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The Low-Rent Housing Project On Quebec Road In Cincinnati

B-173350

Department of Housing and
Urban Development

*BY THE COMPTROLLER GENERAL
OF THE UNITED STATES*

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JULY 25, 1972



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-173350

Dear Mr. Clancy:

This is our report on the low-rent housing project on Quebec Road, Cincinnati, Ohio. Our review was made pursuant to your request of November 30, 1971.

We plan no further distribution of this report unless copies are specifically requested, and then we shall make distribution only after your agreement has been obtained or public announcement has been made by you concerning the report.

The Department of Housing and Urban Development and the Cincinnati Metropolitan Housing Authority have not been given an opportunity to examine and comment on the report. This fact should be considered in any use made of the information presented.

Sincerely yours,

A handwritten signature in cursive script that reads "James B. Stacks".

Comptroller General
of the United States

The Honorable Donald D. Clancy
House of Representatives

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ABBREVIATIONS

CMHA Cincinnati Metropolitan Housing Authority
GAO General Accounting Office
HUD Department of Housing and Urban Development
LHA Local Housing Authority

D I G E S T

WHY THE INQUIRY WAS MADE

At the request of Congressman Clancy, the General Accounting Office (GAO) inquired into aspects of the Quebec Road segment of a low-rent housing project. This project is being developed under the turnkey method for the Cincinnati Metropolitan Housing Authority (CMHA). The Department of Housing and Urban Development (HUD) is providing financial assistance.

GAO reviewed acquisition of the site, cost of site improvements and structures, HUD policies on public hearings, and possible associations among turnkey developers in Ohio, Kentucky, and Michigan.

FINDINGS AND CONCLUSIONS

Site acquisition

In June 1971 HUD authorized payment of \$54,000 for the Quebec Road site. The approved price for the site was supported by two independent appraisals. GAO found that the appraisals generally met HUD requirements. (See p. 8.)

The site was assembled in 1967 and 1968 from smaller parcels of land. Because it was purchased on a parcel-by-parcel basis and because most of the parcels were bought at an auction held to pay delinquent taxes, the price paid for the site by the assembler (\$18,930) was not considered by the appraisers or HUD to be an indication of the site's value. (See p. 8.)

The person who assembled the site held no recorded interest, for the past 19 years, in any of 30 sites considered or selected by CMHA for seven other public housing projects. (See p. 7.)

HUD procedures set forth steps and sequences to be followed for finalizing the design and for negotiating the price of land and improvements for turnkey projects. CMHA did not follow the sequence for the Quebec Road project because HUD regional officials

- considered the procedures only a guide,
- wanted to expedite the project, and
- considered it impractical to always follow the procedures.

The failure to strictly follow the procedures had no apparent adverse effect on the cost or processing of the project. (See p. 10.)

Cost of site improvements and structures

Seven firms submitted proposals, and CMHA's board of directors selected Republic Development Corporation as the developer.

Two Cincinnati firms submitted proposals. One was unacceptable in the areas of construction and design, and the other proposed a price higher than that of the selected developer. (See p. 11.) Most of the actual construction work on the Quebec Road site will be subcontracted to firms in the Cincinnati area. (See p. 12.)

GAO was unable to determine the site preparation cost because HUD and CMHA did not require detailed cost estimates to be submitted with proposals. (See p. 12.) The developer's proposed \$150,000 for site improvements includes items not directly related to preparing the site for construction.

The cost for each of the 48 dwelling units for the Quebec Road site, as contained in the contract of sale, is \$22,917. CMHA and HUD are considering reducing the number of units to 42. The developer's proposed cost for the 42 units is \$26,041 per unit. (See p. 13.)

The United States Housing Act of 1937, as amended, established certain criteria relating to the cost of public housing. The costs of the Quebec Road project met these criteria. (See p. 13.)

HUD policy on public hearings

HUD does not require public hearings on low-rent housing projects; however, for turnkey projects HUD requires after-the-fact disclosure when the developer is selected and when the contract of sale is awarded. Although CMHA did not publish a public advertisement on the award of the contract for this project, there were a series of meetings with interested groups prior to the award and several newspaper articles were published. (See p. 14.)

Ohio State law requires local housing authorities to seek the advice of local planning commissions on the location, extent, and general features of a project layout. The Cincinnati Planning Commission and CMHA disagreed as to whether the requirements of the law were met with regard to the Quebec Road project. In April 1971 CMHA and the commission established procedures for submitting future projects for the advice of the commission. (See p. 15.)

Possible associations among turnkey developers

GAO's review of possible associations among firms engaged in turnkey development of public housing covered 107 projects in Ohio, Kentucky, and Michigan. The projects were developed by 55 firms, 11 of which developed three or more projects.

From the statements of disclosure of interest, GAO identified 260 individuals as officers, directors, or major owners of the 55 firms; 39 individuals were associated with more than one firm, but no individuals were involved with more than two firms. (See p. 17.)

The Republic Development Corporation (developers for the Quebec Road project) and its wholly owned subsidiary, the CFH Development Corporation, developed two turnkey projects. Officers, directors, or owners of Republic and CFH were not shown in the statements as officers, directors, or owners of the other turnkey developers. (See p. 17.)

CHAPTER 1

INTRODUCTION

The Housing Act of 1937, as amended (42 U.S.C. 1401), authorizes the Department of Housing and Urban Development (HUD) to conduct a program of housing assistance under which local governments establish independent legal entities--known as local housing authorities (LHAs)--to develop, own, and operate low-rent public housing projects.

At the request of Congressman Donald D. Clancy, we inquired into certain aspects of the Quebec Road segment of a low-rent housing project being developed under the turnkey procedures for the Cincinnati Metropolitan Housing Authority (CMHA). Our review covered

- acquisition of the site,
- cost of site improvements and structures,
- HUD policies on public hearings, and
- possible associations among turnkey developers in Ohio, Kentucky, and Michigan.

Under the turnkey procedures, LHAs contract with private developers or builders to buy, upon completion, housing they will have built. Any member of the private building industry with an available site or an option to buy may, in response to an LHA invitation for proposals, approach an LHA with a proposal to build housing in accordance with his own plans and specifications. If the offer is attractively priced and meets acceptable design standards, the LHA may enter into a contract to purchase the property upon its satisfactory completion.

In October 1968 CMHA and the city of Cincinnati entered into a cooperation agreement--a binding contract between an LHA and the governing body of the locality in which housing is to be located providing for local cooperation in the development and management of low-rent public housing--calling for construction of 1,000 units of low-rent public

housing. In February 1969 HUD established a program reservation for these 1,000 units. To use part of this reservation CMHA in March 1970, advertised for proposals for 250 family dwelling units to be constructed under the turnkey procedures.

In May 1970 CMHA tentatively selected the Republic Development Corporation to develop 100 units of family housing on two separate sites. The proposed project design included 50 units on Clinton Springs Avenue and 50 units on Quebec Road.

The Quebec Road design called for construction of 27 structures on an 11.78-acre tract. The design was subsequently altered to convert one duplex structure to a community building, which reduced the planned units for the site to 48. In response to continued community pressure, the design was further modified and the latest proposal, made in March 1972, was for the construction of 28 structures containing 42 dwelling units. Under this design all structures fronting on Quebec Road will be single-family units. (See apps. I and II for the initial and latest site plans.)

SCOPE OF REVIEW

The information contained in this report was obtained from (1) a review of records at CMHA and at HUD's area office in Columbus, Ohio, (2) discussions with HUD and CMHA representatives and other individuals associated with the project, (3) a visit to the project site, and (4) an examination of property transfer records of Hamilton County, Ohio.

CHAPTER 2

SITE ACQUISITION

ACQUISITION AND SALE OF SITE BY PRIOR OWNER

The Quebec Road site was assembled in 1967 and 1968 through purchases at an auction held to pay delinquent taxes and through private transactions. The assembler purchased 25 of the site's 35 parcels in July 1967 at an auction for prices ranging from \$5 to \$2,200 a parcel and totaling \$8,530. He purchased five parcels in September 1967 for a recorded price of \$9,300 and the remaining five parcels in June 1968 for a recorded price of \$1,100, which made his total cost \$18,930. The site was originally listed for sale in November 1969, about 4 months before CMHA advertised for proposals.

Hamilton County tax records showed that the CFH Development Corporation had bought \$53,000 worth of tax stamps in July 1970 for the site. An employee of the county auditor's transfer department informed us that this does not mean that CFH paid \$53,000 for the land because it is possible to buy more tax stamps than required for any sale. Therefore we were unable to determine the actual price paid for the site by the developer.

The site has about 780 feet of frontage along Quebec Road. The assembler purchased about 630 feet of frontage at the tax auction and 150 feet through private transactions. Six of the 10 parcels purchased in private transactions were abutted on at least three sides by the land previously purchased at the tax auction. Appendix III shows the kind of purchase and the price paid by the assembler on a parcel-by-parcel basis.

SITE ASSEMBLER'S INTEREST IN OTHER CMHA SITES

We examined the Hamilton County auditor's property transfer records for 30 sites on seven CMHA projects. Our review covered ownership for these sites from 1953 to February 1972. We found no indication that the assembler of the Quebec Road site held an interest in any of the 30 sites acquired or considered by CMHA for low-income housing.

AMOUNT AUTHORIZED TO BE PAID FOR SITE

The developer proposed \$100,000 as the total price of the project site. This consisted of \$53,000 for the Quebec Road site, \$45,000 for the Clinton Springs Avenue site, and \$1,000 for title and legal fees for each site. The contract of sale, executed in June 1971 by the developer and CMHA and approved by HUD, incorporated the developer's total proposed price and thereby established the prices as those authorized by the Federal Government.

The approved price for the land for the Quebec Road site was supported by independent appraisals made under contracts with CMHA. The appraisers formulated their opinions of the value of the site through comparison with other sales of hillside land suitable for multifamily development. The two appraisal reports showed that a total of 11 properties had been analyzed, six of which were located within about 2 miles of the site. One appraiser valued the site at \$55,000, and the other valued it at \$50,800.

Neither appraiser considered the amounts paid by the individual who assembled the site and who sold it to the developer as indications of its value because the site had been purchased on a parcel-by-parcel basis rather than as a complete unit and because most of the Quebec Road frontage had been purchased at an auction held to pay delinquent taxes. HUD land valuation officials advised us that they did not believe the assembler's cost was indicative of the fair market value of the site for these same reasons.

HUD reviewed the two appraisals and found them acceptable as to form and content. As a result of a congressional request, HUD later conducted a field review of the appraisals, including an analysis of the approaches used by the appraisers, and concluded that the \$53,000 paid by the developer did not exceed the fair market value of the site. Our review of the appraisals showed that they were prepared in a format which generally met HUD's requirements.

At our request HUD property valuation officials analyzed the price paid for the land. Their analysis, made on a cost-per-dwelling-unit basis and a cost-per-front-foot basis, concluded that the price paid appeared reasonable.

In addition, a HUD cost estimator expressed the opinion that the total cost of the land and site improvements, slightly more than \$4,000 per dwelling unit, was within a reasonable range for single-family and duplex housing in the Cincinnati area.

According to Hamilton County tax records, the assessed value of the site for tax purposes was \$15,690. An official of the county auditor's office told us that this reflected a valuation based on appraisals made some time between 1965 and 1968. In Hamilton County the assessed value of property is less than the appraised value. Using a formula provided by the auditor's office, we estimated the appraised fair market value of the land at the time of the last appraisal to be about \$38,650.

COMPLIANCE WITH HUD PROCEDURES AND REGULATIONS

HUD procedures set forth processing steps and sequences to be followed for turnkey projects. These procedures provide (1) for finalizing the project design and (2) for HUD and the LHA to negotiate prices separately for land and improvements, including structures, with the developer. The negotiated prices are to be used in the development program on which the annual contributions contract--a contract between HUD and the LHA which sets forth specific obligations and mutual responsibilities for the development, operation, and fiscal aspects of low-rent housing projects--is based and as a ceiling for the contract of sale.

A HUD headquarters official told us that HUD's turnkey manual stipulated mandatory processing steps and a mandatory sequence for these steps. In processing the Quebec Road project, CMHA did not follow the processing sequence set forth in the turnkey procedures. For example, the development program, which is supposed to include prices based on negotiations with the developer, was submitted to HUD and was approved in June 1970, prior to CMHA's negotiations with the developer.

HUD regional officials responsible for processing the project offered the following reasons for not following the processing sequence.

- The turnkey handbook was considered a guide and did not require strict adherence to the procedures.
- The officials wanted to get the project under an annual contributions contract before the close of the fiscal year.
- It is not always practical to strictly follow the processing procedures.

In our opinion, the failure to strictly follow the HUD turnkey manual had no apparent effect on the cost or processing of the project.

CHAPTER 3

COST OF SITE IMPROVEMENTS AND STRUCTURES

Our examination into the cost of site improvements and structures included a review of the analysis prepared by CMHA and its consultant concerning the selection of a developer for the project. We also examined (1) the amount of site preparation cost prior to construction and (2) the total cost for dwelling units, including compliance with Federal acts and HUD regulations relative to cost limitations.

SELECTION OF DEVELOPER

In response to newspaper advertisements for proposals, CMHA received initial requests for proposal packages from 27 developers, of which eight had Cincinnati addresses. Seven developers submitted detailed proposals to CMHA in April 1970. Each proposal was analyzed by CMHA and its consultant, Ross-Hostetler & Associates, Inc., primarily on the basis of (1) completeness of the proposal, (2) suitability of the site(s), (3) acceptability of design and construction, and (4) reasonableness of prices. In part, the analysis consisted of the following information.

CMHA Evaluation of Proposals and Selection of Developer

Name of developer (in order of lowest cost)	Number of dwelling units	Total proposed price	Proposed cost per dwelling unit	Acceptability					
				Site		Con- struction		Design	
				Yes	No	Yes	No	Yes	No
Housing Development Company	106	\$2,094,000	\$19,755	X			X		X
D&D Development Company	50	993,000	19,860		X	X			X
D&D Development Company	20	413,600	20,680		X	X			X
American Modular	34	726,214	21,359	X		X			X
Republic Development Corporation (combined)	150	3,283,800	21,892	X		X		X	
Republic Development Corporation (site 1) (note a)	50	1,081,600	21,632	X		X		X	
Republic Development Corporation (site 2)	50	1,099,800	21,996	X		X		X	
Lippman Associates	200	4,440,000	22,200		X	X			X
Republic Development Corporation (site 3) (note a)	50	1,117,400	22,348	X		X		X	
Towne Properties (note b)	50	1,124,500	22,490	X			X		X
Jaxon Construction Company (note b)	49	1,127,000	23,000	X		X		X	
Jaxon Construction Company (alternative) (note b)	49	1,170,904	23,896	(c)		(c)		(c)	

^aProposals selected.

^bCincinnati firms.

^cThe evaluation chart prepared by CMHA did not show the acceptability of the site, construction, and design for Jaxon's alternative proposal. Other evaluation documents in CMHA's files indicated, however, that this proposal was for the same site but was unacceptable in construction and design.

Of the developers listed, the Jaxon Construction and Towne Properties are Cincinnati-based firms. On May 26, 1970, Mr. George Ross of Ross-Hostetler & Associates, Inc., and CMHA staff members presented their evaluation of proposals to the CMHA board of directors, which selected Republic Development Corporation as the developer.

Most of the actual construction work on the Quebec Road site will be subcontracted to firms operating in the Cincinnati area. Of the 19 subcontractors identified to us by the developer as of February 1972, 15 were Cincinnati area firms.

COST OF SITE PREPARATION

The developer proposed \$150,000 for site improvements for the Quebec Road site. This amount included the actual preparation of the site for construction, installation of underground utilities, paving of parking areas, landscaping, construction of patios and sidewalks, and subcontractors' overhead and profit. Since HUD and CMHA do not require detailed cost breakouts with proposals, we were not able to determine the amount attributable specifically to the preparation of the site for construction.

Although the Quebec Road site is located on a hillside, the independent cost estimates for the project (required by turnkey procedures) did not include any cost for correction of unusual site conditions. The two appraisers compared the site with other hillside developments in the same general area of the city. One appraiser found the terrain of the site inferior to that of three of the developments, equal to one, and superior to two. The other appraiser considered the value of the site to be at the bottom of the indicated price range of other sales analyzed because of zoning, location, and topography.

DWELLING-UNIT COSTS

The Quebec Road and Clinton Springs Avenue sites are a single project, and development cost information is not broken down on a site basis. The contract of sale divides the project into three phases for the purpose of payment to the developer and transfer of completed units to CMHA.

Using this information we were able to assign a portion of the developer's price to the Quebec Road site. The following schedule shows the dwelling-unit cost for the entire project and for the Quebec Road site at each of the levels of proposed project development.

<u>Number of units</u>	<u>Cost</u>	<u>Dwelling-unit cost</u>
Complete project:		
100	\$2,194,000	\$21,940
96	2,194,000	22,854
82	2,139,938	26,097
Quebec Road site:		
50	1,100,000	22,000
48	1,100,000	22,917
42	1,093,713	26,041

The United States Housing Act of 1937, as amended, established certain criteria for the cost of public housing. In their review HUD officials concluded that this project met the requirements of the act, and we verified this.

CHAPTER 4

HUD POLICY ON PUBLIC HEARINGS

HUD does not require public hearings to be held on low-rent housing projects; however, under the turnkey method, HUD requires that the LHA make available to the public after-the-fact information on the selection of a developer and the issuance of a contract of sale.

HUD's turnkey handbook requires the LHA to prepare a statement setting forth the factors which contributed to the selection of the developer and to hold this statement available for public inspection. When a contract of sale is entered into, the LHA is required to notify the general public by newspaper advertisement of the award of the contract, the name of the developer, the contract price, and a description of the project.

The director of CMHA told us that the documentation submitted to HUD to justify the LHA's selection of a developer served as the statement pertaining to selection. CMHA did not purchase a newspaper advertisement to notify the general public of the award of the contract of sale. On this project, however, a series of meetings were held with interested groups prior to the award of the contract of sale and numerous newspaper articles were published.

HUD officials told us that State laws or local jurisdictions may require public hearings on low-rent housing projects. Ohio State law does not require public hearings; however, it does require coordination between the LHA and the local planning commission. Section 3735.44 of the Ohio Revised Code states, in part, that:

"Before any housing project of an authority is determined upon by the authority or any real estate is acquired or any agreement for its acquisition is made, the location, extent, and general features of the proposed layout shall be submitted to the planning commission of the municipal corporation or other political subdivision in which the proposed project is located, for the advice of such planning commission upon the proposed location, extent, and general features of the layout."

This provision of Ohio law was brought to the attention of the Cincinnati Planning Commission through the inquiries of a member of the commission, who questioned how CMHA complied with State law in the selection of project sites. CMHA adopted the position that it complied with the law through a meeting held between the developer and the staff of the director of city planning.

We discussed this matter with the director of city planning who explained that the meeting referred to was a conference between his technical staff and the developer's representatives for the purpose of reviewing the technical aspects of the developer's plans and drawings. The director added that, in his opinion, this conference did not constitute compliance with the Ohio law. The director stated, however, that, at the time of the controversy, the planning commission was not knowledgeable of its responsibility so the matter was not pursued.

As a result of the above inquiry, the Cincinnati Planning Commission formulated policy guidelines for the location of future low-income housing. These guidelines include criteria concerning the location of projects in the city and the extent of development of selected sites. These guidelines were discussed at a meeting of the CMHA board of directors on December 15, 1970, at which the board directed that every effort be made to continue to cooperate with the commission in housing to be developed by CMHA.

On April 2, 1971, the commission entered into an agreement with CMHA concerning guidelines for submission of projects to the commission for advice. These guidelines call for review by the commission after tentative selection of a developer by CMHA.

CHAPTER 5

POSSIBLE ASSOCIATIONS AMONG TURNKEY DEVELOPERS

We inquired into the possible association of the officers, directors, and major owners of firms developing public housing projects by the turnkey method in Ohio, Kentucky, and Michigan. Our inquiry included a comparison of the names of firms and their owners, directors, and officers that developed turnkey projects financed under annual contributions contracts executed between July 1968 and December 1971.

The following table shows the number of projects identified in each State and the number of projects for which we obtained the statements of disclosure of interests--a statement containing the names of the developer's officers and principal members, shareholders, and investors and other parties having a substantial share or ownership interest in the developer--which are required by turnkey procedures.

Turnkey Projects July 1968 Through December 1971

	<u>Ohio</u>	<u>Kentucky</u>	<u>Michigan</u>
Number of projects	88	7	50
Statements of disclosure of interest received	78	7	22

The number of statements reviewed is less than the number of projects because some annual contributions contracts were executed before the requirement for statements was initiated (December 1968) or because the LHAs had not submitted statements by the time our fieldwork was completed.

A total of 55 firms developed the projects for which we obtained statements. Of this number, 11 firms developed three or more projects. Three firms developed projects in more than one of the three States under the same firm title. They were the Housing Development Company of Cleveland, Ohio, which developed 10 projects in Ohio and one in Michigan; the Building Systems Housing Corporation of Cleveland,

which developed two projects each in Ohio and Michigan; and the Housing Associates of Columbus, Ohio, which developed three projects in Ohio and one in Michigan.

Appendix IV lists all firms for which we obtained statements of disclosure of interest and includes the number of projects developed by the firms in each of the three States.

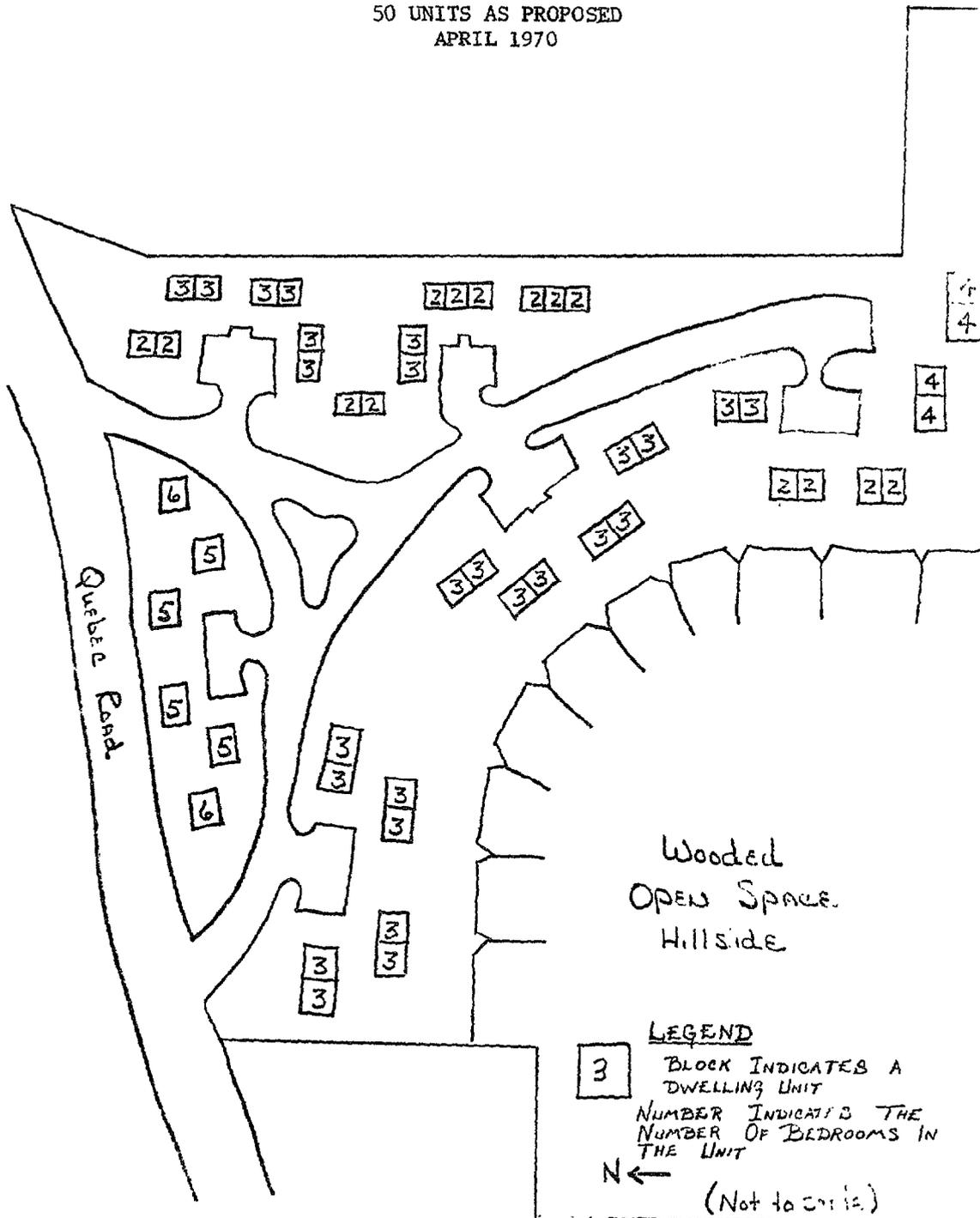
We identified a total of 260 individuals as officers, directors, or major owners of the 55 firms. We found that 39 of these individuals were each associated with more than one firm, as shown in the following table. No individuals were involved with more than two firms.

<u>Names of firms</u>	Number of individuals associated with both <u>firms</u>
Oxford Development Company and Westwood Terrace	10
Total Development Corporation and The Vector Company, Inc.	6
Ohio Turnkey Company and Thomas J. Dillon and Co., Inc.	12
Building Systems Housing Corporation and Housing Development Company	10
George Cimermancic Associates and Urban American Land Development Company	<u>1</u>
Total	<u>39</u>

The Republic Development Corporation and its wholly owned subsidiary, CFH, were the developers for two Ohio turnkey projects and for no projects in the other two States. Officers, directors, or owners of Republic and CFH were not shown as officers, directors, or owners of any other turnkey developers for which we obtained disclosure statements.

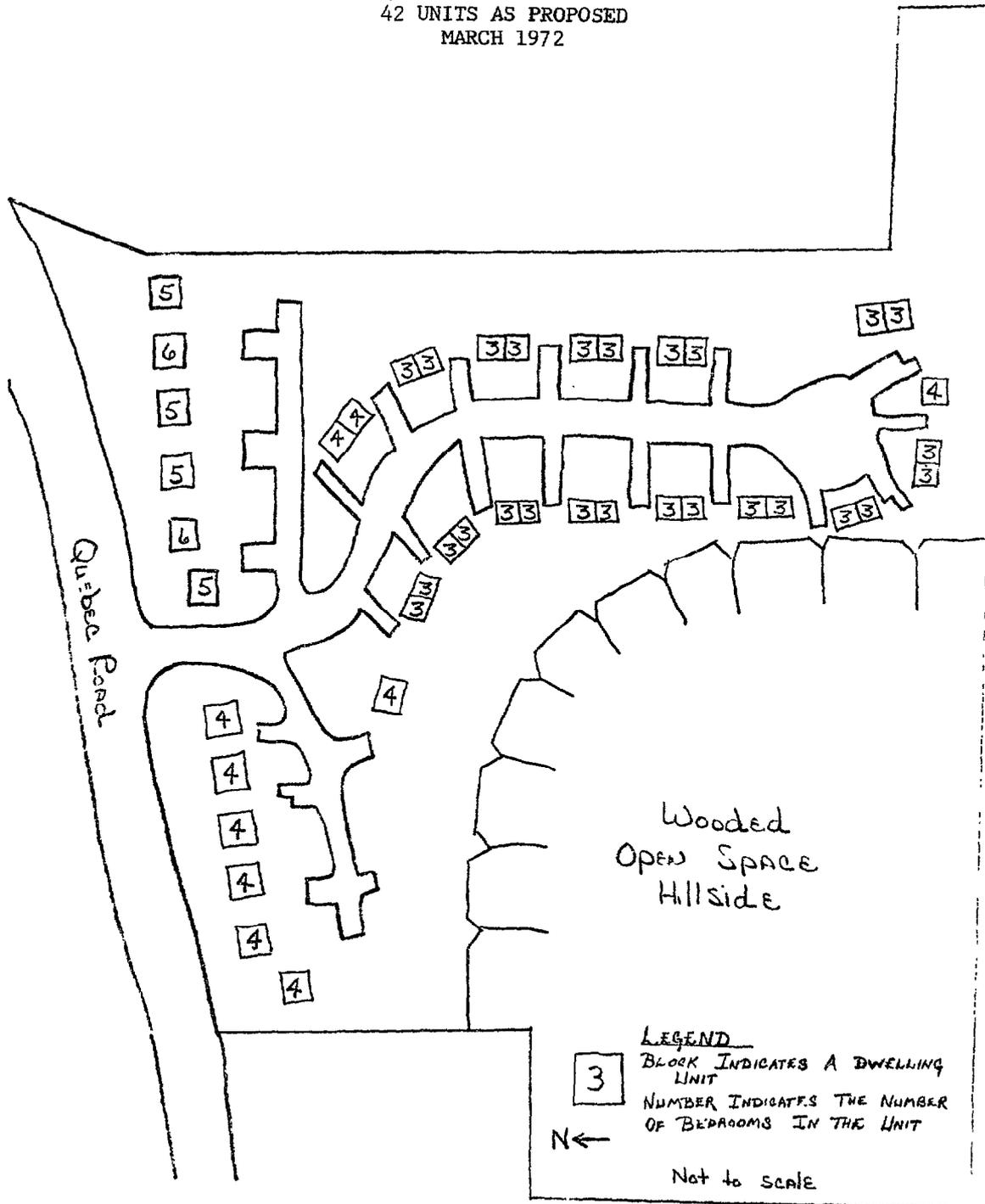
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QUEBEC ROAD PROJECT
50 UNITS AS PROPOSED
APRIL 1970



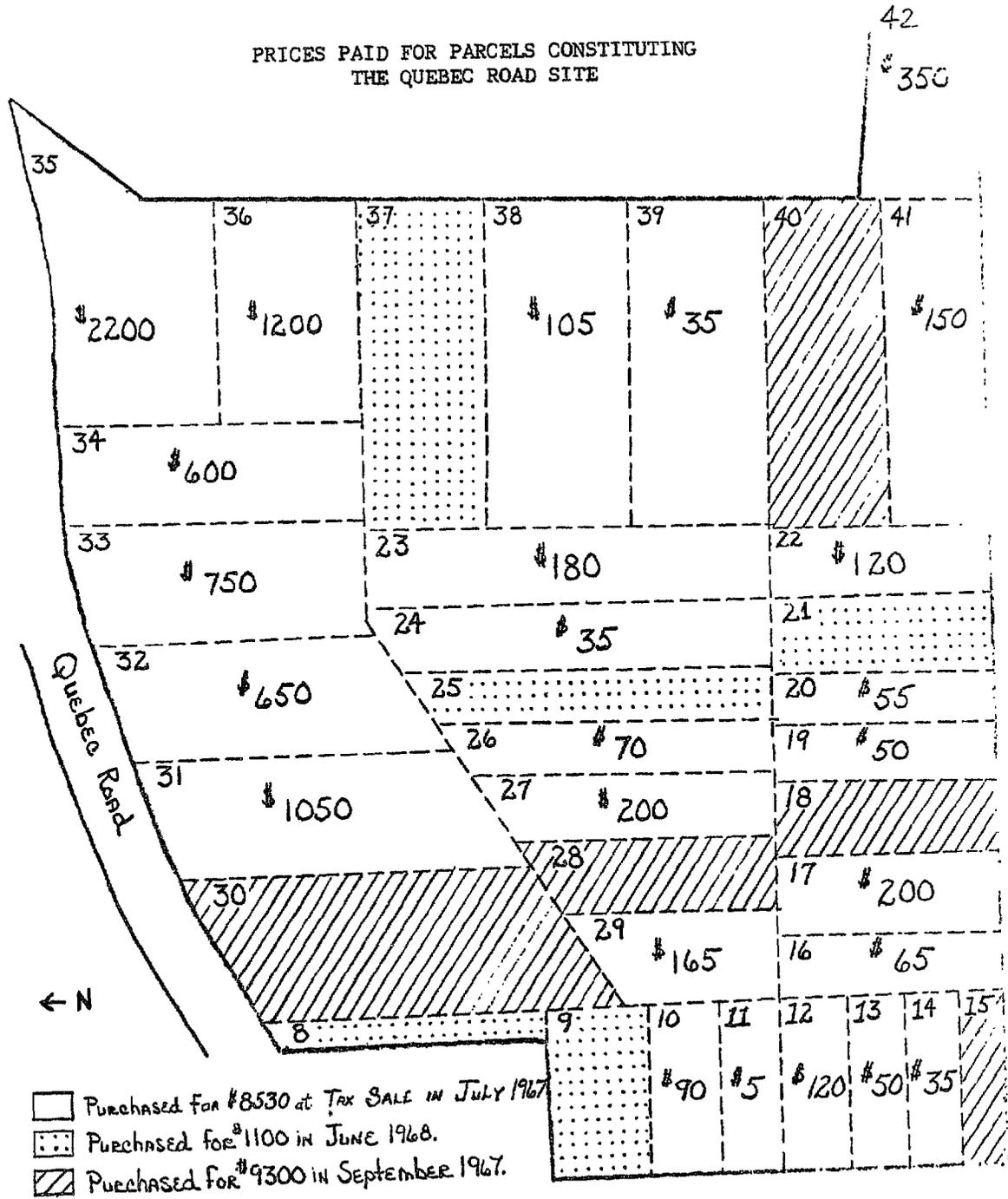
APPENDIX II

QUEBEC ROAD PROJECT
42 UNITS AS PROPOSED
MARCH 1972



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PRICES PAID FOR PARCELS CONSTITUTING THE QUEBEC ROAD SITE



APPENDIX IV

BEST DOCUMENT AVAILABLE

FIRMS HAVING CONTRACTS FOR TURNKEY PROJECTS

IN OHIO, KENTUCKY, AND MICHIGAN

FINANCED UNDER ANNUAL CONTRIBUTIONS CONTRACTS

EXECUTED FROM JULY 1968 THROUGH DECEMBER 1971

Name of firm	State in which firm organized	Number of projects (by State)			Total projects
		Ohio	Kentucky	Michigan	
Alco Universal Incorporated	Michigan			3	3
Alex Fodor Realty Company, The	Ohio	1			1
Alvey Brothers Lumber Company	Kentucky		1		1
American Modulars Corporation	Ohio	2			2
American Quality Homes, Incorporated	Michigan			1	1
Building Systems Housing Corporation	Ohio	2		2	4
C. C. Kaisers & Sons, Incorporated	Ohio	1			1
Charles V. Sims Development Corporation	Ohio	3			3
D&D Development Company	Michigan	1			1
Designed Communities, Incorporated	Ohio	2			2
Developers, Incorporated	Michigan			1	1
D-H Development Company	Ohio	1			1
Ed Szymanski Builders, Incorporated	Ohio	1			1
Forcum Lannom, Incorporated	Tennessee		4		4
Foundation Housing, Incorporated	Ohio	1			1
Four Star Builders, Incorporated	Michigan			1	1
Geert D. Mulder & Sons, Incorporated	Unknown			1	1
George Cimermanic Associates	Indiana	4			4
Hamel Construction, Incorporated	Michigan			1	1
Housing Associates	Ohio	3		1	4
Housing Development Company	Ohio	10		1	11
Joseph Skilken & Company	Ohio	4			4
King and Holman Construction Company	Michigan			1	1
Madden Incorporated	Ohio	4			4
Mateer-Pentecost Development Group	Michigan			1	1
Merrill Brothers Construction Company, Inc.	Michigan			1	1
M. Herbert General Contractors, Incorporated	Michigan			1	1
Midwest Turnkey Builders, Incorporated	Michigan			1	1
Modulage Homes	Ohio	1			1
Mortgage Consultants, Incorporated	Indiana	1			1
Mosser Construction, Incorporated	Ohio	1			1
Nathan Schafer, Incorporated	Michigan			1	1
Ohio Turnkey Company	Ohio	2			2
Orlean Company, The	Ohio	2			2
Oxford Development Company	Indiana	6			6
Q-H Associates, Incorporated	Michigan			1	1
Republic Development Corporation	Indiana	2			2
Rockwell Building Company	Unknown	1			1
Sanford Construction Company	Ohio	2			2
Satterfield Development Corporation	Indiana	1			1
Sharp Construction Company, Incorporated	Michigan			1	1
Simco Enterprises Development Corporation	Unknown	1			1
Site, Incorporated	Georgia		1		1
Smoot Development Corporation, The	Ohio	1			1
Stirling Homex Corporation	Delaware	1			1
Tempo Construction, Incorporated	Michigan			1	1
Thomas J. Dillon and Company, Incorporated	Ohio	9			9
Tipp-Smallwood	Ohio	1			1
Total Development Corporation	Kentucky		1		1
Turnkey, Incorporated	Ohio	1			1
Urban American Land Development Company	Michigan			1	1
Vector Company, Incorporated, The	Ohio	1			1
Westwood Terrace	Indiana	1			1
Woodmont Development Company	Ohio	2			2
X-TRA Developers, Incorporated	Ohio	1			1
Total		<u>78</u>	<u>7</u>	<u>22</u>	<u>107</u>

U.S. GAO, Wash., D.C.