

Corporation for National and Community Service

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October 5, 2016

Ms. Luvina Beckley-Knight
CEO, M.H.M & Associates Enterprise, and
Interim Director, TCU Community Partnership (TCU)
2001 E. Financial Way
Glendora, CA 91741

Notice of Debarment From Participation in Federal Procurement and Nonprocurement Transactions

Dear Ms. Beckley-Knight:

Pursuant to 2 CFR Part 180, you are hereby provided notice that the Corporation for National and Community Service (CNCS) is debarring you from participation in all Federal procurement and nonprocurement transactions for a period of three (3) years. The period of this debarment begins on November 1, 2016 and extends until October 31, 2019.

You were informed of CNCS's proposal to debar you for a period of three (3) years by a letter sent to you on August 19, 2016. That notice set out, in detail, the facts and authorities on which the debarment decision would be based. In that letter, you were advised that if you wished to contest the proposed debarment, you must submit any information and argument in opposition, within 35 days of the date of the notice. CNCS received your response to the proposed debarment September 19, 2016, which was hand-delivered to CNCS Headquarters in Washington, DC by Ms. Tammy Watkins.

In your response, you maintain that the reasons for the proposed debarment, which that were set forth in my August 19, 2016 letter, were based upon erroneous information and conclusions, and accordingly, did not warrant debarment of you or the two organizations with which you are associated (i.e., M.H.M. & Associates Enterprise (MHM) and TCU Community Partnership (TCU)). However, after reading your response and its enclosures, I find that there is nothing in your response that causes me to alter my initial position, as stated in the August 19, 2016 debarment proposal, that your actions and those of your two organizations, MHM and TCU, were such that a three-year debarment is warranted.

Specifically, I remain convinced that TCU never performed any substantive work in Georgia under the RSVP grant, and that there is still no evidence that its two employees, (b)(6) and (b)(6), who both received salaries from federal (RSVP grant) funds, performed any substantive work on the RSVP grant. In addition, notwithstanding the attempts in your response to separate the activities of you, MHM and TCU, I am still convinced that TCU, while claiming to maintain a basic programmatic framework -- that enabled it to apply for, and be awarded, an RSVP grant -- was never in a position to actually carry out meaningful activities under the terms and conditions of the RSVP grant, and furthermore, accepted and misapplied federal funds under the grant, thus benefitting you personally, as well as MHM, a for-profit organization.

Accordingly, based upon the reasons set out in the August 19, 2016 notice of proposed debarment, which is hereby incorporated by reference, and further discussed above, I hereby confirm my earlier decision to debar you for a period of three (3) years. This debarment is based on a determination that you--

- Violated the terms of a public agreement or transaction so serious as to affect the integrity of a Corporation program (2 C.F.R. §180.800(b)); and
- Engaged in inappropriate activity that was of so serious and compelling a nature that it affects your present responsibility to engage in transactions with the Federal Government. (2 C.F.R. § 180.800(d)).

This debarment is effective for the following "covered transactions" as specified in 2 CFR Part 180--

- Procurement contracts that are subject to the Federal Acquisition Regulations (48 CFR chapter 1); and
- Nonprocurement transactions, including (but not limited to)
 - Grants
 - Cooperative agreements
 - Scholarships
 - Fellowships
 - Contracts of assistance
 - Loans
 - Loan guarantees
 - Subsidies
 - Insurances
 - Payments for specified uses, and
 - Donation agreements.

Under this debarment, you are prohibited from engaging in any covered transaction with any agency throughout the executive branch of the Federal Government. In addition, under individual agency regulations, this debarment may prohibit you from engaging in covered transactions with other persons or organizations who are directly or indirectly participating in covered transactions with the agency. The head of a federal agency (or authorized designee) may grant you an exception from this debarment.



Jeffrey Page
Debarment Official

Cc: (b)(6)
President, Board of Directors
TCU Community Partnerships
(b)(6)