Further, DOI found an additional 70 of the 824 Arverne by the Sea properties had tax bills mailed to addresses outside the development, including out-of-state addresses in New Jersey, Pennsylvania, and Massachusetts, an indication that such owners may not be using the properties as their primary residence. DOI is providing HPD with this information so the agency may take appropriate action.

Several individual cases further illustrate agency shortcomings in oversight of the Arverne by the Sea development. For example:

- In 2009, and again in 2011, DOI referred information to HPD showing that Subject L was renting out their Arverne by the Sea home, but the agency did not pursue enforcement action until 2017 when DOI followed up on the matter. At that time, HPD sent

Subject L a default notice.[12] Subject L ultimately sold the property in 2020 after receiving approximately $77,000 in tax exemptions.[13] Also in 2009, DOI recommended that HPD require purchasers in the program to submit affidavits certifying their compliance with owner occupancy requirements. Although HPD ultimately implemented the recommendation for future purchasers in new housing developments, this policy change did not apply to owners in existing developments such as Arverne by the Sea.

- HPD paid $176,500 in Section 8 benefits[14] over nine years to Subject O for the rental of their home to a tenant, without identifying that Subject O was ineligible to rent the Arverne by the Sea property. DOI interviewed Subject O who acknowledged that they never lived at the property and rented the unit for the duration of their ownership. Subject O received $33,000 in tax exemptions on the property.[15]

- Subject A converted their Arverne by the Sea properties into a hotel which they listed on Airbnb, Orbitz, and other booking sites. Subject A applied to DOF for a certificate to collect hotel taxes on one of the properties, which was granted. These homeowners have obtained approximately $40,000 in tax exemptions to date on two properties.[16]

[12] HPD indicated in 2017 that its records did not contain DOI's 2009 referral. DOI's records show that it provided the referral to HPD in 2009 and again in 2011 before following up a third time in 2017.

[13] The property was purchased in 2006. Calculations of tax exemptions covered the period from Fiscal Year 2009, the earliest records DOI was able to obtain, until Subject L sold the property in 2020.

[14] HPD's Section 8 program provides rental assistance to eligible low-income households. Voucher recipients pay a reasonable share of their income towards rent and the remainder is paid directly to the landlord by HPD.

[15] The property was purchased in 2013. Calculations of tax exemptions covered the period from Fiscal Year 2015, when the UDAAP exemption first appeared on the tax bill, until Fiscal Year 2021.

[16] Calculations of tax exemptions covered the period from Fiscal Year 2013 until Fiscal Year 2021. The properties were purchased in 2013 and 2018.

b. Weaknesses in Enforcement Mechanisms and Documentation of Program Requirements Created Additional Accountability Challenges

DOI identified additional weaknesses in procedures related to program compliance, including the lack of sufficiently clear requirements in documentation and adequate enforcement mechanisms. Arverne by the Sea documents, including the LDA and the property deeds, clearly set forth the requirement that homeowners occupy the properties as their primary residence, though the term was not further defined in the documentation.[17] In addition, the documentation neither made an explicit connection between compliance with the primary residence requirement and eligibility for the tax exemption, nor did it set forth a mechanism to recoup the tax exemption for periods of noncompliance.[18] During the course of its investigation, DOI was informed that such weaknesses present a challenge for possible criminal charges against homeowners who abused the program and its exemptions. DOI has referred its findings regarding the aforementioned Arverne by the Sea homeowners to relevant enforcement authorities.

HPD's primary enforcement tool involved the possibility of foreclosure on "enforcement mortgages." Most initial Arverne by the Sea homebuyers had an enforcement mortgage, which allowed HPD to foreclose that mortgage if a homeowner failed to comply with the primary residence requirement.[19] Given the lack of oversight discussed above, HPD was not generally aware of noncompliant homeowners, unless a homeowner sought release from an enforcement mortgage.

[17] HPD informed DOI that the agency has considered employing the rent stabilization code's definition of "primary residence," but none of the documents contained that definition. See 9 NYCRR § 2520.6(u) (stating "Primary residence. Although no single factor shall be solely determinative, evidence which may be considered in determining whether a housing accommodation subject to this Code is occupied as a primary residence shall include, without limitation, such factors as listed below, (1) specification by an occupant of an address other than such housing accommodation as a place of residence on any tax return, motor vehicle registration, driver's license or other document filed with a public agency; (2) use by an occupant of an address other than such housing accommodation as a voting address; (3) occupancy of the housing accommodation for an aggregate of less than 183 days in the most recent calendar year, except for temporary periods of relocation pursuant to section 2523.5(b)(2) of this Title; and (4) subletting of the housing accommodation.").

[18] HPD has explained to DOI that such a remedy would have to be approved by the City Council in the authorizing resolution.

[19] Enforcement Mortgage § 13 ("Mortgager shall, during the term of this Mortgage, continuously occupy at least one dwelling unit on the Property as a primary residence."), § 16 (noting the mortgage "shall immediately become due and payable . . . upon any default in the covenants" of the mortgage).

HPD informed DOI that the agency inquired about compliance with the primary residence requirement in connection with such mortgage release requests. While this system provides an opportunity for HPD to withhold forgiveness of an enforcement mortgage, it cannot identify noncompliant homeowners absent a mortgage release request from the homeowner and, even in cases when such a request is made, it risks improper receipt of tax exemptions potentially for years before HPD seeks confirmation of program compliance. In cases where HPD was aware of program violations, as seen in Subject L's case above, HPD did not consistently pursue noncompliant homeowners by foreclosing the enforcement mortgage encumbering their properties. HPD informed DOI that the agency did bring such foreclosure actions, including two that were resolved in the City's favor, and continues to review complaints for the purpose of potentially bringing such actions. In any event, it appears that recoupment based on the enforcement mortgage is insufficient to make up for lost tax exemptions in cases where the amount of the exemption exceeds the mortgage.

Conclusion and Recommendations

In conclusion, DOI determined that multiple Arverne by the Sea homeowners failed to comply with the program's primary residence requirement and earned rental income on the properties while receiving tax exemptions. Furthermore, DOI identified insufficient oversight, controls, and enforcement mechanisms as shortcomings that undermine the program objectives. Without real structural reform, the City risks continued harm to its affordable homeownership programs by individuals who abuse the system and take advantage of tax exemptions.

DOI made the below recommendations to HPD and DOF to help ameliorate these issues not only in connection with Arverne by the Sea, but also with respect to other existing or future similarly situated homeownership developments and programs that require owner occupancy for participation and receipt of tax exemptions. In discussions with DOI, HPD and DOF have either accepted the recommendations or noted that they are considering acceptance. Implementation of some recommendations require coordination between the two agencies. Further, HPD has indicated that expansion of oversight will require additional staff to perform the review and audits. DOI encourages the City to provide the necessary resources for this work.

To HPD:

1. Create a list of initial home buyers in any HPD program that requires owner occupancy, track the names of secondary buyers upon resale and when initial homeowners seek to satisfy their mortgages, and review the list in an effort to prevent multiple ownership.

2. Use deed transfer reports from DOF to compare the names of individuals who purchase homes with tax exemptions to owners of homes requiring owner occupancy.

3. Use reports from DOF of properties receiving tax exemptions requiring owner occupancy, but whose tax bills are sent elsewhere, to support audits of whether such homeowners are in compliance with program requirements.

4. Pursue appropriate enforcement action, including potential tax exemption revocation and recoupment, against homeowners in HPD programs based on evidence of noncompliance with the primary residence requirement.

5. Require all homeowners in HPD programs requiring owner occupancy to submit an annual form attesting they are using the homes as their primary residence and which defines the term "primary residence" and informs the homeowner that submitting false information to the City may result in criminal charges, civil action, or administrative penalties.

6. Provide the aforementioned homeowner lists to the HPD Section 8 unit to ensure that Section 8 funds are not paid to homeowners renting their properties in violation of a primary residence requirement.

7. Include provisions defining "primary residence" in future UDAAP resolutions, LDAs, purchase agreements, and deeds.

8. Include in future UDAAP resolution applications, LDAs, purchase agreements, and deeds, provisions that condition entitlement to tax exemptions on compliance with program requirements, including primary residence and the consequences of noncompliance, including loss of tax benefits and recoupment of funds by the City.

To DOF:

9. Regularly provide HPD with a list of deed transfers for residential properties receiving tax exemptions.

10. Regularly provide to HPD with a list of homeowners receiving tax exemptions who receive their tax statements at a different address.

11. Confirm that a residential property is not receiving a tax exemption under an HPD program in connection with hotel occupancy tax applications.

Appendix: Table of Subjects[20]

#	Subject	Arverne by the Sea Section	Type	Purchase Year	Tax Exemption	Enforcement Mortgage
1	Subject A	The Dunes	2 Fam	2013	$28,232.33	
2	Subject A	The Dunes	2 Fam	2018	$12,837.95	
3	Subject B	Ocean Breeze	Condo	2008	$59,612.29	$48,500.00
4	Subject B	Palmer's Landing	2 Fam	2015	$19,287.88	
5	Subject B	Palmer's Landing	2 Fam	2016	$18,768.30	
6	Subject B	Ocean Breeze	Condo	2017	$19,428.93	$18,000.00
7	Subject B	Ocean Breeze	Condo	2017	$21,010.58	
8	Subject B	Ocean Breeze	Condo	2018	$19,663.68	
9	Subject B	Ocean Breeze	Condo	2018	$17,334.09	
10	Subject C	The Dunes	1-2 Fam	2014	$27,770.27	
11	Subject C	The Dunes	2 Fam	2015	$32,017.86	
12	Subject C	The Dunes	2 Fam	2016	$19,448.66	
13	Subject C	Palmer's Landing	2 Fam	2016	$16,761.89	
14	Subject C	Palmer's Landing	2 Fam	2017	$19,539.04	
15	Subject D	The Dunes	2 Fam	2015	$27,988.25	
16	Subject D	The Breakers	2 Fam	2016	$29,856.70	
17	Subject D	The Dunes	2 Fam	2018	$21,002.83	
18	Subject E	The Breakers	2 Fam	2008	$70,226.52	$1,000.00
19	Subject E	The Breakers	2 Fam	2017	$19,534.82	
20	Subject F	The Breakers	1-2 Fam	2009	$46,677.40	$1,000.00
21	Subject F	The Breakers	2 Fam	2015	$27,085.06	
22	Subject G	Palmer's Landing	2 Fam	2006	$49,620.48	$1,000.00
23	Subject G	Palmer's Landing	1-2 Fam	2017	$15,347.19	
24	Subject H	Ocean Breeze	Condo	2006	$57,252.40	$36,000.00
25	Subject H	The Sands	2 Fam	2014	$11,937.01	
26	Subject I	The Sands	2 Fam	2007	$62,545.23	$1,000.00
27	Subject I	The Sands	2 Fam	2016	$19,761.71	
28	Subject J	Ocean Breeze	Condo	2017	$22,995.34	
29	Subject J	Ocean Breeze	Condo	2016	$14,294.05	
30	Subject K	The Breakers	2 Fam	2009	$48,972.27	$1,000.00
31	Subject K	Palmer's Landing	2 Fam	2014	$24,251.20	
32	Subject L	Ocean Breeze	Condo	2006	$77,355.97	$36,000.00
33	Subject M	Ocean Breeze	Condo	2018	$13,493.77	
34	Subject N	Ocean Breeze	Condo	2006	$67,193.78	$36,000.00
35	Subject O	The Dunes	2 Fam	2013	$32,783.67	
	Total				**$1,091,889.40**	**$179,500.00**

[20] The Table shows the properties owned by the 15 subject homeowners (A – O) who received tax exemptions while violating the primary residence requirement. For each property, it identifies the location within Arverne by the Sea; housing type; date of purchase; tax benefits that the homeowners received up to Fiscal Year 2021, the last full year available; and amount of the HPD enforcement mortgage, if any. Given the primary residence requirement, an owner can lawfully claim the full exemption on one owner-occupied property, but not on additional properties.