



Circle of Leaders 2008 White Paper:

Understanding and Identifying Risks
Associated with Identity Misrepresentation
Within the Multi-Family Housing Industry

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Understanding and Identifying Risks Associated with Identity Misrepresentation Within the Multi-Family Housing Industry

Roundtable discussions from AmRent's nationwide Circle of Leaders program

Overview:

Identification and application misrepresentation has been well publicized in the mortgage originating, lending and servicing industries. Lately, however, the issue has found its way to the multi-family housing industry. Increasingly diverse applicant populations, liberties taken during the application process, applicant processing speed and a rise in identity fabrication make application misrepresentation a concern that every property manager needs to take seriously.

The reality is that property owners, management companies and housing professionals are faced with a difficult task. They must confirm the identities of those to whom they extend housing leases. The challenges are many: overstated incomes, fabricated and misused identities and misinformed beliefs about accurate and sufficient documentation needs for non-U.S. citizens and more. Further, the State and Federal Fair Housing laws most companies practice can be interpreted to conflict with a property manager's ability to freely vet an individual's true identity. It is a dangerous business practice to enter into lease agreements in which financial transactions will occur without accurately and thoroughly confirming applicants' identities.

The issues today with application and identity misrepresentation mean developing new, more cautious and diligent models to deal with rental/employment application documentation, identification and validation requirements, compliance and third party authentication. Understanding the challenges, available resources and viable solutions will reduce the risks and liabilities of property owners and managers.

This paper outlines the application misrepresentation business challenges our industry faces, common procedures and widely-used practices for managing application misrepresentation and the tools for successful authentication of personal identities during resident and employment screening processes. This information was collected over several months during Circle of Leaders roundtable discussion events.

Challenges with Current Authentication Processes:

As a whole, it is beneficial within the industry to have a better understanding of acceptable identification practices that can bolster the effectiveness of current methods and work within the compliance realm. While identifying these practices and developing new ones to yield more complete and accurate information, the industry must keep in mind application process speed.

The most viable solutions will not delay the point of lease transaction to impact a property's bottom line through frustrated applicants who lease elsewhere.

The most effective solutions also will work to fix the flaws of the current applicant authentication process during leasing. Current processes often are manual, time consuming, difficult to understand and full of risk. Of these flaws, the biggest complaint is that true verification is lengthy and laborious. On average, property managers report spending up to one hour to confirm each piece of provided identity information. There's no way around this, because the alternative could cost more money in the long run in legal fees, debt recovery and damages. Further, not validating applicant identities could impact the overall health of the community and create potential safety issues.

What the Circle of Leaders experts have to say about validating identities:

Property Management Expert: Chad Ketler – Director of Property Management, Community Properties of Ohio, Columbus, OH:

“We properly verify birth certificates, Social Security cards, other forms of identification and written statements from the parents. We also confirm sources for all information provided. We do our best to document and validate everything on the application.”

Legal Expert: Brian Cweren, Principal – Cweren Law Firm and MyApartmentLawyer.com, Houston, TX:

“Recently the *Houston Chronicle* ran a story about various forms of real and fake identification and it is obvious that one needs specialized knowledge to really be able to tell the difference. While this knowledge is available to law enforcement, it’s not readily available to property management staff and leasing agents. This is important knowledge for our industry to gain. We must educate each other.”

Property Management Expert Quote: Maria Stanton, Regional Director of Operations – Miller Valentine Group, Cincinnati, OH:

“We see a lot of invalid Social Security numbers which cause significant challenges throughout the credit process. While we can easily identify an invalid Social Security number, those belonging to the deceased, those that have never been issued and those tied to different names are harder to detect. Yet, we commonly face this with the application process.”

While all agree that the current authentication process to confirm a consumer’s identity presents some challenges, not having a solid process in place greatly impacts an organization’s overall bottom line. Consider the case of a large management company in Columbus, Ohio, that

reported 30 percent of its bad debt was related to unknown identities at an average loss of \$500 per debtor. If this company were to put in place a more stringent process, knowing the applicant’s full and complete identity would improve the overall results of any screening completed from that point forward. That’s a significant savings. Even the results of background checks can be negatively impacted if the true identity of the applicant is not fully vetted at the onset of the application process.

The Business Challenges Inherent in the Application Authentication Process: Social Security Numbers and Individual Tax ID Numbers

Many property owners have adopted the practice of automatically denying housing to those without a Social Security number. Although this may not be discriminatory on the surface, it could be considered discriminatory in practice. Further, it has the potential to exclude qualified applicants from renting apartments, decreasing the overall candidate pool from which an owner can fill vacant apartments.

Some non-U.S. citizen applicants provide Individual Tax ID numbers (ITIN) in place of a Social Security number on rental applications. The format of these two types of numbers is identical and property managers do not always understand how to differentiate.

Identification Documents

Identification documents presented to property managers in various forms make the authentication process very confusing and present situations that may lead to discriminatory actions. Despite this, property management companies have a fiduciary responsibility to owners and investors. Without accurate identification information, it’s hard to collect when renters cause damage and default on rent and other monies.

Full Disclosure

Further, when screenings do not include application questions about individual identities, previous residencies or criminal backgrounds, property managers are left exposed without legal protection in eviction action cases.

Judges and magistrates may question the due diligence process and rule on the side of the defendant or dismiss a case entirely, ultimately costing the owner/manager time and money. Finally, personal and property safety risks increase within communities when applicants – both employment and rental – are not fully vetted.

What the Circle of Leaders experts have to say about the importance of due diligence with applications:

Legal Expert Quote: William Willis, Jr. – Willis Law Firm, LLC, Columbus, OH:

“In a recent case I tried in Ohio, my client had a situation on the property involving a sexual predator. The case took an ugly turn when the magistrate questioned the application process used by my client. The magistrate said if it’s important enough for him to evict my client’s resident now, why wasn’t it important enough for my client to get the information before this situation ever started? From that point forward, I have told my clients that any unanswered question or an unfilled box on the application is not necessarily an indication of a false answer from the applicant, but it doesn’t mean it was an honest oversight either. Basically, all of the information needs to be completed by the applicant so we can know the true identity and history of the individual from the initial stages.”

Legal Expert Quote: Robert Flaucher – Dana and Pariser Law Firm, LLC, Columbus, OH: “Heaven help anyone who does not get an answer to a question on the application and then has one of those people commit a felony onsite. Then you have a bigger problem than identity theft or

collecting rent payments. I had a case in southern Ohio where the owner did not take complete information. Boxes on the application were left blank and the resident raped several children. The apartment community and its insurance company lost millions of dollars, not to mention the fear in the community and the negative publicity. While this example is beyond identity misrepresentation, it validates how important it is to have the application completely filled out. Sometimes the ramifications of incomplete application information are bigger than collecting rent and getting possession of the property.”

Solving Identity Misrepresentation Issues:

Solving identity misrepresentation issues will require changes in policies, procedures and thought processes. Further, it will take industry-wide diligence and patience to make the necessary changes. Viable solutions will come from the following areas:

- Rental/Employment Application Documentation
- Required Identifications and Validation Process
- Compliance
- Third Party Authentication Tools

Rental/Employment Application Documentation

Industry experts agree that properly documenting the applicant’s information in the earliest stages of the relationship reduces the likelihood of negative results including identity fraud. Starting with a solid information foundation to build the screening process reduces both liabilities and risks. Ideally, the rental application should be the launching pad from which the leasing team springs forward (with caution) toward the lease.

What the Circle of Leaders experts have to say about the importance of documentation:

Law Enforcement Expert Quote: Detective Doug Stewart – Criminal Investigation Division – Kettering, OH, Police Department:

“We commonly see applicants who list a friend’s phone number as their former place of residence. The friend acts as a cover to give the applicant a good recommendation, when in reality, the applicant never lived there. The application process is the point at which demanding accurate, truthful information should start. It is perfectly within your rights to tell applicants if they provide any type of false information, they will be prosecuted. In the state of Ohio, it is a felony to use someone else’s information and it’s relatively easy to pursue. If they wrote it on the application, you have the option to prosecute.”

Legal Expert Quote: Derrick Strahorn – Law Offices of Derrick A. Strahorn, Dayton, OH:

“Historically, I have noticed empty line items on applications tend to correspond with debtors that are the hardest to collect on, simply because of the missing or false information. This is a red flag. When you get an application back and there are spaces that have been left incomplete, your flag should go up. It seems simple, but make sure all the information is correct and complete.”

Collections Expert Quote: Rod Herper – National Credit Systems, Vice President of Sales, Atlanta, GA:

“When we don’t have complete information, we have nothing to go on when the lease situation sours. It is as much the property manager’s responsibility to get people into apartments as it is to get clear and accurate screening information that protects the property from future risk and liability. We are currently dealing with a collection situation for a commercial lease in which a landscape company was in town right after a

tornado and needed 10 apartments. All 10 were completely trashed, totaling \$80,000 in damages. Plus, all 10 leases were broken within three months. We want to pursue the landscape company for damages, but they are either out of business, changed their name, filed bankruptcy or started a new business. They made a quick buck and skipped town and my client is paying.”

Required Identification and Validation Process

Knowing how to accurately identify the hundreds of possible identification documents is a daunting task for anyone, including property management professionals. Using the U.S Department of Homeland Security U.S. Citizenship and Immigration Services Employers Handbook, www.uscis.gov/files/nativedocuments/m-274.pdf (Part Eight), property managers and owners can see visual references that will help validate the identifications presented as part of the application process. And, asking prospective renters to provide such documentation during the screening process to determine their employability does not violate the Fair Housing Act.

Data from the former Immigration and Naturalization Service indicated about 50,000 unauthorized aliens were found to have used 78,000 fraudulent documents to obtain employment over a 20-month period from October 1996 through May 1998. About 60 percent of the fraudulent documents were Immigration and Naturalization Services (INS) paperwork and

36 percent were Social Security cards. To assimilate more easily, it is not uncommon for many immigrants to unofficially change their names once they move to the United States. In addition, many people from Latin American cultures are given both their mother’s maiden name and their father’s last name at birth,

but decide along the way to shorten their name and use only one last name – effectively changing their identity. While neither of these behaviors may be done to purposely deceive, the name change constitutes a problem for property owners as their applicants have more than one identity. Property owners must evaluate whether the use of a different name on a rental application is due to these innocent practices or intentional fraud, adding yet another layer to the screening process.

What the Circle of Leaders experts have to say about being familiar with various types of documentation for non-U.S. citizens:

Property Management Expert Quote: Estella Everson – Community Manager, Michaels and Kohls, Inc., Columbus, OH:

“We deal with affordable housing, so it’s an entirely different ball game when it comes to the identification process. When the applicant comes in, they need to have a picture ID, Social Security number, birth certificates and Social Security card for kids. They have to declare if they are a citizen or a non-citizen. And non-citizens must show the proper paperwork. We have direct access to the INS Web site to input date of birth and other identifying information that will tell us if they are legally in the country.”

Property Management Expert Quote: Eileen Subinsky – VP of Michael Stevens Interest, Houston, TX:

“We found an apartment locator service in Texas that was faking documentation for employment and posing as the employer for applicants. Further, it was giving fake SSN numbers and names to bypass criminal screening. They would swap identities, using the identity of someone with a good background to get a lease for someone with a bad background. The properties where these renters were eventually placed didn’t know who they were truly leasing to. This service was eventually turned into the Texas Real-Estate Commission and some lost their real estate licenses.”

Collections Expert Quote: Rod Herper – National Credit Systems, Vice President of Sales, Atlanta, GA:

“We service many clients in Lexington and Danville, Kentucky. Drug dealing is a big issue in Danville and many people renting apartments from the small owners in Danville are not who they say they are. They are using fake or other people’s Social Security numbers and they’re running methamphetamine labs out of the apartments. The costs involved in cleaning up a meth lab are huge and the owners are just being hit very hard. Anything that could keep one of these drug dealers out of an apartment would be so helpful.”

Legal Expert Quote: William Willis, Jr. – Willis Law Firm, LLC, Columbus, OH:

“Citizenship is not protected under the Fair Housing laws. HUD took care of this a long time ago. National origin is protected and has a positive discriminatory impact because the only people affected are typically those who are not American nationals. A model to solve this problem is the one used in the Texas resident alien addendum. The second step is to get the additional information to go into plan B.”

Moving forward, industry experts expect to see more changes with the forms of identification being issued. According to The New York Times reporter, Jennifer Lee, travel documents are undergoing major changes that incorporate the latest technology for identifying individuals. Computer chips, fingerprints and face recognition will be the standard within the next few years on many passports and visas. Further, effective October 26, 2004, the State Department and immigration bureau was to begin issuing visas and other documents with the body-identifying technologies (biometrics) to foreign visitors. This change was mandated by border-security legislation passed by Congress May 2007.

The federal government has started issuing border-crossing cards for Mexican citizens and green cards that display fingerprints and photos. This means that the multi-housing industry will need to continue to educate site-level staff to ensure that proper and current identification documents are being supplied in the application process.

Compliance

When conducting the screening of an applicant, property management companies must consider federal, state and local laws in order to remain in compliance. Management should conduct training or utilize its current screening provider to educate staff members about the Fair Housing Act (FHA) and the Fair Credit Reporting Act (FCRA), as well as state and municipal codes in the markets its properties reside. Proper education assures the handling of the application process will be conducted without discrimination on the basis of race, color, religion, sex, disability, family status and/or national origin. The U.S. Department of Housing and Urban Development (HUD) provides clarity about citizenship status on its Web site: www.hud.gov/offices/fheo/library/sept11.cfm.

A landlord is not required to rent to any person who is not financially qualified. Landlords may ask prospective tenants questions to determine financial qualifications. Further, asking prospective tenants to provide documentation of citizenship or immigration status during the screening process to determine employability or financial status does not violate the FHA. HUD regulations outline the process for collecting and verifying such documents (sec 24CFR 5.506-5.512).

There is a lot of diversity in most U.S. rental community markets. Cultural, national origin and racial differences have traditionally been issues that the multi-family housing industry has addressed with varying degrees of success. If all federal, state and local laws are properly followed, it impacts communities positively.

What the Circle of Leaders experts have to say about diversity:

Property Management Expert Quote – Molly Carlson, CAM, CAPS Community Manager, Olentangy Village Associates, Columbus, OH: “We have an extremely diverse property due to our proximity to The Ohio State University. I have noticed an increase in resident referrals in the past couple of years, particularly from non-U.S. citizen residents. Once they get settled, they tell their friends and family about our community. We are paying more in resident referral fees, but we are gaining many qualified and stable residents. Our occupancy has improved by eight percent largely due to resident referrals of applicants from similar national origins.”

Securing Sensitive Data – FACT Act Disposal Rule

As property managers, compliance with the FCRA and FACT Act (Fair Credit Reporting Act and Fair and Accurate Credit Transactions) also is a key factor in protecting the private information collected during the application process. Not only do managers have the responsibility of making sure the owners’ investment is protected by vetting out possible risks, but they also are charged with the task of protecting the credentials and identities of the consumers from whom they take applications. This is easy if companies follow basic policies for record retention and disposal. The Federal Trade Commission (FTC) offers suggestions on its Web site at www.ftc.gov/infosecurity. Safeguarding sensitive data in resident files and on computers makes good business. If sensitive information is compromised, it can lead to fraud or identity theft. A sound data security plan is built on five key elements:

- Take stock: Know what personal information you have in your files and on your computers.
- Scale down: Keep only what you need for your business.

- Lock it: Protect the information in your care.
- Pitch it: Properly dispose of what you no longer need.
- Plan ahead: Create a plan to respond to security incidents.

Any business or individual using a consumer report for a business purpose is subject to the requirements of the FACT Act Disposal Rule. The Rule requires the proper disposal of information in consumer reports and records to protect against “unauthorized access to or use of the information.” The FTC, the nation’s consumer protection agency, enforces the Disposal Rule. More information can be found at www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt152.shtm.

Within the multi-family housing industry, landlords are listed as a category that must comply with proper disposal of personal information.

Recently the FACTA Red Flag Rules have been introduced and all regulated businesses must comply beginning Nov. 1, 2008. The Red Flag Rules outline more specific compliance by which a business must help to identify and deter identity theft. Specifically, the FTC, the federal bank regulatory agencies and the National Credit Union Administration (NCUA) have issued regulations (the Red Flag Rules) requiring financial institutions and creditors to develop and implement written identity theft prevention programs as part of the Fair and Accurate Credit Transactions (FACT) Act of 2003. The programs must provide for the identification, detection and response to patterns, practices or specific activities – known as “red flags” – that could indicate identity theft. More information can be found at www.ftc.gov/bcp/edu/pubs/business/alerts/alt050.shtm. As it is currently written, property owners and managers have not been listed in a category that “must” comply, but proactive organizations should build into their policies a prudent approach to this new law.

What the Circle of Leaders experts have to say about FACT Act Red Flag Rules:

Legal Expert Quote: Derrick Strahorn – Law Offices of Derrick A. Strahorn, Dayton OH: “Companies must develop and use strict confidentiality policies with respect to employees. Consider having employees sign confidentiality agreements upon employment. Employees have access to a lot of identity information and if one of them starts to sell or use that information, there could be a huge amount of liability just from a single employee. To protect your company from an information breach, have them sign an agreement or have a very clear policy. If something does happen, you have evidence that you took the necessary precautions.”

Third Party Authentication Tools

Some property managers use authentication tools – technology systems that provide the most accurate identity processing information available – as part of the screening process. These tools alert managers to name, address, date of birth and Social Security number variances or misuses, which allows for further investigation into an applicant’s identification documents. Any further steps taken by a manager – like asking for additional forms of identification, paystubs or IRS documents – should be done in accordance with written policies established by the management company.

In addition, online resources such as the U.S. Department of Treasury’s Office of Foreign Asset Control (OFAC) database assist property owners in identifying known or suspected terrorists. Resident screening companies typically offer OFAC as a service for a nominal fee, or include it as part of a screening package. The OFAC Web site offers more information at www.treas.gov/offices/enforcement/ofac/.

The ideal authentication solution is a comprehensive screening product using data from the authentication process to locate additional records related to criminal or housing activities in the consumer's past. Consider the table below for screening the same applicant with and without an authentication tool. Just notifying applicants that the information they submit is being scrutinized can be a deterrent to identification misrepresentation. If prospective renters know you are paying attention to every detail on the application and leasing staffs are asking questions about the information completed, the application should contain fewer errors or misstated content.

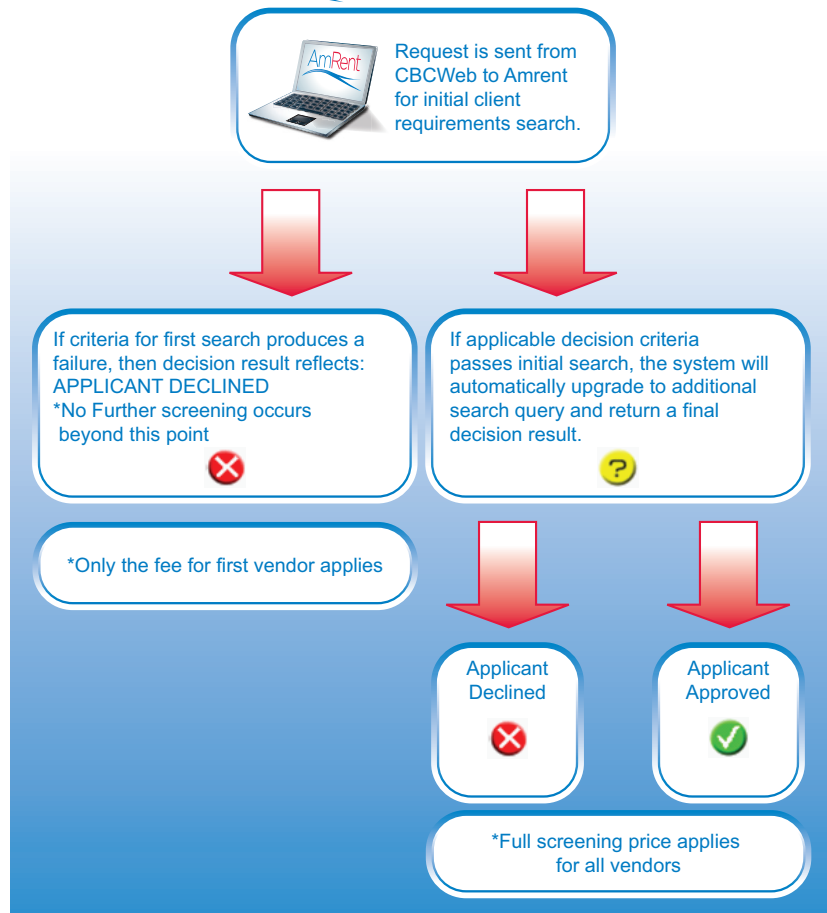
What the Circle of Leaders experts have to say about Authentication Tools:

Property Management Expert Quote: – Marc Cameron, CPM, Regional Director of Operations, Miller Valentine Group, Cincinnati, OH:

“One idea to alert applicants stopping into property management offices that you are serious about Identity Misrepresentation is to have a table tent-type sign on the closing table that also says “Identity Misrepresentation is a felony in the state of Ohio.”



AmRent's Decision Program Auto-Upgrade Process Flow



Case Studies – Successful Authentication Processes

With the issues that arise from identity authentication, there are tools and processes that can resolve them. From banks and mortgage lenders to employers, placement services and property owners and managers, every industry faces the challenge of properly qualifying their applicants.

Here are some success stories from companies that have instituted authentication processes.

KDM Management Uses Authentication Tools to Increase Profitability

CLIENT

Located in Pittsford, New York, KDM Management Development manages 42 residential mobile home communities, a total of 6,200 units. Chris Martin has been with the company since 2003, and KDM has been a member of AmRent since 2001.

ISSUE

KDM came to AmRent in need of better tools to qualify potential residents for its residential mobile home communities and to communicate that it had this ability among its property managers and the home office.

OBJECTIVE

The goal was to find residents with adequate credit scores and no previous collection issues. They also wanted to locate additional addresses prospective renters didn't provide on the application. KDM was looking for ideal residents who could maintain cash flow, which in turn, would help it run more efficiently.

STRATEGY AND TACTICS

Currently KDM accesses AmRent reports during the residential screening process. The Identity Cross-Check report – a verification and authentication tool that helps property management companies identify inconsistencies and potential fraudulent information – is key in the process. By

entering an applicant's name, Social Security number, address and phone number, property managers quickly determine if the information is accurate and if it matches previously reported data.

RESULTS

Chris Martin has halted several applicants because Identity Cross-Check confirmed false information. When KDM finds false data – such as reported Social Security numbers that belong to the deceased – it helps them avoid revenue losses that would have been associated with a fraudulent applicant. Considering that the typical fraud case can cost a company more than \$5,000, accurate screening information is a key ingredient of rental profitability. The Identity Cross-Check report from AmRent helps property managers improve their bottom line by quickly converting qualified applicants to residents, while reducing fraud and identity issues.

LumaCorp Uses Authentication Tools to Eliminate Fraud Potential

CLIENT

LumaCorp Inc. is a licensed real estate broker managing 17 properties with more than 4,250 units serving residents of Texas. Established in 1984, LumaCorp offers housing in Houston, Longview, Lufkin, Tyler and the Dallas-Ft. Worth metro area. Committed to its properties and residents, LumaCorp strives to maintain the highest standards in the real estate services industry. The company has received numerous awards for outstanding performance in apartment property management, including the President's Award and the Certified Property Manager of the Year Award from the Institute of Real Estate Management. LumaCorp also received the President's Award from the Apartment Association of Greater Dallas.

ISSUE

LumaCorp has used AmRent's resident screening services for several years, including Eviction Records, Credit Reports, Criminal Records and RentWise (a multi-family industry statistical risk model). Before partnering with AmRent, LumaCorp's goal was to process as many resident applications as possible within the same day because a fast turnaround not only enabled responses to applicants sooner, but also filled vacancies with qualified residents quicker. According to Phyllis Metevier, director of applicant screening for LumaCorp, AmRent's services helped the company meet and exceed this goal.

"Before we began using AmRent, we processed 250-300 applications per month and the approval process took two to three days," she explained. "AmRent enables us to process roughly 400 applications per month now, and the process can take as little as five minutes." In an effort to maximize the resident screening process even more, LumaCorp began looking for a way to verify Social Security numbers provided by resident applicants.

OBJECTIVE

LumaCorp's key objective was to find and implement an efficient and effective screening process to verify Social Security numbers provided by applicants, thereby reducing incidents of fraud.

STRATEGY AND TACTICS

LumaCorp implemented CBCInnovis' Identity Cross-Check Report in 2006. Now the company can review potential fraud-related information in an easy-to-read format, which isolates and summarizes information found in AmRent's report.

This information includes:

- Variations in name or address between the Innovis identification information and the applicant's information.
- Identity information for all consumers affiliated with the applicant's Social Security number.
- Fraud alerts, active military duty alerts, OFAC alerts and messages generated from proprietary fraud processes.
- In addition, Identity Cross-Check Report complies with the U.S. Patriot Act and Gramm-Leach Bliley Act.

Phyllis said LumaCorp receives approximately 100 applications per week, all of which are run through AmRent's resident screening services and Identity Cross-Check. "We request a copy of a person's Social Security card when the Identity Cross-Check Report shows different names associated with the number," she said. "This occurs in approximately 10 percent of the applications. If the applicant cannot provide proper identification, the screening process is halted until they can provide satisfactory identity verification documents. Many times the applicant doesn't return, which indicates there was obvious fraud."

RESULTS

Now LumaCorp is able to review potential fraud-related information for every single applicant, quickly and easily. "We're better able to screen them and allow some to move in with certain conditions," Phyllis explained. "Based on information from Identity Cross-Check, we have increased the number of conditional approvals by about 15 percent."

Phyllis said Identity Cross-Check has expedited the approval process too. "In April 2007, 68 percent of all applications were processed and approved on the same day," she explained.

"This is a very high percentage."

"Identity Cross-Check reports speed up both our response time to applicants and our ability to fill vacancies with qualified residents."

The amount of time spent researching an applicant's information has decreased significantly too. "I get enough information from Identity Cross-Check reports to effectively do my job. I input an applicant's Social Security number once and don't need to research other data sources, which can take an incredible amount of time," she said.

Summary

Knowing the true identity of each rental and employment applicant will lessen a property owner's potential for risk and liability. Further, it will make it easier to conduct any additional screening that might be needed if there's a situation that leads to an investigation. It's logical that false or misstated information fed into a screening provider's system during the application process will yield weak or even "false positive" results, leaving the property owner at a disadvantage. Sharpening your pencil during the initial stages of the application process to learn the most you can about an applicant will provide a more complete and accurate picture of who is actually living in your community. It also will provide leads to follow should any negative situations arise.

In the resident and employment screening world, more information is better. The path to more information starts with authentication tools that fully vet the accurate identity of each individual consumer. These tools vary in scope and sophistication, but the ideal solution provides additional data from public and non-public sources that can automatically locate records associated with criminal and housing histories. When authentication processes are working at their highest efficiency, more addresses, name variations and Social Security variances are found, which leads to the location of critical information that may have otherwise been uncovered by the property owner or employer.

Contact Information

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More Information

Reference Web sites

- www.cbcinnovis.com
- www.amrent.com
- www.ftc.gov
- www.ftc.gov/bcp/edu/microsites/idtheft/business/index.html
- www.ojp.usdoj.gov/bjs/abstract/it04.htm
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- www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idth04.pdf
- www.ftc.gov/bcp/edu/pubs/business/privacy/bus69.pdf
- www.bnd.com/277/story/378596.html
- www.kentucky.com/211/story/441829.html

Circle of Leaders

Circle of Leaders is a collective of property management industry executives across the United States working to share best practices for safer, more well-run and profitable communities.

The goal of the Circle of Leaders events in the spring of 2008 was to share knowledge and identify areas of concern related to the topic of identity and application misrepresentation. Industry experts discussed issues ranging from application processing to storing and managing personal data. Collectively, the group brainstormed solutions to combat the growing problem that identity crimes pose to the property management industry.

AmRent facilitated Circle of Leaders events across four cities.

Cincinnati: Circle of Leader event facilitators included Bobbisue Gabrielson and Linda Richer.

Columbus: Circle of Leader event facilitators included Kerry Wintrich and Linda Richer.

Dallas: Circle of Leader event facilitators included Monique Ivy and Chris Whipple.

Houston: Circle of Leader event facilitators included Wendy Pearson and Chris Whipple.

We want to thank all attendees who contributed during our Circle of Leaders seminars. Many industry leaders attended and heavily influenced the content of this White Paper. However, not everyone is directly quoted in this document. Below are bios of several of the guest specialists who have been quoted within:

Brian Cweren of Houston, Texas, is a graduate of the University of Texas School of Law, as well as a graduate of the University of Texas at Austin Business School where he majored in finance with an emphasis in real estate. Brian was admitted to the Texas Bar in 1997. He is principal of Cweren Law Firm and MyApartmentLawyer.com with a primary focus on Texas landlord/tenant law. General counsel to the Galveston County Apartment Association, he also serves on its board. In addition, he is an active supporter and member of the Houston Apartment Association, Galveston County Apartment Association, Texas Apartment Association and National Apartment Association.

Det. Doug Stewart, of Cincinnati, Ohio, has been a sworn law enforcement officer with police departments in the Miami Valley Region, Village of Germantown, Tipp City and more recently in Kettering, Ohio. Doug is assigned to the Criminal Investigation Section of the Kettering Police Department. His current responsibilities include the investigation of identity theft, fraud, forgeries and Internet crimes.

William L. Willis, Jr., of Columbus, Ohio, is principal at Willis Law Firm LLC, representing developers, residential and commercial management companies, construction firms, sellers, buyers and lenders involved in the real estate industry. He frequently writes industry articles for prestigious

publications and is a widely sought speaker, lecturer and teacher for the National Apartment Association's Certified Apartment Manager Program, as well as many universities and industry associations. Willis Law Firm was recently selected by the National Apartment Association to draft Ohio's version of the "National Lease." Bill is active in the industry and has served on the OHFA Tax Credit Compliance Advisory Committee and the Ohio Community Housing Board, among others. He currently serves on the Legislative Committee for the Columbus and Ohio Apartment Associations.

Derrick A. Strathorn of Dayton, Ohio, is a private practice attorney. Prior to opening his practice in 1995, he was with Lexis-Nexis, during which time he maintained a part-time private law practice. Derrick has handled cases in all of the local municipal courts in the Montgomery and Greene County areas, as well as in Butler, Warren, Hamilton, Franklin, Greene and Montgomery County Courts of Common Pleas in Ohio. He also has practiced in the United States Federal District Court for the Southern District of Ohio and the United States Sixth Circuit Court of Appeals. He has considerable experience in handling landlord-tenant, juvenile, domestic relations, collection and probate matters.

Rod Herper, of Cincinnati, Ohio, is vice president of Sales for National Credit Systems. Rod joined National Credit Systems in 2005 as account executive for the Midwest Region. National Credit Systems is the national leader in collections for the apartment industry. In Rod's current position, he leads a team of nine sales representatives for NCS.

Robert A. Flaucher, Esq. graduated from Marshall University with a B.A. and earned his J.D., cum laude, from Capital University Law School. Robert is licensed to practice in all federal and state courts in Ohio and West Virginia, and he has extensive experience representing creditors in the areas of consumer and commercial collections in both states. Rob's area of concentration also includes the representation of businesses in general and commercial litigation matters throughout Ohio and West Virginia. Additionally, Rob is an active participant in the Ohio State Bar Association; Columbus Bar Association; and West Virginia State Bar Association.