



COMPTROLLER'S INVESTIGATIVE REPORT

Serenity Homes of TN LLC, Church & Chapel Funeral Service, LLC, and Restlawn Memory Gardens LLC

November 19, 2024

Jason E. Mumpower
Comptroller of the Treasury



DIVISION OF INVESTIGATIONS



JASON E. MUMPOWER
Comptroller

November 19, 2024

District Attorney General Ray Whitley
113 West Main Street, 3rd Floor
Gallatin, TN 37066

Attorney General Whitley:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the Serenity Homes of TN LLC, Church & Chapel Funeral Service, LLC, and Restlawn Memory Gardens LLC, and the results are presented herein.

Copies of this report are being forwarded to Governor Bill Lee, the State Attorney General, the District Attorney General of the 18th Judicial District, certain state legislators, and various other interested parties. A copy of the report is available for public inspection in our Office and may be viewed at <http://www.comptroller.tn.gov/ia/>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason E. Mumpower", with a long horizontal flourish extending to the right.

Jason E. Mumpower
Comptroller of the Treasury

JEM/MLC

INVESTIGATIVE REPORT

Serenity Homes of TN LLC, Church & Chapel Funeral Service, LLC, and Restlawn Memory Gardens LLC

The Office of the Comptroller of the Treasury, in conjunction with the Tennessee Bureau of Investigation, investigated allegations of malfeasance related to Eileen Santangelo and her involvement with a business she co-founded, Serenity Homes of TN LLC. This investigation was initiated upon the request of the District Attorney General of the 18th Judicial District, pursuant to Tenn. Code Ann. § 8-4-209. The investigation was limited to selected records for the period January 27, 2017, through October 7, 2024. The results of the investigation were communicated with the office of the District Attorney General of the 18th Judicial District.

BACKGROUND



Serenity Homes of TN LLC (SHTNL) was formed in August 2019 in Portland, Tennessee, by Eileen Santangelo and a longtime acquaintance. Both Santangelo and SHTNL's co-founder were residents of Portland, Tennessee. Santangelo and her spouse also owned and operated Church & Chapel Funeral Service, LLC, which is located in Portland, Tennessee, and Restlawn Memory Gardens LLC, which adjoins Church & Chapel Funeral Service, LLC, but is officially located in Franklin, Kentucky. The co-founder of SHTNL was a retired person who owned several rental properties in Portland, Tennessee.

SHTNL's business purpose was acquiring, rehabilitating, and reselling homes. Among the first properties that it acquired in early 2020 was a home acquired on credit that Santangelo was already using as a residence. That home was sold to SHTNL by a disabled individual who used a wheelchair. Santangelo arranged for a private lender to loan money to the disabled individual to purchase that home in 2018 when she had previously been living there and owed unpaid rent to her landlord. The disabled individual moved into the home with her and subsequently purchased the home using the loan. The private lender was eventually repaid for the home loan when SHTNL bought the

home in 2020. Immediately after being repaid for the home loan, the private lender invested funds into Santangelo's cemetery and funeral businesses.

SHTNL's co-founder was diagnosed with moderate-to-severe cognitive illness in 2021. The co-founder created a revocable trust in January 2017 with the co-founder's heirs as beneficiaries so that the rental properties and derived proceeds could be passed to them outside of the probate process. The co-founder's residence was also placed into that trust. Santangelo initiated a Chapter 11 Bankruptcy filing for SHTNL in March 2023, and per the filing documents, the co-founder no longer held any "interest" as a "member" of SHTNL after September 2022. The co-founder passed away in May 2023 and was buried at the Restlawn Memory Gardens, LLC cemetery. Per statements from one of the co-founder's heirs, there was still no grave marker or headstone at the co-founder's burial site as of October 1, 2024.

Pursuant to Tenn. Code Ann. § 39-15-502, it is an offense for any person to knowingly financially exploit a vulnerable adult. Tenn. Code Ann. §§ 39-15-501(7)(A) and (C) define financial exploitation as the use of deception, intimidation, or undue influence to obtain or exert unauthorized control over a vulnerable adult's property with the intent to deprive the vulnerable adult of property, or the act of a caregiver in obtaining or exercising control over a vulnerable adult's property without receiving their effective consent and with the intent to benefit the caregiver or other third party.

RESULTS OF INVESTIGATION

1. EILEEN SANTANGELO MISAPPROPRIATED AT LEAST \$804,247.83 FROM MULTIPLE INDIVIDUALS VIA HER BUSINESSES SERENITY HOMES OF TN LLC, CHURCH & CHAPEL FUNERAL SERVICE, LLC, AND RESTLAWN MEMORY GARDENS LLC

A. Eileen Santangelo misappropriated at least \$687,763.05 belonging to the trust created by the co-founder of Serenity Homes of TN LLC

Santangelo misappropriated at least \$687,763.05 belonging to the co-founder's trust. These misappropriations were carried out via three separate means, and they all transpired concurrently with or subsequent to the co-founder's diagnosis of moderate-to-severe cognitive illness. Investigators determined that due to Santangelo's routine use of SHTNL's funds for her personal benefit, including addressing the financial needs of her other businesses, SHTNL was often left with insufficient funds to cover its own obligations.

1) Santangelo misappropriated at least \$403,600 by misleading the co-founder to assign the co-founder's residence to her via a quitclaim deed upon the co-founder's passing

Santangelo misappropriated at least \$403,600 from the co-founder's trust by misleading the co-founder to assign his residence over to her via a quitclaim deed. Property appraisal data from the State of Tennessee valued the co-founder's property at \$403,600. The co-founder signed the quitclaim deed on April 5, 2023, approximately

18 months after his initial diagnosis of moderate-to-severe cognitive illness and approximately six weeks prior to his death in May 2023. Santangelo attended medical appointments with the co-founder and was aware of the moderate-to-severe cognitive illness diagnosis at the time the quitclaim deed was signed.

Investigators obtained property deed records that showed Santangelo separately obtained three loans totaling \$390,000 against the property subsequent to the co-founder's passing in May 2023. Santangelo obtained a \$75,000 loan in November 2023, a \$40,000 loan in March 2024, and a \$275,000 loan in September 2024. All were secured by a deed against the co-founder's residence. All loans were obtained from separate lenders.

- 2) *Santangelo misappropriated at least \$279,173.77 from the sale of rental properties that had been placed in the co-founder's trust for the benefit of the trust's heirs*

The co-founder started treatment for moderate-to-severe cognitive illness in August 2021. Investigators determined that between August 2021 and December 2021, five of the properties held in the co-founder's trust created for the benefit of the co-founder's heirs were sold. None of those funds were used for the co-founder's benefit or the benefit of the trust. Net proceeds totaling \$279,173.77 were initially received after the sales were finalized. However, the proceeds were never maintained in the co-founder's trust and were instead transferred to other accounts, enabling Santangelo to use them for her personal benefit.

- 3) *Santangelo misappropriated at least \$4,989.28 of funds paid directly to her for the benefit of the co-founder's trust*

Since February 2023, Santangelo collected at least \$4,989.28 on behalf of the co-founder's trust, and she retained those funds for her personal benefit. A \$289.28 portion of the total was an amount paid to Santangelo to cover the property tax bill for a property in the co-founder's trust. Santangelo collected the funds but never paid the bill. The remaining balance of \$4,700 consists entirely of payments made on a 30-year promissory note for a property the co-founder sold to a tenant in 2010. Those payments have been collected by Santangelo since the co-founder's death in May 2023, but the funds have not been retained for the benefit of the co-founder's trust, nor have they been remitted to the trust's beneficiaries. The person who made those payments stated to investigators that Santangelo has been living in the co-founder's residence since the co-founder passed away.

Summary of Misappropriation from Trust		
Section	Description	Amount
1.	Co-founder's residence	\$ 403,600.00
2.	Co-founder's rental properties	\$ 279,173.77
3.	Funds collected for trust	\$ 4,989.28
Total		\$ 687,763.05

B. Eileen Santangelo misappropriated at least \$14,150 from the Serenity Homes of TN LLC co-founder by using the co-founder’s credit card to make purchases from her other businesses

Santangelo misappropriated at least \$14,150 from the co-founder by making multiple purchases from her other businesses with his credit card from October 2020 until May 2021.

- 1) *Santangelo charged \$6,500 to the co-founder’s personal credit card when SHTNL had insufficient funds in October 2020*

Santangelo’s misuse of SHTNL’s funds for her personal benefit left its bank account with a balance of only \$21.52 as of October 26, 2020. On October 27, 2020, Santangelo charged the co-founder’s credit card \$6,500 at another business she owned, and after processing fees, this enabled her to transfer \$6,300 to another bank account she controlled. Santangelo then transferred those funds through two separate bank accounts to place the funds into the SHTNL bank account. From there, she used those funds to make three payments totaling \$6,109.59 on loans secured by SHTNL properties.

- 2) *Santangelo charged \$900 to the co-founder’s personal credit card when Church & Chapel Funeral Service, LLC had insufficient funds in March 2021*

The Church & Chapel Funeral Service, LLC bank account had a balance of only \$52.34 on March 8, 2021. Santangelo charged \$900 to the co-founder’s personal credit card to the Church & Chapel Funeral Service, LLC credit card processor on March 5, 2021, which enabled \$855.32 to post to the Church & Chapel Funeral Service, LLC bank account on March 8, 2021. Santangelo promptly withdrew the deposited funds in cash.

- 3) *Santangelo charged \$6,750 via three credit card transactions to the co-founder’s personal credit card when Church & Chapel Funeral Service, LLC had insufficient funds in May 2021*

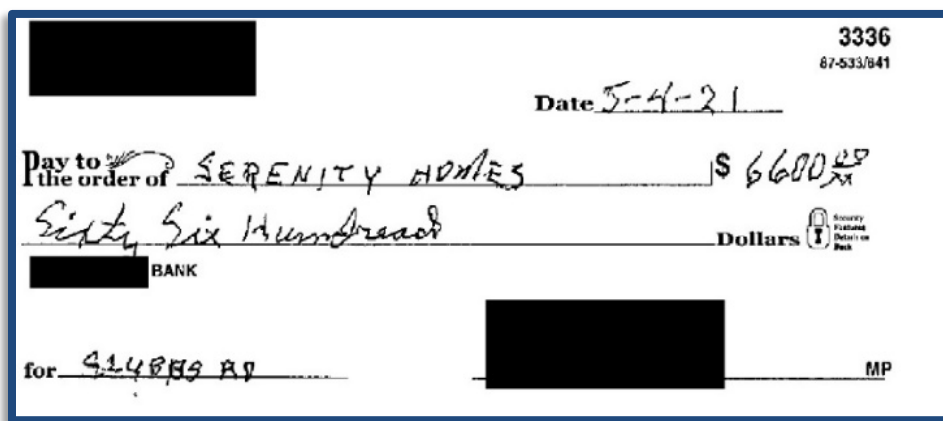
The Church & Chapel Funeral Service, LLC bank account had a balance of only \$5.16 on May 21, 2021. Santangelo charged the co-founder’s personal credit card three times to the Church & Chapel Funeral Service, LLC credit card processor from May 21, 2021, through May 26, 2021, for a total of \$6,750. The Church & Chapel Funeral Service, LLC bank account then paid \$6,200 in expenses between May 21, 2021, and the end of the month.

Summary of Misappropriation via Credit Card		
Section	Month	Total Charged
1.	October 2020	\$ 6,500.00
2.	March 2021	\$ 900.00
3.	May 2021	\$ 6,750.00
Total		\$ 14,150.00

C. Eileen Santangelo misappropriated \$6,600 from the Serenity Homes of TN LLC co-founder by causing the co-founder to pay Serenity Homes of TN LLC for a false purpose

The co-founder made a non-routine \$6,600 payment to SHTNL via check on May 4, 2021 (**Refer to Exhibit 1**). The check’s “memo” line referred to real property located on Clubbs Road in Portland, Tennessee, which SHTNL owned and for which SHTNL owed over \$150,000 on a loan. Santangelo made five transfers between different accounts before all \$6,600 of the funds were expended. Once those funds were deposited into the SHTNL account, Santangelo transferred \$5,000 to a Restlawn Memory Gardens LLC bank account. From there, the funds were used to satisfy a \$4,690 cemetery debt as well as to transfer funds via Cash App to Santangelo’s relative in Maryland. The remaining \$1,600 was used to make a combination of personal and business-related payments from Santangelo’s other accounts. These included a \$900 payment by Church & Chapel Funeral Service, LLC for its office rent, a \$480 check for “payroll” for Restlawn Memory Gardens LLC, and a \$600 payment to an addiction treatment center in Havre de Grace, Maryland. Later, in 2021, Santangelo’s relative started a business called Serenity Homes of MD LLC in Belcamp, Maryland.

Exhibit 1



Check the co-founder paid to SHTNL for “Clubbs Rd” in May 2021

D. Eileen Santangelo misappropriated at least \$91,246.18 of a \$100,000 investment into her other businesses

Santangelo acquired \$100,000 from an individual as an investment into Church & Chapel Funeral Service, LLC and Restlawn Memory Gardens LLC in March 2020. Investigators determined that Santangelo received a net investment of \$99,935 after a wire transfer fee was assessed. Upon receipt of the funds, she subsequently directed 25 total transfers of portions of those funds to other bank accounts under her control. The transfers enabled her to conceal that she misappropriated at least \$91,246.18 of the investment by using the funds for personal expenses, including a trip to Australia, a loan payment for a car in her spouse’s name, SHTNL expenses, and other non-cemetery and non-funeral expenses. The largest

single non-cemetery or non-funeral expense was subsequent to a \$70,000 transfer of the funds to her personal checking account. After the transfer, she made a \$27,800 payment, satisfying the balance of what was owed to the same investor for the 2018 loan the disabled individual used to acquire the residence she was previously renting on Beaver Creek Drive in Portland, Tennessee. The investor was unaware that the invested funds were being used to make the payment.

Santangelo lived in the home on Beaver Creek Drive in Portland, Tennessee, prior to 2018. Santangelo was served with a summons regarding \$7,000 of unpaid rent at the home on Beaver Creek Drive in November 2017. On the same day it was served, a person described to investigators as a wheelchair-bound amputee established residency on the person's State of Tennessee Driver's License at the same home on Beaver Creek Drive. Per deed records, this disabled individual subsequently purchased the home on Beaver Creek Drive in June 2018 via a loan from the future investor, and Santangelo continued to reside there. The loan and purchase were all arranged by Santangelo per documents obtained by investigators.

According to the investor, there were ongoing issues with late and missed payments on the home loan. All payments were made by Santangelo and not by the disabled individual. In March 2020, SHTNL obtained a loan from another lender and purchased the property from the disabled individual by paying off the loan from the investor. SHTNL sold the home in July 2021, and the disabled individual and Santangelo moved to another SHTNL property at that time. Per a death certificate, the disabled individual died at that location (the other SHTNL property) in January 2022 and was cremated at the direction of Church & Chapel Funeral Service, LLC.

E. Eileen Santangelo spent at least \$4,488.60 using two deceased persons' credit cards for her personal benefit

Investigators determined the disabled individual opened a credit card in April 2018 while living at the residence on Beaver Creek Drive. Santangelo was concurrently listed as an authorized user on the account. The disabled individual died in January 2022. Investigators determined that after the disabled individual's death, Santangelo continued to use his credit card to make over 70 purchases for a total of \$3,136.42 through December 2023.

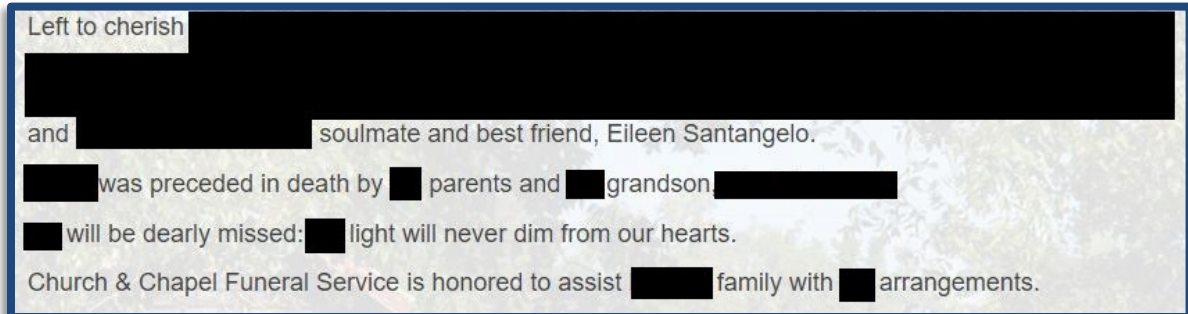
Santangelo obtained access to the SHTNL co-founder's credit card, and she retained it after he passed away in May 2023. Santangelo used the credit card 24 times for a total of \$1,352.18 of purchases after the co-founder's death. This included a \$281.87 purchase of a dress on May 23, 2023, at a department store (**Refer to Exhibit 2**). This was the week after the SHTNL co-founder's funeral, which was on May 21, 2023 (**Refer to Exhibit 3**). Investigators determined that Santangelo's relative, who started Serenity Homes of MD LLC, had a wedding in Maryland on May 25, 2023, and pictures in public Facebook posts show that she was in attendance. Investigators noted that Santangelo and her spouse each had access to and regularly used credit cards in their own names from at least November 2019 through the end of 2023.

Exhibit 2



Receipt from purchase made by Santangelo using SHTNL co-founder's credit card after co-founder's death

Exhibit 3



Excerpt from the co-founder's obituary from the Church & Chapel Funeral Service, LLC website, which listed the co-founder's funeral as May 21, 2023

Summary Table of Misappropriation (All Methods)			
Method	Co-founder	Investor	Disabled Individual
A. Misappropriation from trust	\$ 687,763.05	\$ 0.00	\$ 0.00
B. Misappropriation via credit card before death	\$ 14,150.00	\$ 0.00	\$ 0.00
C. Misappropriation via check for false purpose	\$ 6,600.00	\$ 0.00	\$ 0.00
D. Misappropriation of invested funds in other businesses	\$ 0.00	\$ 91,246.18	\$ 0.00
E. Misappropriation via credit card after death	\$ 1,352.18	\$ 0.00	\$ 3,136.42
Subtotals	\$ 709,865.23	\$ 91,246.18	\$ 3,136.42
Total Misappropriation – All Methods			\$ 804,247.83

On November 6, 2024, the Sumner County Grand Jury indicted Eileen Santangelo on three counts of Theft of Property over \$250,000, two counts of Financial Exploitation of an Elderly or Vulnerable Person over \$250,000, two counts of Money Laundering Offenses, one count of Illegal Possession or Fraudulent Use of a Credit or Debit card over \$10,000, and one count of Illegal Possession or Fraudulent Use of a Credit or Debit card over \$1,000.

The charges and allegations contained in the indictment are merely accusations of criminal conduct, and not evidence. The defendant is presumed innocent unless and until proven guilty beyond a reasonable doubt and convicted through due process of law.

[Serenity Homes of TN LLC, Church & Chapel Funeral Service, LLC, and Restlawn Memory Gardens LLC Investigation Exhibit](#)