



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



Inspector General
Accredited

“Enhancing Public Trust in Government”

**Redacted per §119.071(5)(b) and (5)(f)1,
F.S., and U.S.C. §9058a(4)(A)**

Investigative Report

2021-0016

Inaccurate Information on Riviera Beach CARES Act Rental Assistance Application

March 1, 2023



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INVESTIGATIVE REPORT 2021-0016

DATE ISSUED: MARCH 1, 2023



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SUMMARY

WHAT WE DID

The Palm Beach County (County) Office of Inspector General (OIG) received a complaint from the Palm Beach County Community Services Department (Community Services) concerning the applications of a Riviera Beach, Florida resident (Applicant) to the County Coronavirus Aid, Relief, and Economic Security (CARES) Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program (Program). Community Services alleged that Applicant submitted rental assistance applications (No. 25392, 37830, and 42027) for the same location after creating two separate application accounts using different email addresses and social security numbers. Applicant submitted applications No. 37830 and 42027 within two days of each other requesting the same amount of rental assistance for the same address¹ and for the same period of

time, but providing different social security numbers and email addresses for herself. According to Community Services, the duplicative submissions resulted in Applicant receiving rental assistance that "exceeded the cap" by \$4,500.00. The complaint further noted that applications 37830 and 42027 listed the same address for Applicant and her landlord.

Based upon our initial review of Applicant's applications and accompanying documents, the OIG initiated an investigation of the following allegation:

Allegation (1): The Applicant provided inaccurate information in her rental assistance applications, which resulted in improper grant funding from a County program.

During the course of our investigation, Applicant submitted three additional rental assistance applications (No. 7132,

¹ Applicant spelled her street address as "Hendley" in application 37830, but misspelled it as "Henley" in one section of application 42027.

This document is being presented for your response in accordance with the Palm Beach County Inspector General Ordinance, Article XII, Section 2-427. Pursuant to § 119.0713(2) and § 112.3188, Florida Statutes, this draft document is confidential and exempt from disclosure until our audit, investigation, or review is complete and our audit, review, or investigative report becomes final. Pursuant to § 119.10(2)(a), Florida Statutes, any person who willfully and knowingly violates any provision of Chapter 119, Florida Statutes, commits a misdemeanor of the first degree, punishable by a term of imprisonment of up to one year and a fine of up to \$1,000. If you receive a request to inspect or copy this draft document after we issue a Final Report stamped "Redacted", you should contact the Palm Beach County Office of Inspector General prior to the release of this draft document, or any portion thereof, as it may contain material that must be redacted in accordance with Chapter 119, Florida Statutes, or other applicable state or federal laws.

172338, and 154457), which were denied. Our office reviewed Applicant's rental assistance applications, supporting documents, and the program guidelines. We also interviewed Community Services personnel, the Applicant's landlord, and attempted to interview the Applicant.

WHAT WE FOUND

Allegation (1) is supported. We found that the Applicant submitted inaccurate information to the County on her rental assistance applications.

As a result of her actions, the County approved the Applicant's rental assistance applications dated October 29, 2020 and October 30, 2020, and issued duplicate payments of \$4,500.00 to her landlord (Landlord). The inappropriate payment resulted in Identified Costs² of \$4,500.00.

WHAT WE RECOMMEND

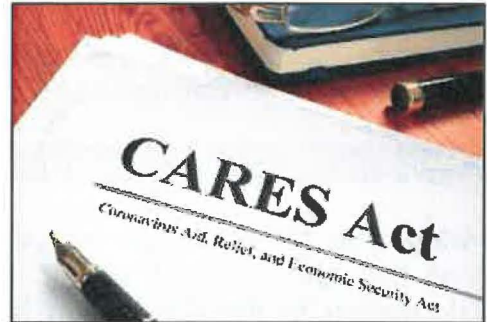
We make one recommendation; that the County seeks reimbursement of \$4,500 in issued funds.

² Identified costs are costs that have been identified as dollars that have the potential of being returned to the entity to offset the taxpayers' burden.

BACKGROUND

The CARES Act

On March 1, 2020, Florida Governor Ron DeSantis directed the State Health Officer to issue a public health emergency in the State of Florida due to the COVID-19 pandemic. On March 13, 2020, then-Palm Beach County Mayor Dave Kerner declared a state of emergency in the County due to COVID-19.



On March 27, 2020, the President of the United States signed the CARES Act into law. The CARES Act allocated \$2.2 trillion in economic relief to individuals, businesses, and governments affected by COVID-19. State governments were allocated a total of \$139 billion based on their populations (as measured by the U.S. Census Bureau in 2019), with no state receiving less than \$1.25 billion. Florida received a total of \$8.328 billion, with \$261,174,832 of that total provided to Palm Beach County.

On May 15, 2020, the Palm Beach County Board of County Commissioners dedicated \$40 million of the approximately \$261 million allocated to it for "Emergency Mortgage, Rental and Utility Assistance." Community Services administrated the Rental Assistance portion of this funding.

CARES Act Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program Guidelines

The CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program was designed to utilize CARES Act funds to provide one-time rental and utility assistance to eligible County residents who experienced loss of income, reduction in hours, or unemployment as a direct result of the COVID-19 pandemic. The Community Services website explained that in order to be eligible for the program, the applicant must reside within the corporate limits of Palm Beach County and have documentable information to evidence loss of income, reduction in hours, or unemployment because of the COVID-19 pandemic that contributed to missed rental payments and/or utility payments. Eligibility guidelines on the website also listed the income and asset requirements to qualify for the program. Assistance was provided for past due rent and/or utilities due from March 1, 2020 to December 31, 2020.

Emergency Rental Assistance Program

On March 9, 2021, under the authority of the U.S. Department of Treasury Emergency Rental Assistance (ERA) Program 1 (as established by the Consolidated Appropriations Act, 2021) and 2 (as established by section 3201 of the American Rescue Plan Act of 2021), the Palm Beach County Board of County Commissioners (BCC) approved ERA-1 funding to assist Palm Beach County residents affected by COVID-19 with rental and

utility assistance. On August 17, 2021, the BCC approved ERA-2 funding for the same purpose.

Eligible Palm Beach County households are renter households in which one or more individual(s) meets all of the following criteria:

- For ERA-1, qualifies for unemployment or experienced a reduction of household income, incurred significant costs, or experienced other financial hardships **due to** COVID-19 (either directly or indirectly), or for ERA-2, qualifies for unemployment or experienced other financial hardships **during or due to** (either directly or indirectly) COVID-19;
- Demonstrates a risk of homelessness or housing instability; and
- Has a household income at or below 80% of the area median.

Rental Assistance Applications

The County accepted applications electronically on the Community Services Online System for Community Access to Resources and Social Services (OSCARSS). OSCARSS required applicants to upload certain supporting documentation, including identification, a rental lease agreement, and a Balance Statement from the landlord. The Balance Statement was to be completed by the applicant's landlord or property manager and was to reflect the amount of rent owed by the applicant.



The form of the application differed slightly throughout the program, but each included eligibility questions and acknowledgements. Applicants were required to affirm these statements by digitally checking a box next to each one.

The Acknowledgment section for applications No. 25392, 37830, 42027, 71325, and 154457 included the following:

- I further certify that I have read³ the above information and, to the best of my knowledge and belief, the information is accurate and has been properly recorded. Additionally, I understand that I am responsible for the accuracy of the information provided and that said information will be used as a basis for determining my eligibility for services. **I also understand that any falsification or misrepresentation of this information is just cause for denial of services and prosecution for fraud. [Emphasis added]**

The final page of the applications required the applicant's digital signature.

³ In the version of this acknowledgment for applications 25392, 37830, and 42027, there was a comma after the word "read." The rest of this acknowledgment has been identical for all applications.

Community Services assigned applications it received to a Community Services reviewer. The reviewer checked whether the applicant submitted all required information and that there were no discrepancies within the documents. If information was missing, or if information in submitted documents was inconsistent, the reviewer would return the application to the applicant, noting what was missing or inconsistent. If the applicant met the eligibility guidelines and submitted required documentation, and the applicant's landlord had registered or was in the process of registering with the County as a vendor, the reviewer would send the application to a supervisor for review.

Then, applications were sent to Community Services fiscal personnel. Upon the approval of an application for rental assistance, the County sent notice of approval and a request for payment to the County Clerk and Comptroller's Office for payment processing.

The County Clerk and Comptroller's Office paid funds directly to the applicant's landlord. In order to be paid, the landlord had to register as a vendor with the County. If not already registered, the County sent the landlord a link to a portal to complete the vendor registration process.

Landlord's Company

Although Applicant listed Landlord as her landlord in applications No. 25392, 37830, and 42027, the identical Balance Statement attached to both applications No. 37830 and 42027 reflected the landlord's name as [REDACTED] ("Landlord's Company") and was signed electronically by Landlord. Landlord Company's Articles of Organization were filed with the Florida Secretary of State Division of Corporations on December 9, 2019, with Landlord listed as its Manager and Registered Agent and the address for the company as [REDACTED]. Similarly, the Annual Reports for Landlord's Company filed on March 23, 2020, March 22, 2021, and March 16, 2022 list Landlord as the Manager and Registered Agent, and the Annual Reports filed March 23, 2020 and, March 22, 2021 list the company's address as [REDACTED] FL 33404.

Landlord's 2nd Company

[REDACTED] ("Landlord's 2nd Company") Articles of Organization were filed with the Florida Secretary of State Division of Corporations on April 10, 2017, with Landlord listed as its Manager and Registered Agent. The business was administratively dissolved in September 2018 for failure to file an Annual Report. It was reinstated upon filing an Annual Report on June 27, 2020, with Landlord listed as the Manager and Applicant listed as "Authorized Agent." Annual reports filed on March 22, 2021 and March 16, 2022 also listed Landlord as the Manager and Applicant as Landlord's 2nd Company "Authorized Agent."


Property Records for Applicant’s Address

Applications No. 25392, 37830, and 42027 identified Applicant’s rental address as [REDACTED] Riviera Beach, FL.⁴ She listed the landlord’s address [REDACTED] in application No. 25392 and [REDACTED], Riviera Beach, FL in applications No. 37830 and 42027. The Palm Beach County Property Appraiser’s online database shows that Landlord has owned the property located at [REDACTED] Riviera Beach, FL 33404 since April 2003.


According to the Alternate Street Name List found on Palm Beach County’s website [REDACTED].

Landlord’s Food and Utility Assistance Application

The Landlord submitted Application # 44980 for food and utility assistance with the County on October 29, 2020 (the same day that Applicant submitted application No. 37830 for rental assistance) and listed the Applicant as her daughter.



OSCARSS APPLICATION: 44980



Household Details (Additional Household Members - Exclude Yourself)

First Name *	M.I.	Last Name *	DOB *	Race *	SSN *	Gender *	Education *
[REDACTED]						Female	9-12 Non Grad
[REDACTED]						Male	0-8

Relationship to Head of Household

Name *	Age	US Citizen/ Legal Alien *	Relationship *	Veteran	Ethnicity	Disabled
[REDACTED]			Self		Non-Hispanic/ Non-Latino	[REDACTED]
[REDACTED]			Daughter		Non-Hispanic/ Non-Latino	[REDACTED]
[REDACTED]			Son			[REDACTED]

ALLEGATIONS AND FINDINGS

Allegation (1):

The Applicant provided false information in her rental assistance applications, which resulted in improper grant funding from a County program.

⁴ Applicant spelled her street address as [REDACTED] in application 37830, but misspelled it as [REDACTED] in one section of applications 42027 and 25392. The Balance Statements and Lease Agreements attached to the three applications correctly spelled the street address as [REDACTED].

Governing Directives:

Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance application and program guidelines; Palm Beach County Emergency Rental Assistance Program (ERA-1 and ERA-2) application and program guidelines.

Finding:

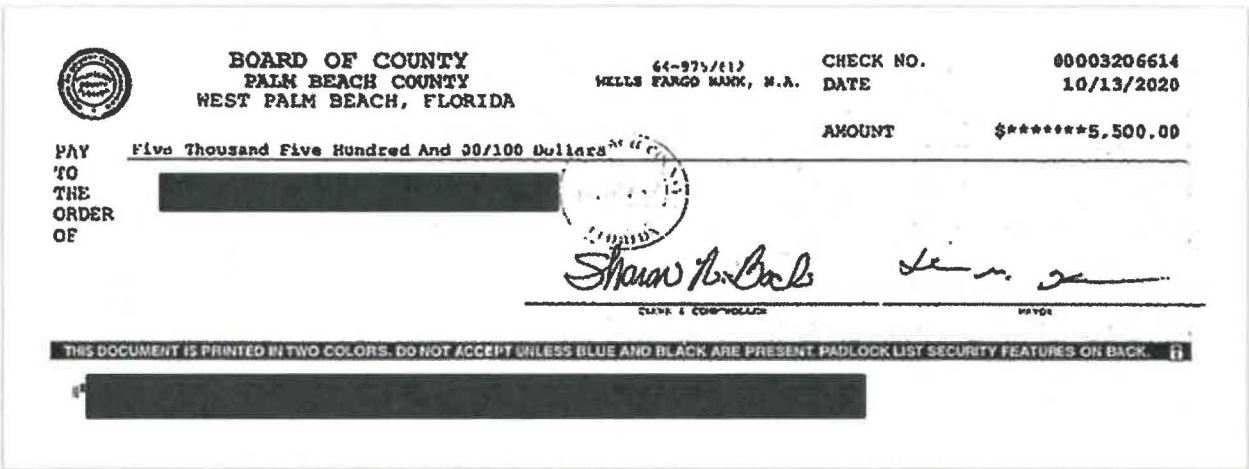
The information obtained **supports** the allegation.

Applicant’s First Rental Assistance Application

County records show Applicant electronically signed and submitted rental assistance application number 25392 to the County on August 31, 2020. Applicant listed her address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED], and her email address as [REDACTED]. She listed her landlord as [REDACTED] with an address of [REDACTED] and her monthly rent payment as \$1,100.00. She requested assistance for April through August, 2020, for a total of \$6,250.00, including late fees. Per the OSCARSS review log, a County supervisor processed the application on October 6, 2020.

Payment to Landlord

On October 13, 2020, the County issued check number 00003206614 in the amount of \$5,500.00⁶ to Landlord for Applicant’s rental assistance.



Applicant’s Second Rental Assistance Application

County records show Applicant electronically signed and submitted rental assistance application number 42027 to the County on October 14, 2020. Applicant listed her

⁵ Applicant inputted the social security number listed on the social security card attached to her application.


⁶ Community Services did not pay requested late fees. The Community Services reviewer did not justify the non-payment of late fees in the application review notes.

address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED]⁷, and again listed her email address as [REDACTED]. She listed her landlord as Landlord, with an address of "[REDACTED]" and her monthly rent payment as \$1,100.00.


Applicant requested assistance for September through November 2020, plus late fees, from April through November 2020, for a total of \$4,500.00. The County returned the application on October 19, 2020 and requested additional information, including income verification information and an explanation of how her loss of income was caused by COVID-19. Applicant resubmitted this application on October 30, 2020, and it was processed by a County supervisor on November 1, 2020.

The supporting documents Applicant submitted with this application included a Balance Statement dated October 28, 2020⁸, listing her landlord as Landlord's Company, and signed by Landlord. The Balance Statement indicated Applicant owed rent of \$1,100.00 per month for September, October, and November of 2020, plus late charges of \$150.00 per month from April 2020 through November 2020, for a total of \$4,500.00.

Applicant certified that all information she provided was accurate when she electronically



Balance Statement
(To be completed by Landlord/Property Manager)



Tenants Name (Print) [REDACTED]

Tenants Name (Print) [REDACTED]

Address: [REDACTED]
RIVIERA BEACH, FL 33404

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$4,500.00

Monthly arrears:

Example: Month <u>April 2011</u>	\$ <u>1000</u>	Late Charges	\$ <u>50</u>
Month <u>APRIL 2020</u>	\$ _____	Late Charges	\$ <u>150</u>
Month <u>MAY 2020</u>	\$ _____	Late Charges	\$ <u>150</u>
Month <u>JUNE 2020</u>	\$ _____	Late Charges	\$ <u>150</u>
Month <u>JULY 2020</u>	\$ _____	Late Charges	\$ <u>150</u>
Month <u>AUG 2020</u>	\$ _____	Late Charges	\$ <u>150</u>
SEPT 2020	\$1100.00		\$150
OCTOBER	\$1100.00		\$150
NOVEMBER	\$1100.00		\$150
Attorney Fees: \$ _____	0	Court Cost \$ _____	0

TENANT RELOCATED 10/28/2020 AND STILL OWES NOVEMBER'S RENT WHICH IS END OF LEASE.

[REDACTED] 10/28/2020

Landlord's Name (Print)
Signature
Date




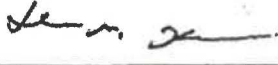

signed and submitted her application.

⁷ Applicant inputted the social security number listed on the social security card attached to her application.




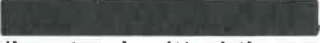
⁸ Applicant did not submit a Balance Statement with her initial application on October 14, 2020. The Balance Statement was requested after the application's submission.

Payment to Landlord

On December 17, 2020, the County issued check number 00003220139 in the amount of \$4,500.00 to Landlord for rental assistance.

	BOARD OF COUNTY COMMISSIONERS PALM BEACH COUNTY WEST PALM BEACH, FLORIDA	64-975/612 WELLS FARGO BANK, N.A.	CHECK NO. 00003220139 DATE 12/17/2020
	PAY TO THE ORDER OF	Four thousand Five Hundred And 00/100 Dollars	AMOUNT \$*****4,500.00
		 <small>CLERK & COMPTROLLER</small>	 <small>TREASURER</small>
THIS DOCUMENT IS PRINTED IN TWO COLORS. DO NOT ACCEPT UNLESS BLUE AND BLACK ARE PRESENT. PADLOCK LIST SECURITY FEATURES ON BACK.			
			

Applicant's Third Rental Assistance Application

County records show that on October 29, 2020, the day before she resubmitted application number 42027, Applicant electronically signed and submitted rental assistance application number 37830 to the County. Applicant listed her address as  Riviera Beach, FL, incorrectly manually input her social security number as ⁹ [emphasis added], and for the first time listed her email address as . ***This social security number and email address were different from those she used on her prior two applications.*** She listed her landlord as Landlord, with an address of "" and her monthly rent payment as \$1,100.00. It appears that Applicant submitted the same Balance Statement that she had attached to application 42027 when she requested assistance for September through November 2020, plus late fees from April through November 2020, for a total of \$4,500.00. Applicant also requested food assistance on this application. The application was processed by a County supervisor on November 1, 2020.

⁹ Applicant attached the same social security card she had submitted with applications No. 42027 and 25392.



Balance Statement
(To be completed by Landlord/Property Manager)



Tenants Name (Print)

Tenants Name (Print)

Address: RIVIERA BEACH, FL 33404

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$4,500.00

Monthly arrears:

Example: Month	April 2011	\$ 1000	Late Charges	\$50
Month	APRIL 2020	\$	Late Charges	\$150
Month	MAY 2020	\$	Late Charges	\$150
Month	JUNE 2020	\$	Late Charges	\$150
Month	JULY 2020	\$	Late Charges	\$150
Month	AUG 2020	\$	Late Charges	\$150
	SEPT 2020	\$1100.00		\$150
	OCTOBER	\$1100.00		\$150
	NOVEMBER	\$1100.00		\$150
Attorney Fees: \$	0		Court Cost \$	0


TENANT RELOCATED 10/28/2020 AND STILL OWES NOVEMBER'S RENT WHICH IS END OF LEASE.

Landlords Name (Print) Signature Date 10/28/2020

Applicant certified that all information she provided was accurate when she electronically signed and submitted her application.

Payment to Landlord

On November 12, 2020, the County issued check number 00003211946 in the amount of \$4,500.00 to Landlord for Applicant's rental assistance.


	BOARD OF COUNTY PALM BEACH COUNTY WEST PALM BEACH, FLORIDA	64-975/612 WELLS FARGO BANK, N.A.	CHECK NO. DATE	00003211946 11/12/2020
			AMOUNT	\$*****4,500.00

PAY Four Thousand Five Hundred And 00/100 Dollars

TO THE ORDER OF [REDACTED]

Sharon A. Cook *[Signature]*

CLERK & COMPTROLLER PAYEE

THIS DOCUMENT IS PRINTED IN TWO COLORS. DO NOT ACCEPT UNLESS BLUE AND BLACK ARE PRESENT. PADLOCK LIST SECURITY FEATURES ON BACK. 

[REDACTED]

Applicant's Fourth Rental Assistance Application

After Community Services submitted its complaint to the OIG, Applicant electronically signed and submitted a fourth rental assistance application number 71325 to the County on April 1, 2021. Applicant manually input her address as [REDACTED] West Palm Beach, FL, her social security number as [REDACTED]¹⁰, and her email address as [REDACTED]. She listed her landlord as "Fauda A", and requested rental assistance of \$8,431.00 for the months of February through July 2021. She also requested utility assistance of \$240.00. On July 9, 2021, the County sent Applicant an email stating her application had been denied "because your previous landlord was overpaid using CARES funds from your last applications."

¹⁰ Applicant attached the same social security card she had submitted with her prior applications.

Process Service Eligibility

Application #71325 for [REDACTED] (Email: [REDACTED])
App. Date: 05/22/2021)

Routing Log Personal Details Docs App Notes

First Name: [REDACTED]
Homeless:
Middle Initial:
Residential Address: [REDACTED] WEST PALM BEACH FL 33401
Last Name:
Mailing Address: [REDACTED] WEST PALM BEACH FL 33401
Date of Birth: 11/20/1997
Home Phone: [REDACTED]
Race: Black or African American
Cell Phone: [REDACTED]
Gender: Female
SSN: [REDACTED]

Applicant's Fifth Rental Assistance Application

Applicant electronically signed and submitted a fifth rental assistance application number 154457 to the County on September 8, 2022. Applicant listed her address as [REDACTED], [REDACTED] Riviera Beach, FL, and again manually inputted her social security number as [REDACTED]¹¹, and her email address as [REDACTED]. She listed her landlord as [REDACTED] and requested rental assistance of \$9,362.00 for the months of June through October, 2022. On September 20, 2022, the County returned the application for additional information, including verification of assistance from the State of Florida, proof of income, bank statements, proof of food stamp benefits, and proof of COVID crisis. Applicant resubmitted this application on September 30, 2022. On October 9, 2022, the County returned the application with a request for additional information, including full bank statements and verification of SNAP benefits, if any. Applicant resubmitted the application on October 18, 2022. On October 21, 2022, the County again returned the application for full bank statements and verification of SNAP benefits. Applicant resubmitted the application on October 25, 2022. The County returned the application to her on that same date for additional documentation for proof of COVID

¹¹ Applicant attached the same social security card she had submitted with her prior applications.

crisis. Applicant resubmitted the application on November 3, 2022. On November 17, 2022, the County again returned the application for documentation of proof of COVID crisis. Applicant resubmitted the application on November 18, 2022. The County returned the application to her on December 7, 2022 for additional documentation. Applicant resubmitted the application on December 12, 2022. The County denied this application.

Applicant's Sixth Rental Assistance Application

Applicant electronically signed and submitted a sixth rental assistance application number 172338 to the County on December 15, 2022. Applicant listed her address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED] and her email address as [REDACTED]. She listed her landlord as [REDACTED] and

Process Service Eligibility

Palm Beach County
COMMUNITY SERVICES

Application #154457 for [REDACTED]
[REDACTED]
App. Date: 11/03/2022)

Routing Log Personal Details App History Docs App Notes

First Name: [REDACTED]
Homeless:
Middle Initial:
Residential Address: [REDACTED]
Last Name: [REDACTED]
Mailing Address: [REDACTED]
Date of Birth: [REDACTED]
Home Phone: [REDACTED]
Race: **Black or African American**
Cell Phone: [REDACTED]
Gender: **Female**
SSN: [REDACTED]

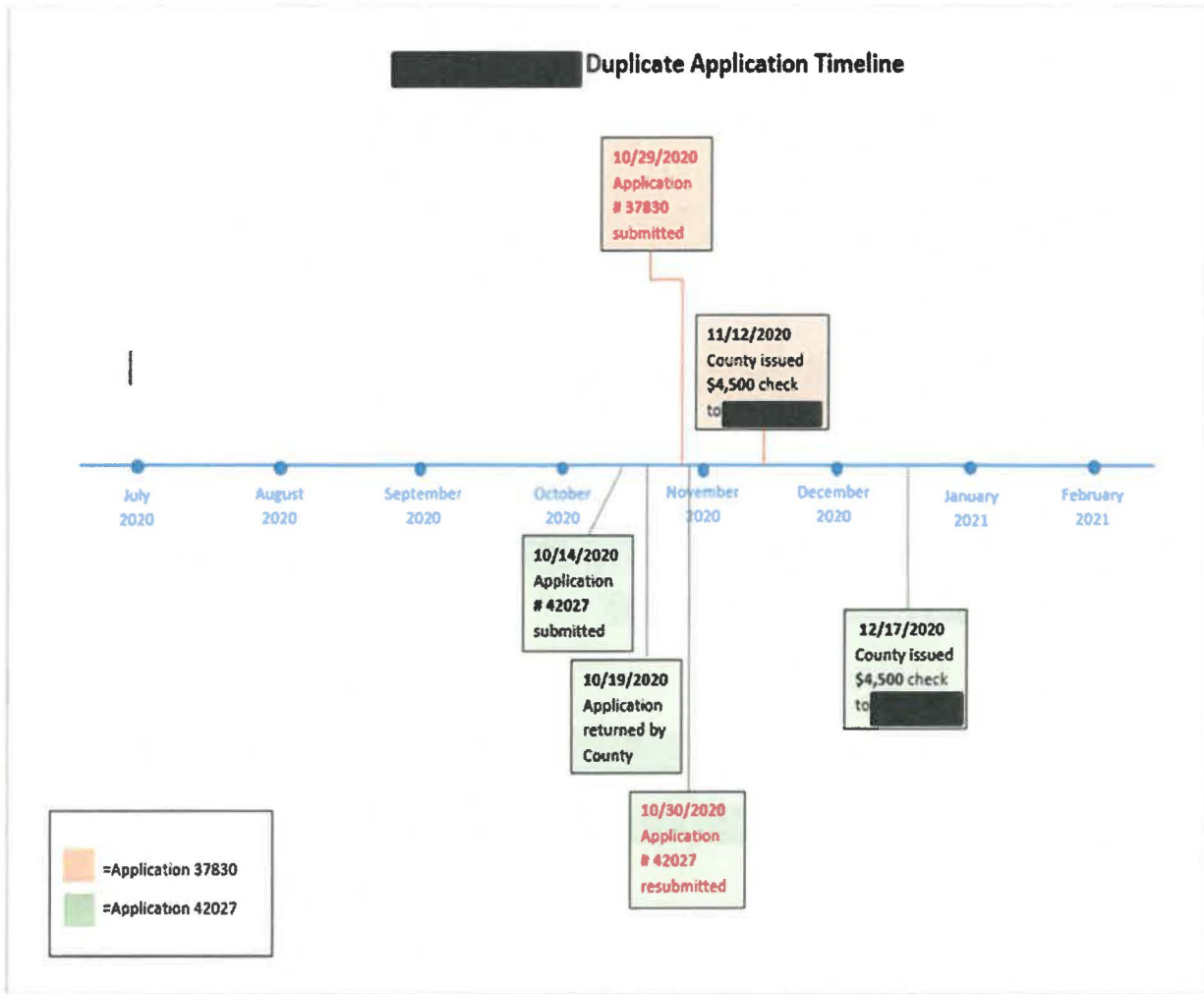
requested rental assistance of \$12,250.00 for the months of June through December 2022.¹²

The screenshot shows a web application interface for 'Process Service Eligibility'. At the top, there is a header with the title and a logo for Palm Beach County Community Services. Below the header, the application number #172338 is displayed, along with the applicant's name (redacted) and the application date of 12/15/2022. A navigation bar includes links for 'Rental Log', 'App History', 'Docs', and 'App Notes'. The main section is titled 'Personal Details' and contains the following information:

First Name:	[Redacted]	Homeless:	
Middle Initial:		Residential Address:	[Redacted]
Last Name:	[Redacted]		
Date of Birth:	[Redacted]		
Race:	Black or African American	Cell Phone:	[Redacted]
Gender:	Female		[Redacted]
Marital Status:	Single	Ethnicity(Hispanic):	Non-Hispanic/Non-Latino
Migrant Worker:	No	Family Type:	Other
Education Level:	HS Grad/GED	Housing Type:	
Primary Language:	English	Undocumented:	No
Veteran:	No	Disabled:	
Orientation:		Pregnancy Status:	

¹² This application is currently under review by Community Services.

The OIG’s review of the relevant facts established the following timeline¹³:



OIG Interview of Community Services Reviewer Shavita Littles

Community Services Reviewer Shavita Littles told the OIG that the OSCARSS system generates applications and differentiates them by comparing the client’s email address and Social Security number (SSN) to previously filed applications. In order to log into the system, applicants use their email address. If multiple email addresses are used by the same person, the system would create an entirely new account for each email address and treat that account as a different person, provided the applicant also used a different SSN.

Ms. Littles stated that the system did not recognize Applicant’s duplicate requests for applications 42027 and 37830 because Applicant used the email address [redacted] and SSN ending in [redacted] for application 42027, and used the email address [redacted] and the SSN ending in [redacted] for application

¹³ Applications 42027 and 37830 both ask for Rental Assistance for the duplicate/overlapping months of September 2020 through December 2020.

37830. Ms. Littles said that had Applicant used the same email address, the system would have detected the inconsistent social security numbers in the two applications and would not have allowed her to put another application through the system. However, because she used a different email address in application 37830, the system generated a new account and application number.

OIG Interview of CSD Director of Finance Julie Dowe

Ms. Dowe stated that if the same Social Security number was used in multiple applications, regardless of what email address (and therefore account) was used to submit the applications, the OSCARSS system would have caught it.

Interview of Landlord

The Landlord told the OIG that she owns the property located at [REDACTED] [REDACTED] Riviera Beach, FL. During the year 2020, she rented part of that property to Applicant. Landlord stated that she knows Applicant personally, but when asked, she refused to specify how.

The OIG showed the Landlord a copy of the lease that was submitted to Community Services with Applicant’s rental assistance applications, and the Landlord confirmed it was authentic. The Landlord knew that Applicant applied for rental assistance with the County and stated that Applicant was behind on rent. The OIG showed the Landlord a copy of the Balance Statement dated October 28, 2020 that was submitted to Community Services with Applicant’s rental assistance applications, and the Landlord confirmed she filled it out.

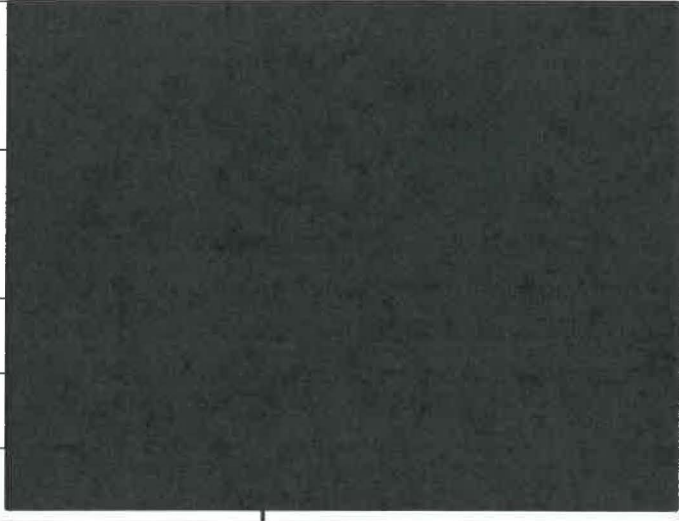
The Landlord confirmed receipt of all three checks from the County for rental assistance on behalf of Applicant. She said she was willing to pay back overpayments of rental assistance.

Interview of Applicant

The OIG telephonically contacted Applicant to schedule an interview. Applicant stated she had only one application for the [REDACTED] address, and if there was an issue or Community Services saw something wrong with her application, they should have denied it. She thereafter declined to be further interviewed.

OIG Analysis and Conclusion

Applicant Application Summary			
Application Number	Assistance Months Requested	Social Security Number Submitted	Email Address Submitted
25392	4/2020 through 8/2020	[REDACTED]	[REDACTED]

42027	9/2020 through 11/2020 with late fees 4/2020 through 11/2020	
37830	9/2020 through 11/2020 with late fees 4/2020 through 11/2020	
71325	2/2021 through 7/2021	
154457	6/2022 through 10/2022	
172338	6/2022 through 12/2022	

Applicant initially submitted rental assistance application 42027 on October 14, 2020. That application was returned for additional information on October 19, 2020. Applicant then submitted rental assistance application number 37830 on October 29, 2020, using a different email address and social security number, but requesting assistance for the same period as application number 42027. She then re-submitted application 42027, using the initial email address and social security number, on October 30, 2020, just one day later. The supporting documents Applicant submitted with both of these applications included the same Balance Statement dated October 28, 2020, signed by the Landlord. In her own, separate rental assistance application to the County, the Landlord stated that Applicant was her daughter.

Because Applicant created two different accounts by using different email addresses, and providing an inaccurate Social Security number when creating one of those accounts, the County issued two checks for assistance to cover rent and late fees for the same time period. Application 37830 would not have been submitted to a reviewer for approval had Applicant used accurate information. At the time of Applicant's duplicate applications, Community Services did not have processes in place to identify duplicates.

The County issued separate payments of \$4,500.00 for the same time period, for applications 37830 and 42027. The overpayment from the County totaled \$4,500.00 in Identified Costs. Applicant also submitted two additional applications using the same inaccurate Social Security number in unsuccessful attempts to obtain assistance. Our office noticed that Applicant always coupled a Gmail email address with the incorrect social security number in her applications and always used a yahoo email address with her correct social security number, suggesting that the discrepancy was not inadvertent or a keyboarding error when inputting data into the system. Moreover, this overpayment was received by the Landlord, who stated in her own food and utility assistance application that Applicant was her daughter. Additionally, Applicant serves as an authorized agent of a business the Landlord manages.

The allegation is **supported**.

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Identified Costs: \$4,500.00

ACKNOWLEDGEMENT

The Inspector General's Investigations Division would like to thank the Palm Beach County Community Services Department staff for their cooperation throughout this investigation.

RECOMMENDED CORRECTIVE ACTIONS

We make one recommendation; that the County seeks reimbursement of \$4,500 in issued funds.

RESPONSE FROM MANAGEMENT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, the County was provided the opportunity to submit a written explanation or rebuttal to the findings as stated in this Investigative Report within ten (10) calendar days. Their written responses is:

The County concurs with the IG recommendation included in Investigative Report 2021-0016. The Community Services Department will seek reimbursement of the \$4,500 issued to the subject named in this investigation.

RESPONSE FROM SUBJECT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Applicant was provided the opportunity to submit a written explanation or rebuttal to the finding as stated in the Investigative Report within ten (10) calendar days. The Applicant's response is included as Attachment 'A'.

ATTACHMENT A

In reference to Investigative Report 2021-0016, Inaccurate Information on Riviera Beach CARES Act Rental Assistance Application February XX, 2023 John A. Carey Inspector General OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY INVESTIGATIVE REPORT 2021-0016 DATE ISSUED: FEBRUARY XX, 2023 Inspector, This document is being presented a response in accordance with the Palm Beach County Inspector General Ordinance, Article XII, Section 2-427. Pursuant to § 119.0713(2) and § 112.3188, Florida Statutes,

I am [REDACTED] of Riviera Beach, and replying to the draft of this investigation. I did apply for rental assistance with palm beach county in 2020 during the pandemic. I have composed this rebuttal to show nothing that I did or [REDACTED] had no fraudulent intent to it.

I moved from Miami I have provided proof of mail and bank statements attached) and needed somewhere to live when I decided to come back to Palm Beach County.

I lost my job and asked my mother, [REDACTED], if I could move into her home where she still conducts business, has lights and water on still since she relocated but till ran her business there since she could not where she was. She agreed but only if I pay rent and was the only place that I could with little money.

She gave me leniency for the first couple of month and then the pandemic it and it was harder for me to get work.

I applied for rental assistance because it seemed like a solution to my issue. I sent it to [REDACTED] (my mother) and she electronically signed in and what appears to be an issue that it came back on the document signed with her Business name attached. I was just an clerical error, when she conducts business it is part of a layout with her signature I'm sure. She simply didn't see it nor did I catch it when it was sent back. I do not understand what her business has to do with the investigation or the location of her business. I rented a room and owed money and found a means to pay it. If any other person who lived there owed rent, they would have to pay. What is the issue that this is my mother. We were estranged for a couple of years and she allowed me to move into her house under conditions and held me to my obligations and now she and I under investigation. If any other person lived there, this would not be an issue. to I submitted all of the required documentation including my social security number and card. I am the one who caught a inconsistency with my social security and called the county to get it corrected. The County were the ones who suggested that I use a different email address because my information is attached to that email and that social security number and only IT can change the discrepancy and had not up until that point. Even after I put in a request into the county portal. According to the records that is provided in this investigation, that check was paid months prior to me finding out that there was a "one digit" typo in my social security number and has nothing to do with multiple checks being issued. The investigation seem to imply that I was using several numbers & not that it was a digit off and I am not sure I made the error but did provide my Social Security Card and should have been verified. It was an error on the county and has hindered me for receiving assistance to help me stay housed and received the help that I was entitled to. Instead of that being addressed or accepting the reimbursement that [REDACTED] stated that she would give back if she was not entitled to, I am being portrayed as a person committing fraud when there is none. This was just me looking for

assistance, there was an overpayment and a witch hunt pursued which resulted in me having to move several times when I could have actually qualified for the program.

The county had spoken to [REDACTED] and myself over a year and a half ago and notified her that she had been over paid. Although the amount received was close to what was being requested. When she discussed the matter, and was told that she was over paid she agreed to pay it back a year and a half ago but the county chose for do an investigation. Which ends up being the same result that the county was looking for. This matter seems personal and that there is a conflict of interest in the office, that is how this came up. It doesn't have any bearings because I will provided documentation and address the "findings",

[REDACTED] did not live there, she had a separate address under her emergency circumstances and could not live there. She did plan to move back at some point but had to move under emergency circumstance and continued to run her business there. While there, being that I was now living there, to address some of her customers and receive documents, she then added me as an agent to protect herself and give me authorization to receive certain things. I have not been an agent prior or since I moved. As noted in this draft, her business has been in business since 2017 and the second business has been going prior to the pandemic and both business are still current with the Department of State and for over a year, has a brick and mortar site but no one addressed this and implying she is not a fly by night or created a business for any illegal purposes, she's been in business, conducts proper business and is a productive citizen. I'm not sure why her businesses are being scrutinized and smeared in this report. She has done nothing wrong but provide a place for me to live.

Again, I provide attached documentation to support what I am saying. I also did not live there for long prior to me applying for rental assistance and when I was all paid up, I moved to [REDACTED] West Palm Beach. I attached my lease and you can call and verify. I needed further assistance while living there because I lost my source of income again and applied for rental assistance, to no avail. I ended up moving again because the assistance never came, I was further having issues with stable work due to the pandemic and I was getting the run around with rental assistance. I was informed that there was an over payment much later when I had to move but the money didn't come to me, it went to [REDACTED]. How was that my fault?

In reference to Investigative Report 2021-0016 Inaccurate Information on Riviera Beach CARES Act Rental Assistance Application February XX, 2023 John A. Carey Inspector General OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY INVESTIGATIVE REPORT 2021-0016 DATE ISSUED: FEBRUARY XX, 2023 Inspector General Accredited "Enhancing Public Trust in Government" This document is being presented for your response in accordance with the Palm Beach County Inspector General Ordinance, Article XII, Section 2-427. Pursuant to § 119.0713(2) and § 112.3188, Florida Statutes, this draft document is confidential and exempt from disclosure until our audit, investigation, or review is complete and our audit, review, or investigative report becomes final. Pursuant to § 119.10(2)(a), Florida Statutes, any person who willfully and knowingly violates any provision of Chapter 119, Florida Statutes, commits a misdemeanor of the first degree, punishable by a term of imprisonment of up to one year and a fine of up to \$1,000. If you receive a request to inspect or copy this draft document after we issue a Final Report stamped "Redacted", you should contact the Palm Beach County Office of Inspector General prior to the release of this draft document, or any portion thereof, as it may contain material that must be redacted in accordance with Chapter 119, Florida Statutes, or other applicable state or federal laws.

INACCURATE INFORMATION ON RIVIERA BEACH CARES ACT RENTAL ASSISTANCE APPLICATION SUMMARY WHAT WE DID

The Palm Beach County (County) Office of Inspector General (OIG) received a complaint from the Palm Beach County Community Services Department (Community Services) concerning [REDACTED] applications to the County Coronavirus Aid, Relief, and Economic Security (CARES) Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program (Program). Community Services alleged that [REDACTED] submitted rental assistance applications (No. 25392, 37830, and 42027) for the same location after creating two separate application accounts using different email addresses and social security numbers. [REDACTED] submitted applications No. 37830 and 42027 within two days of each other requesting the same amount of rental assistance for the same address¹ and for the same period of time, but providing different social security numbers and email addresses for herself.

[REDACTED] spelled her street address as "[REDACTED]" in application 37830, but misspelled it as [REDACTED] in one section of application 42027.

The address is [REDACTED] and it also comes up [REDACTED] for years. Some areas do not accept one or the other. I am unsure of the bearing in this investigation.

According to Community Services, the duplicative submissions resulted in [REDACTED] receiving rental assistance that "exceeded the cap" by \$4,500.00.

This error was on the county's behalf and had nothing to do with any thing I have done. As stated, there had been one check and additional assistance requested and another was sent. This is a county action. This is a third check that was sent in the same amount.

The complaint further noted that applications 37830 and 42027 listed the same address for [REDACTED] and her landlord. Based upon our initial review of [REDACTED] applications and accompanying documents, the OIG initiated an investigation of the following allegation: Allegation (1): [REDACTED] provided inaccurate information in her rental assistance applications, which resulted in improper grant funding from a County program. Everything I provided was accurate according to what I provided. A different letter in the street address or a digit in the social security number does not constitute anything improperly done on my behalf and should not have resulted in an over payment or needed an investigation.

During the course of our investigation, [REDACTED] submitted three additional rental assistance applications (No. 7132, 172338, and 154457), which were denied.

I applied, I lived at another address, had to moved to [REDACTED] and now live in my current address where I was also requesting assistance. In have been denied for reasons beyond my control and what seems to be typographical errors. When addressed, could have been rectified almost two years ago.

We also interviewed Community Services personnel, [REDACTED] landlord, and attempted to interview [REDACTED] WHAT WE FOUND Allegation (1) is supported. We found that [REDACTED] submitted inaccurate information to the County on her rental assistance applications. As a result of her actions, the County approved [REDACTED] rental assistance applications dated October 29, 2020 and October 30, 2020, and issued duplicate payments of \$4,500.00 to her landlord, [REDACTED].

I again have responded to this duplication.

The inappropriate payment resulted in Identified Costs² of \$4,500.00. WHAT WE RECOMMEND We make one recommendation; that the County seeks reimbursement of \$4,500 in issued funds.

asked what does she need to do a year and a half ago and was willing to write the check then and the county declined. They wanted to further investigate.

² Identified costs are costs that have been identified as dollars that have the potential of being returned to the entity to offset the taxpayers' burden.

The county and the investigator(s) caused this cost because and stated in this report, the funds could have been returned right away. Instead, this method was used and cost the taxpayers money.

. If information was missing, or if information in submitted documents was inconsistent, the reviewer would return the application to the applicant, noting what was missing or inconsistent. If the applicant met the eligibility guidelines and submitted required documentation, and the applicant's landlord had registered or was in the process of registering with the County as a vendor, the reviewer would send the application to a supervisor for review. Then, applications were sent to Community Services fiscal personnel. Upon the approval of an application for rental assistance, the County sent notice of approval and a request for payment to the County Clerk and Comptroller's Office for payment processing. The County Clerk and Comptroller's Office paid funds directly to the applicant's landlord. In order to be paid, the landlord had to register as a vendor with the County. If not already registered, the County sent the landlord a link to a portal to complete the vendor registration process. Although listed as her landlord in applications No. 25392, 37830, and 42027, the identical Balance Statement attached to both applications No. 37830 and 42027 reflected the landlord's name as and was signed electronically by

Articles of Organization 3 In the version of this acknowledgment for applications 25392, 37830, and 42027, there was a comma after the word "read." The rest of this acknowledgment has been identical for all applications. Similarly, the Annual Reports for filed on March 23, 2020, March 22, 2021, and March 16, 2022 list as the Manager and Registered Agent, and the Annual Reports filed March 23, 2020 and, March 22, 2021 list the company's address as , Riviera Beach, FL 33404. Articles of Organization were filed with the Florida Secretary of State Division of Corporations on April 10, 2017, with listed as its Manager and Registered Agent. The business was administratively dissolved in September 2018 for failure to file an Annual Report. It was reinstated upon filing an Annual Report on June 27, 2020, with listed as the Manager and listed as "Authorized Agent." Annual reports filed on March 22, 2021 and March 16, 2022 also listed as the Manager and "Authorized Agent." Property Records for Riviera Beach, FL 33404 Applications No. 25392, 37830, and 42027 identified Riviera Beach, FL.4 She listed the landlord's address as in application No. 25392 and Riviera Beach, FL in applications No. 37830 and 42027. The Palm Beach County Property Appraiser's online database shows that has owned the property located at ,

Riviera Beach, FL 33404 since April 2003. According to the Alternate Street Name List found on Palm Beach County's website, [REDACTED] is also known as [REDACTED]

This was addressed above. The street is known as [REDACTED] Not all system take any changes.

[REDACTED] Food and Utility Assistance Application [REDACTED] submitted Application # 44980 for food and utility assistance with the County on October 29, 2020 (the same day that [REDACTED] submitted application No. 4 [REDACTED] spelled her street address as "[REDACTED]" in application 37830, but misspelled it as [REDACTED] in one section of applications 42027 and 25392. The Balance Statements and Lease Agreements attached to the three applications correctly spelled the street address as [REDACTED] am unsure of what [REDACTED] has on her applications

(37830 for rental assistance) and listed [REDACTED] as her daughter. ALLEGATIONS AND FINDINGS Allegation (1): [REDACTED] provided false information in her rental assistance applications, which resulted in improper grant funding from a County program. Governing Directives: Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance application and program guidelines; Palm Beach County Emergency Rental Assistance Program (ERA-1 and ERA-2) application and program guidelines. Finding: The information obtained supports the allegation. [REDACTED] First Rental Assistance Application County records show [REDACTED] electronically signed and submitted rental assistance application number 25392 to the County on August 31, 2020 [REDACTED] listed her address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED], and her email address as [REDACTED]. She listed her landlord as "[REDACTED]" with an address of [REDACTED] and her monthly rent payment as \$1,100.00. She requested assistance for April through August, 2020, for a total of \$6,250.00, including late fees. Per the OSCARSS review log, a County supervisor processed the application on October 6, 2020. Payment to [REDACTED]. On October 13, 2020, the County issued check number 00003206614 in the amount of \$5,500.006 to [REDACTED] for [REDACTED] rental assistance. [REDACTED] Second Rental Assistance Application County records show [REDACTED] electronically signed and submitted rental assistance application number 42027 to the County on October 14, 2020 [REDACTED] listed her address as [REDACTED], Riviera Beach, FL, her social security number as [REDACTED] and again listed her email address as [REDACTED]. She listed her landlord as [REDACTED], with an address of [REDACTED] and her monthly rent payment as \$1,100.00. 5 [REDACTED] inputted the social security number listed on the social security card attached to her application.

6 Community Services did not pay requested late fees. The Community Services reviewer did not justify the nonpayment of late fees in the application review notes. Unsure of what to address.

[REDACTED] inputted the social security number listed on the social security card attached to her application. Typos in the submission on some level. Social security card was provided.

[REDACTED] requested assistance for September through November 2020, plus late fees, from April through November 2020, for a total of \$4,500.00. The County returned the application on October 19, 2020 and requested additional information, including income verification information and an explanation of how her loss of income was caused by COVID-19. [REDACTED] resubmitted this application

on October 30, 2020, and it was processed by a County supervisor on November 1, 2020. The supporting documents submitted with this application included a Balance Statement dated October 28, 2020, listing her landlord as [REDACTED]. The Balance Statement indicated [REDACTED] paid rent of \$1,100.00 per month for September, October, and November of 2020, plus late charges of \$150.00 per month from April 2020 through November 2020, for a total of \$4,500.00. [REDACTED] did not submit a Balance Statement with her initial application on October 14, 2020.

[REDACTED] certified that all information she provided was accurate when she electronically signed and submitted her application. Payment to [REDACTED] On December 17, 2020, the County issued check number 00003220139 in the amount of \$4,500.00 to [REDACTED] for rental assistance. [REDACTED] Third Rental Assistance Application County records show that on October 29, 2020, the day before she resubmitted application number 42027, [REDACTED] electronically signed and submitted rental assistance application number 37830 to the County. [REDACTED] listed her address as [REDACTED] Beach, FL, incorrectly manually input her social security number as [REDACTED] [REDACTED] emphasis added], and for the first time listed her email address as [REDACTED]. This social security number and email address were different from those she used on her prior two applications. She listed her landlord as [REDACTED], with an address of "[REDACTED]" and her monthly rent payment as \$1,100.00. It appears that [REDACTED] submitted the same Balance Statement that she had attached to application 42027 when she requested assistance for September through November 2020, plus late fees from April through November 2020, for a total of \$4,500.00. [REDACTED] also requested food assistance on this application. The application was processed by a County supervisor on November 1, 2020. [REDACTED] 9 [REDACTED] attached the same social security card she had submitted with applications No. 42027 and 25392.

This is the same information that proves my point that there was ill intent. SS card was provided both times.

[REDACTED] certified that all information she provided was accurate when she electronically signed and submitted her application. Payment to [REDACTED] On November 12, 2020, the County issued check number 00003211946 in the amount of \$4,500.00 to [REDACTED] for [REDACTED] rental assistance.

[REDACTED] electronically signed and submitted a fourth rental assistance application number 71325 to the County on April 1, 2021. [REDACTED] manually input her address as [REDACTED] West Palm Beach, FL, her social security number as [REDACTED] and her email address as [REDACTED]. She listed her landlord as "Fauda A", and requested rental assistance of \$8,431.00 for the months of February through July 2021. She also requested utility assistance of \$240.00. On July 9, 2021, the County sent [REDACTED] an email stating her application had been denied "because your previous landlord was overpaid using CARES funds from your last applications." [REDACTED] 10 [REDACTED] attached the same social security card she had submitted with her prior applications.

I moved again by then.

[REDACTED] Fifth Rental Assistance Application [REDACTED] electronically signed and submitted a fifth rental assistance application number 154457 to the County on September 8, 2022. [REDACTED] listed her address as [REDACTED] Riviera Beach, FL, and again manually inputted her social security number as [REDACTED] and her email address [REDACTED]. She listed her landlord as Thadeaus Sims and requested rental assistance of \$9,362.00 for the months of June through October,

2022. On September 20, 2022, the County returned the application for additional information, including verification of assistance from the State of Florida, proof of income, bank statements, proof of food stamp benefits, and proof of COVID crisis. [REDACTED] resubmitted this application on September 30, 2022. On October 9, 2022, the County returned the application with a request for additional information, including full bank statements and verification of SNAP benefits, if any. [REDACTED] resubmitted the application on October 18, 2022. On October 21, 2022, the 11 [REDACTED] attached the same social security card she had submitted with her prior applications

County again returned the application for full bank statements and verification of SNAP benefits. [REDACTED] resubmitted the application on October 25, 2022. The County returned the application to her on that same date for additional documentation for proof of COVID crisis. [REDACTED] resubmitted the application on November 3, 2022. On November 17, 2022, the County again returned the application for documentation of proof of COVID crisis. [REDACTED] resubmitted the application on November 18, 2022. The County returned the application to her on December 7, 2022 for additional documentation. [REDACTED] resubmitted the application on December 12, 2022. The County denied this application. [REDACTED] Sixth Rental Assistance Application [REDACTED] electronically signed and submitted a sixth rental assistance application number 172338 to the County on December 15, 2022. [REDACTED] listed her address as [REDACTED] and her email address as [REDACTED]. She listed her landlord as Thaddaeus Sims, and requested rental assistance of \$12,250.00 for the months of June through December 2022.12 12 This application is currently under review by Community Services.

The OIG's review of the relevant facts established the following timeline¹³: OIG Interview of Community Services Reviewer Shavita Little's Community Services Reviewer Shavita Little's told the OIG that the OSCARSS system generates applications and differentiates them by comparing the client's email address and Social Security number (SSN) to previously filed applications. In order to log into the system, applicants use their email address. If multiple email addresses are used by the same person, the system would create an entirely new account for each email address 13 Applications 42027 and 37830 both ask for Rental Assistance for the duplicate/overlapping months of September 2020 through December 2020.

Ms. Little's stated that the system did not recognize [REDACTED] duplicate requests for applications 42027 and 37830 because [REDACTED] used the email address [REDACTED] and SSN ending in [REDACTED] for application 42027, and used the email address [REDACTED] and the SSN ending in [REDACTED] for application 37830. Ms. Little's said that had [REDACTED] used the same email address, the system would have detected the inconsistent social security numbers in the two applications and would not have allowed her to put another application through the system. However, because she used a different email address in application 37830, the system generated a new account and application number. OIG Interview of CSD Director of Finance Julie Dowe Ms. Dowe stated that if the same Social Security number was used in multiple applications, regardless of what email address (and therefore account) was used to submit the applications, the OSCARSS system would have caught it. Interview of [REDACTED] told the OIG that she owns the property located at [REDACTED] Riviera Beach, FL. During the year 2020, she rented part of that property to [REDACTED] [REDACTED] stated that she knows [REDACTED] personally, but when asked, she refused to specify how. The OIG showed [REDACTED] a copy of the lease that was submitted to Community Services with [REDACTED]

████████ rental assistance applications, and █████████ confirmed it was authentic. █████████ knew that █████████ applied for rental assistance with the County and stated that █████████ was behind on rent. The OIG showed █████████ a copy of the Balance Statement dated October 28, 2020 that was submitted to Community Services with █████████ rental assistance applications, and █████████ confirmed she filled it out. █████████ confirmed receipt of all three checks from the County for rental assistance on behalf of █████████. She said she was willing to pay back overpayments of rental assistance.

Interview of █████████ The OIG telephonically contacted █████████ to schedule an interview. █████████ stated she had only one application for the █████████ address, and if there was an issue or Community Services saw something wrong with her application, they should have denied it. She thereafter declined to be further interviewed. OIG Analysis and Conclusion █████████ Application Summary Application Number Assistance Months Requested Social Security Number Submitted Email Address Submitted 25392 4/2020 through 8/2020 █████████ 42027 9/2020 through 11/2020 with late fees 4/2020 through 11/2020 █████████ 37830 9/2020 through 11/2020 with late fees 4/2020 through 11/2020 █████████ 71325 2/2021 through 7/2021 █████████ 154457 6/2022 through 10/2022 █████████ 172338 6/2022 through 12/2022 █████████ initially submitted rental assistance application 42027 on October 14, 2020. That application was returned for additional information on October 19, 2020. █████████ then submitted rental assistance application number 37830 on October 29, 2020, using a different email address and social security number, but requesting assistance for the same period as application number 42027. She then re-submitted application 42027, using the initial email address and social security number, on October 30, 2020, just one day later. The supporting documents █████████ submitted with both of these applications included the same Balance Statement dated October 28, 2020, signed by █████████.

***** Unsure of what needs to be addressed, these are internal systems and have no bearing on the applicant.

In her own, separate rental assistance application to the County, █████████ stated that █████████ was her daughter. Because █████████ created two different accounts by using different email addresses, and providing an inaccurate Social Security number when creating one of those accounts, the County issued two checks for assistance to cover rent and late fees for the same time period. Application 37830 would not have been submitted to a reviewer for approval had █████████ used accurate information.

Duplicated

At the time of █████████ duplicate applications, Community Services did not have processes in place to identify duplicates.¹⁴ The County issued separate payments of \$4,500.00 for the same time period, for applications 37830 and 42027. The overpayment from the County totaled \$4,500.00 in Identified Costs. █████████ also submitted two additional applications using the same inaccurate Social Security number in unsuccessful attempts to obtain assistance. Our office noticed that █████████ always coupled a Gmail email address with the incorrect social security number in her applications and always used a yahoo email address with her correct social security, suggesting that the discrepancy was not inadvertent or a keyboarding error when inputting data into the system. Moreover, this overpayment

was received by [REDACTED] who stated in her own food and utility assistance application that [REDACTED] was her daughter. Additionally, [REDACTED] serves as an authorized agent of a business [REDACTED] manages. The allegation is supported. IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS Identified Costs: \$4,500.00 ACKNOWLEDGEMENT. Addressed previously

Allegation (1): [REDACTED] provided inaccurate information in her rental assistance applications, which resulted in improper grant funding from a County program. During the course of our investigation, [REDACTED] submitted three additional rental assistance applications (No. 7132, 172338, and 154457), which were denied. Our office reviewed [REDACTED] rental assistance applications, supporting documents, and the program guidelines. We also interviewed Community Services personnel, Ms. [REDACTED]s landlord, and attempted to interview [REDACTED]

Allegation (1) is supported. We found that [REDACTED] submitted inaccurate information to the County on her rental assistance applications. As a result of her actions, the County approved [REDACTED] rental assistance applications dated October 29, 2020 and October 30, 2020, and issued duplicate payments of \$4,500.00 to her landlord, [REDACTED]. The inappropriate payment resulted in Identified Costs2 of \$4,500.00.

[REDACTED] as her landlord in applications No. 25392, 37830, and 42027, the identical Balance Statement attached to both applications No. 37830 and 42027 reflected the landlord's name as "[REDACTED]" and was signed electronically by [REDACTED] Articles of Organization

were filed with the Florida Secretary of State Division of Corporations on December 9, 2019, with [REDACTED] listed as its Manager and Registered Agent and the address for the company as [REDACTED] Riviera Beach, FL 33404. Similarly, the Annual Reports for [REDACTED] filed on March 23, 2020, March 22, 2021, and March 16, 2022 list [REDACTED] as the Manager and Registered Agent, and the Annual Reports filed March 23, 2020 and, March 22, 2021 list the company's address as [REDACTED] Riviera Beach, FL 33404. [REDACTED] Articles of Organization were filed with the Florida Secretary of State Division of Corporations on April 10, 2017, with [REDACTED] listed as its Manager and Registered Agent. The business was administratively dissolved in September 2018 for failure to file an Annual Report. It was reinstated upon filing an Annual Report on June 27, 2020, with [REDACTED] listed as the Manager and [REDACTED] listed as "Authorized Agent." Annual reports filed on March 22, 2021 and March 16, 2022 also listed [REDACTED] as the Manager and [REDACTED] as [REDACTED] "Authorized Agent." Property Records for [REDACTED] Riviera Be

Property Records for [REDACTED] Riviera Beach, FL 33404 Applications No. 25392, 37830, and 42027 identified [REDACTED] rental address as [REDACTED] Riviera Beach, FL.4 She listed

the landlord's address as [REDACTED] in application No. 25392 and [REDACTED], Riviera Beach, FL in applications No. 37830 and 42027. The Palm Beach County Property Appraiser's online database shows that [REDACTED] has owned the property located at [REDACTED] Riviera Beach, FL 33404 since April 2003. According to the Alternate Street Name List found on Palm Beach County's website, [REDACTED]

[REDACTED] Food and Utility Assistance Application

[REDACTED] submitted Application # 44980 for food and utility assistance with the County on October 29, 2020 (the same day that [REDACTED] submitted application [REDACTED] and her email address as [REDACTED]. She listed her landlord as [REDACTED] with an address of [REDACTED] and her monthly rent payment as \$1,100.00. She requested assistance for April through August, 2020, for a total of \$6,250.00, including late fees. Per the OSCARSS review log, a County supervisor processed the application on October 6, 2020. Payment to [REDACTED] On October 13, 2020, the County issued check number 00

Payment to [REDACTED] On October 13, 2020, the County issued check number 00003206614 in the amount of \$5,500.006 to [REDACTED] for [REDACTED] rental assistance.

**

[REDACTED] Second Rental Assistance Application County records show [REDACTED] electronically signed and submitted rental assistance application number 42027 to the County on October 14, 2020. [REDACTED] her address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED], and again listed her email address as [REDACTED]. She listed her landlord [REDACTED] with an address of "[REDACTED]" and her monthly rent payment as \$1,100.00.

[REDACTED] requested assistance for September through November 2020, plus late fees, from April through November 2020, for a total of \$4,500.00. The County returned the application on October 19, 2020 and requested additional information, including income verification information and an explanation of how her loss of income was caused by COVID-19. [REDACTED] resubmitted this application on October 30, 2020, and it was processed by a County supervisor on November 1, 2020. The supporting documents [REDACTED] submitted with this application included a Balance Statement dated October 28, 2020, listing her landlord as [REDACTED], and signed by [REDACTED]. The Balance Statement indicated [REDACTED] owed rent of \$1,100.00 per month for September, October, and November of 2020, plus late charges of \$150.00 per month from April 2020 through November 2020, for a total of \$4,500.00

[REDACTED] certified that all information she provided was accurate when she electronically signed and submitted her application. Payment to [REDACTED] On December 17, 2020, the County issued check number 00003220139 in the amount of \$4,500.00 to [REDACTED] for rental assistance.

[REDACTED] Fourth Rental Assistance Application After Community Services submitted its complaint to the OIG [REDACTED] electronically signed and submitted a fourth rental assistance application number

71325 to the County on April 1, 2021. [REDACTED] manually input her address as [REDACTED]. [REDACTED] West Palm Beach, FL, her social security number as [REDACTED] and her email address as [REDACTED]. She listed her landlord as "Fauda A", and requested rental assistance of \$8,431.00 for the months of February through July 2021. She also requested utility assistance of \$240.00. On July 9, 2021, the County sent [REDACTED] an email stating her application had been denied "because your previous landlord was overpaid using CARES funds from your last applications."

[REDACTED] Fourth Rental Assistance Application After Community Services submitted its complaint to the OIG, [REDACTED] electronically signed and submitted a fourth rental assistance application number 71325 to the County on April 1, 2021. [REDACTED] manually input her address as [REDACTED] [REDACTED] West Palm Beach, FL, her social security number as [REDACTED] and her email address as [REDACTED]. She listed her landlord as "Fauda A", and requested rental assistance of \$8,431.00 for the months of February through July 2021. She also requested utility assistance of \$240.00. On July 9, 2021, the County sent [REDACTED] an email stating her application had been denied "because your previous landlord was overpaid using CARES funds from your last applications."

County again returned the application for full bank statements and verification of SNAP benefits. [REDACTED] [REDACTED] resubmitted the application on October 25, 2022. The County returned the application to her on that same date for additional documentation for proof of COVID crisis. [REDACTED] resubmitted the application on November 3, 2022. On November 17, 2022, the County again returned the application for documentation of proof of COVID crisis. [REDACTED] resubmitted the application on November 18, 2022. The County returned the application to her on December 7, 2022 for additional documentation. [REDACTED] [REDACTED] resubmitted the application on December 12, 2022. The County denied this application.

[REDACTED] Sixth Rental Assistance Application [REDACTED] electronically signed and submitted a sixth rental assistance application number 172338 to the County on December 15, 2022. [REDACTED] listed her address as [REDACTED] Riviera Beach, FL, her social security number as [REDACTED] and her email address as [REDACTED]. She listed her landlord as [REDACTED], and requested rental assistance of \$12,250.00 for the months of June through December 2022.12.

No funding has been received. I am still in need of assistance. I moved again into [REDACTED] house.

This concludes response to all allegations.

[REDACTED]

