



John A. Carey  
Inspector General

OFFICE OF INSPECTOR GENERAL  
PALM BEACH COUNTY



Inspector General  
Accredited

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*“Enhancing Public Trust in Government”*

**Redacted per §119.071(5)(b) and (5)(f)1,  
F.S., and 15 U.S.C. §9058a(4)(A)**

# Investigative Report

## 2022-0019

# False Information on Palm Beach County Emergency Rental Assistance Program Lake Worth Applications

## March 3, 2023



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PALM BEACH COUNTY

INVESTIGATIVE REPORT  
2022-0019

DATE ISSUED: : March 3, 2023



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FALSE INFORMATION ON PALM BEACH COUNTY EMERGENCY RENTAL  
ASSISTANCE PROGRAM LAKE WORTH APPLICATIONS

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] ("Applicant") applications to the County Emergency Rental Assistance program. Community Services alleged The Applicant submitted false employment documentation with her applications, which resulted in her landlord inappropriately receiving \$10,100.00.

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

**Allegation (1):** [REDACTED] provided false information in her rental assistance applications, which resulted in improper grant funding from a County program.

Our office reviewed the Applicant's rental assistance applications, supporting documents, and the program guidelines. We also interviewed the Applicant's former

employer and County personnel and attempted to interview the Applicant.

WHAT WE FOUND

**Allegation (1) is supported.** We found that the Applicant submitted falsified documents to the County in support of her rental assistance applications.

As a result of her actions, the County approved the Applicant's rental assistance application No. 72935 dated May 25, 2021, and application No. 77222 dated June 16, 2021, and issued payments of \$7,500.00 and \$2,600.00, respectively, to her landlord. The Applicant submitted her third rental assistance application No. 113910 on January 21, 2022, but Community Services did not approve or fund this application. The inappropriate payments to the landlord resulted in Identified Costs of \$10,100.<sup>1</sup>

We found sufficient information to warrant referring our findings to law enforcement (with a copy to the State Attorney's Office) for determination of whether the facts arise to a criminal act under section 817.03, Florida Statutes.

<sup>1</sup> 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.

We also found sufficient information to warrant notification of our findings to the United States Attorney's Office for a determination of whether they constitute a violation of Title 18, Chapter 47, section 1001, United States Criminal Code.

#### WHAT WE RECOMMEND

Because the Applicant repaid the Identified Costs of \$10,100.00 as a result of our investigation, we make no recommendations in this matter.

## BACKGROUND

### 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 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 17th, 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.



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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 Acknowledgement section for applications No. 72935, 77222, and 113910 included the following:

- I further certify that I have read 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 application required the applicant's printed name and submission date.

Community Services assigned applications it received to a Community Services reviewer. The reviewer checked to ensure the application 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 income guidelines, 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 & Comptroller's Office for payment processing.

#### Property Records for [REDACTED] Lake Worth, Florida

The Applicant submitted applications No. 72935, No. 77222, and No. 113910 seeking rental assistance for [REDACTED] Lake Worth, Florida. She identified her landlord as [REDACTED]. The Palm Beach County Property Appraiser's online database shows that [REDACTED] owns the property located at [REDACTED], in unincorporated Palm Beach County.

## ALLEGATIONS AND FINDINGS

### Allegation (1):

***The Applicant provided the County with False information in support of her rental assistance applications, which resulted in improper grant funding from a County program.***

### Governing Directives:

Palm Beach County Emergency Rental Assistance Program application and program guidelines.

### Finding:

The information obtained **supports** the allegation.

## The Applicant's First Rental Assistance Application

County records show the Applicant electronically signed and submitted rental assistance application number 72935 to the County on April 1, 2021. The Applicant listed her address as [REDACTED], Lake Worth, FL, and her monthly rent payment as \$1,300.00. She requested assistance for April 2020 through March 2021.

The County returned the application to the Applicant on April 2, 2021, and requested a copy of her lease agreement. The Applicant resubmitted her application that same date, and on April 8, 2021, the County again returned the application and requested additional information. The Applicant resubmitted her application later that same date requesting assistance for April 2020 through March 2021. The County again returned the application to the Applicant on April 12, 2021, and requested that the Applicant update the application to include a request for assistance for the month of April 2020<sup>2</sup>. The Applicant resubmitted her application on that same date. The County again returned the application on May 24, 2021, because the assistance requested on the application exceeded the 12-month maximum payment allowed. The Applicant resubmitted her application on May 25, 2021, again seeking assistance for April 2020 to March 2021.<sup>3</sup>

**OSCARSS APPLICATION: 72935**

Additional Questions - Self Attestation

Is your Crisis COVID-19 or NON-COVID Related? \* COVID-19

**Crisis is due to Direct or Indirect causes from COVID-19: \***

- ✓ Reduction or Loss of Income
  - Lost Employment
  - Qualified for Unemployment
- ✓ Increase in Expenses Due to COVID-19
  - Caring for or being a High Risk Individual
  - Responsible for Caring for Children / Grandchildren at Home

**At Risk of Homelessness or Housing Instability: \***

- ✓ Rental Eviction Notice
- ✓ Past Due Rent Notice
- Utility Disconnection Notice
- Past Due Utility Notice

The Applicant attested that her crisis was Covid-19 related. In the Declaration of Crisis section of the application, she wrote:

<sup>2</sup> We believe that the reviewer intended to ask The Applicant to update the application to include April 2021, but inadvertently asked her to update it to include April 2020. The Applicant's applications had requested assistance from April 2020 to March 2021, however, the balance sheet submitted by the landlord on April 8, 2021, showed past due rent from April 2020 to April 2021. Due to the discrepancy between the balance sheet and the application submitted on April 8, 2021, the reviewer returned the application to the Applicant.

<sup>3</sup> The landlord resubmitted a balance sheet dated May 26, 2021, for past due rent for April 2020 to March 2021.

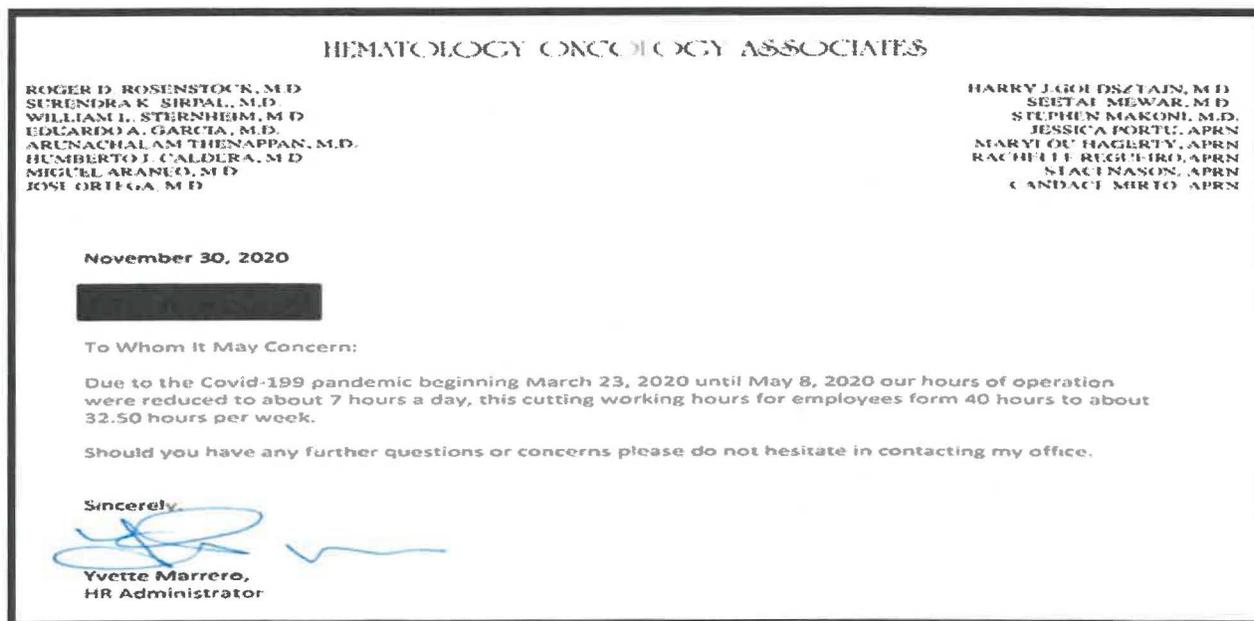
I have experienced a loss of job hours, reduction in hours, loss of income (partial) due to Covid-19. This has left me no other option but to make partial monthly payments to my landlord. I am unable to pay the remaining past due balances for the last 12 months due to Covid-19 crisis. (April 2020-May 2021) I will be evicted if I do not pay the past due balance of \$7,500.00.

**Declaration of Crisis (Please Explain the reason for your Crisis Situation below):**

I have experienced a loss of job hours, reduction in hours, loss of income (partial) due to Covid-19. This has left me no other option but to make partial monthly payments to my landlord. I am unable to pay the remaining past due balances for the last 12 months due to Covid-19 crisis. (April 2020-May 2021) I will be evicted if I do not pay the past due balance of \$7,500.00.

The supporting documents the Applicant submitted with this application included two different letters, one dated November 30, 2020 and the other dated April 28, 2021, both purporting to be from Hematology Oncology Associates. The letters were purported on a Hematology Oncology Associates' letterhead and signed by the company's Human Resources Administrator, Yvette Marrero. The November 30, 2020 letter stated,

Due to Covid-199 [sic] pandemic beginning March 23, 2020 until May 8, 2020 our hours of operation were reduced to about 7 hours a day, this cutting working hours for employees form [sic] 40 hours per week to about 32.50 hours per week.



The April 28, 2021 letter stated that the company's hours of operation had been reduced effective January 1, 2021 forward, due to Covid-19.



The Applicant certified that all the documents she provided were accurate when she electronically signed and submitted her rental assistance application.

### **Balance Statements Submitted with Application 72935**

The Applicant's landlord submitted a balance statement dated April 8, 2021 showing a total of \$8,125.00 in past due rent, including late fees, for April 2020 through April 2021. The balance statement was signed electronically by the landlord.

On May 21, 2021, the County rejected the Applicant's application and supporting balance statement dated April 8, 2020, because they reflected a request for assistance for past due rent exceeding 12 months.

The OSCARSS log reflects that the Applicant resubmitted her application on May 25, 2021, and her landlord electronically submitted an updated balance statement on May 26, 2021. The application and balance statement reflected a request for assistance for past due rent from April 2020 to March 2021. The balance sheet showed a total of \$7,500.00 in past due rent, including late fees. The balance statement was signed electronically by the landlord.



### Landlord's Balance Statement



**Tenants Name:** [REDACTED]

**Tenants Address:** [REDACTED]

**Vendor Code:** VS0000020054

**Vendor Name:** [REDACTED]

**Vendor DBA:** [REDACTED]

**Vendor Address:** [REDACTED]

Month	Rent Due	Late Fee	Legal Fee	Total Due
Month 1 April 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 2 May 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 3 June 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 4 July 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 5 August 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 6 September 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 7 October 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 8 November 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 9 December 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 10 January 2021	\$550.00	\$75.00	\$0.00	\$625.00
Month 11 February 2021	\$550.00	\$75.00	\$0.00	\$625.00
Month 12 March 2021	\$550.00	\$75.00	\$0.00	\$625.00
Month 13 April 2021	\$550.00	\$75.00	\$0.00	\$625.00
<b>Grand Total:</b>				<b>\$8,125.00</b>

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### Landlord's Balance Statement



I certify that the above information is true and correct and I am authorized to collect rental payments on this property.

I certify that the months requested by my tenant are past due and I have not received rents for the months listed on this request and/or the future rent listed above will be applied towards the tenant's account.

I certify that I will return any Future Rent paid on my Tenant's behalf to Palm Beach County if they vacate my property prior to any Future Rent collected as stated in this Balance Statement.

I certify that the mailing address is correct.

\_\_\_\_\_  
Electronically Signed By

04/06/2021  
Date



### Landlord's Balance Statement



**Tenants Name:** [REDACTED]

**Tenants Address:** [REDACTED]

**Vendor Code:** VS0000020054

**Vendor Name:** [REDACTED]

**Vendor DBA:** [REDACTED]

**Vendor Address:** [REDACTED]

Month	Rent Due	Late Fee	Legal Fee	Total Due
Month 1 April 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 2 May 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 3 June 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 4 July 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 5 August 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 6 September 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 7 October 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 8 November 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 9 December 2020	\$550.00	\$75.00	\$0.00	\$625.00
Month 10 January 2021	\$550.00	\$75.00	\$0.00	\$625.00
Month 11 February 2021	\$550.00	\$75.00	\$0.00	\$625.00
Month 12 March 2021	\$550.00	\$75.00	\$0.00	\$625.00
<b>Grand Total:</b>				<b>\$7,600.00</b>

 **Landlord's Balance Statement** 

I certify that the above information is true and correct and I am authorized to collect rental payments on this property

I certify that the months requested by my tenant are past due and I have not received rents for the months listed on this request and/or the future rent listed above will be applied towards the tenant's account.

I certify that I will return any Future Rent paid on my Tenant's behalf to Palm Beach County if they vacate my property prior to any Future Rent collected as stated in this Balance Statement.

I certify that the mailing address is correct

I understand that by signing and submitting this balance statement I am agreeing to accept funds on behalf of the tenant for the property listed above and that in doing so, tenant may remain on the property and no steps will be taken to evict the tenant for the period covered by this rental assistance, whether the received check is cashed or not.

\_\_\_\_\_  
**Electronically Signed By**

05/26/2021  
**Date**

### Payment to the Landlord

Per the OSCARSS review log, the County approved the application on June 2, 2021. On June 2, 2021, the County Clerk and Comptroller issued check number 00003242060 in the amount of \$7,500.00 to the landlord for rent assistance, including late fees.

 **BOARD OF COUNTY COMMISSIONERS**  
**PALM BEACH COUNTY**  
**WEST PALM BEACH, FLORIDA**

64-375/612  
 WELLS FARGO BANK, N.A.

CHECK NO. 00003242060  
 DATE 06/02/2021

AMOUNT \$\*\*\*\*\*7,500.00

PAY TO THE ORDER OF \_\_\_\_\_

Seven Thousand Five Hundred And 00/100 Dollars

\_\_\_\_\_  
 CLERK OF THE COUNTY COMMISSIONERS

\_\_\_\_\_  
 MAYOR

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

06 2 21





### The Applicant's Second Rental Assistance Application

County records show the Applicant electronically signed and submitted rental assistance application number 77222 to the County on June 7, 2021. The Applicant listed her address as \_\_\_\_\_ Lake Worth, FL, and her monthly rent payment as \$1,300.00. She requested assistance of \$3,900.00 in future rent for July 2021 through September 2021.

In the Declaration of Crisis section of the form, the Applicant wrote:

I have experienced a loss of job hours, reduction in hours, loss of income (partial) due to Covid-19. I am applying for 3 months future rent to allow me to save. I am unable to 'catch up' for the last 12 months due to Covid-19 crisis.

Declaration of Crisis (Please Explain the reason for your Crisis Situation below): \*

I have experienced a loss of job hours, reduction in hours, loss of income (partial) due to Covid-19. I am applying for 3 months future rent to allow me to save. I am unable to "catch up" for the last 12 months due to Covid-19 crisis.

The supporting documents the Applicant submitted with this application included the same two letters, dated November 30, 2020 and April 28, 2021, purporting to be from Hematology Oncology Associates that she had submitted with her first application. The supporting documents also included a pay stub that reflected a reduction in hours, consistent with the letter purportedly from Hematology Oncology Associates.

The Applicant certified that these letters and all other documents she provided were accurate when she electronically signed and submitted her application.

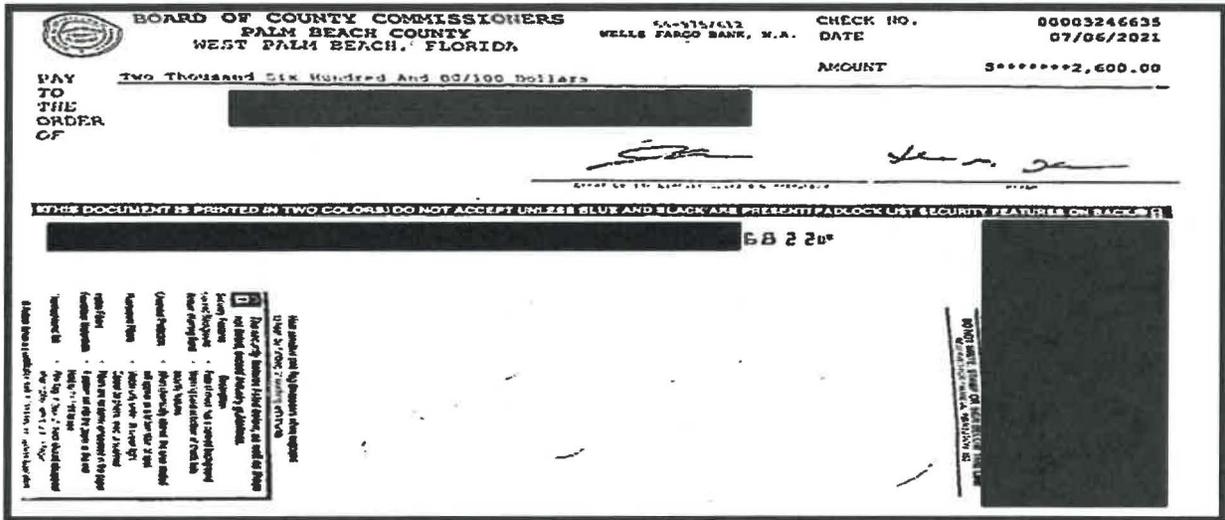
The County returned the application to the Applicant on June 8, 2021 and requested additional information, including a balance statement and proof of income. The Applicant resubmitted her application on June 10, 2021. The County again returned the application on June 11, 2021 requesting additional information, including a balance statement and the Applicant's most recent paystub. The Applicant resubmitted her application on June 14, 2021. The County again returned the application on June 15, 2021, requesting a landlord balance statement. The Applicant resubmitted her application on June 16, 2021. Per the OSCARSS review log, the County approved the application on July 2, 2021.

### **Payment to the Landlord**

On July 6, 2021, the County Clerk and Comptroller issued check number 00003246635 in the amount of \$2,600.00<sup>4</sup> to the landlord for the Applicant's rent assistance.

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<sup>4</sup> The application's routing log noted that the County would not pay rental assistance for the month of September 2021 because that month had already been paid as last month's rent at the time the Applicant leased the apartment.



### The Applicant's Third Rental Assistance Application

County records show the Applicant electronically signed and submitted rental assistance application number 113910 to the County on January 21, 2022. The Applicant listed her address as [REDACTED] Lake Worth, FL and her monthly rent payment as \$1,500.00. She requested assistance of \$4,575.00, including \$75.00 in late fees, for February 2022 through April 2022.

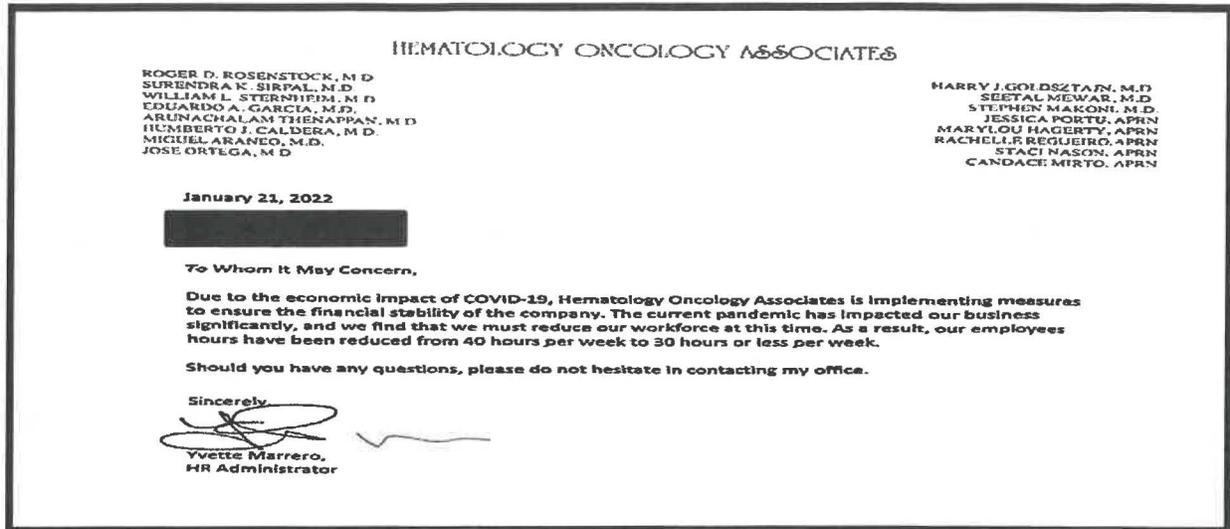
In the Declaration of Crisis Section of this application, the Applicant stated,

I have a reduction of working hours/loss of income with an increase in expenses due to Covid-19. I am requesting financial assistance for 3 months future rent. I am financially struggling to make ends meet.

Declaration of Crisis (Please Explain the reason for your Crisis Situation below):

I have a reduction of working hours/loss of income with an increase in expenses due to Covid-19. I am requesting financial assistance for 3 months future rent. I am financially struggling to make ends meet.

The supporting documents the Applicant submitted with this application included a letter purporting to be from Hematology Oncology Associates. It is worded differently than the Hematology Oncology Associates letters the Applicant submitted with her two previous applications, but also stated that the Applicant's employment hours had been reduced due to Covid-19. The letter was dated January 21, 2022, and purportedly signed by Yvette Marrero.



The Applicant certified that this employer letter and all other documents she provided were accurate when she electronically signed and submitted her application.

The County returned the application to the Applicant on January 27, 2022, requesting that she provide two months of paystubs and two months of bank statements. The Applicant resubmitted her application on January 28, 2022, and added the month of May 2022 to her request for assistance. The County again returned the application to the Applicant on February 1, 2022, stating that she needed to remove the request for rent for the month of May. She resubmitted the application that same date. On February 11, 2022, Community Services returned the application to the Applicant, along with an email stating that her application was being returned because the employer letter she submitted could not be verified. The email further stated that the Applicant had 15 days to update her application and resubmit it or it would be “automatically closed due to non-response.” On February 11, 2022, the Applicant deleted her third application in the OSCARSS system.

### **OIG Interview of Yvette Marrero, Hematology Oncology Associates HR Manager**

Ms. Marrero told the OIG that Hematology Oncology Associates employed the Applicant for two and a half years as a Front Pharmacy Assistant prior to her being terminated on February 11, 2022. Ms. Marrero said that she authored the letter the Applicant provided to the County dated November 30, 2020, but the letters allegedly from the company dated April 28, 2021 and January 21, 2022, and the corresponding pay stubs were altered and inaccurate. Ms. Marrero stated the Applicant’s hours were in fact reduced, but only for 50 days, from March 23, 2020 until May 8, 2020. She said the office never closed and the office days never changed during the Covid-19 pandemic.

### **The Applicant’s Reimbursement to Palm Beach County**

The OIG attempted to interview the Applicant. The Applicant’s attorney told the OIG that the Applicant would not provide a statement. Then, on July 14, 2022, the Applicant

provided a repayment to the County in the amount of \$10,100.00 for reimbursement of rental assistance funds for applications 72935 and 77222.

### Conclusion

The Applicant submitted three applications for rental assistance. On each occasion, she attested that she provided accurate information to the County. During the OIG's interview with the Applicant's employer, the company advised our office that it had provided the Applicant documentation dated November 30, 2020, stating that the company reduced hours for employees from March 23, 2020 until May 8, 2020. Based upon our review of the documents and the statement of the Applicant's employer, **we found that the employment letters dated April 28, 2021, that the Applicant submitted to the County with applications No. 72935 and 77222, and the employment letter dated January 21, 2022, that she submitted with application No. 113910 in support of her applications were fabricated. Additionally, the paystub she submitted with application 77222 was altered to falsely reflect a reduction in hours.**

As a result of the false information the Applicant provided in her first two applications (No. 72935 and 77222), the County issued checks for \$7,500.00 and \$2,600.00, respectively, to the Applicant's landlord for her rent. We find the total amount of rental assistance issued of **\$10,100.00** to be Identified Costs.

**We also find that the Applicant attempted to collect County funds based on her submission of false documents with her third rental assistance application (No. 113910), which was denied with no rental assistance funds issued.**

The allegation that The Applicant provided false information in her rental assistance applications is **supported**.

### IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

**Identified Costs:** \$ 10,100.00

### 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

Because the Applicant has already repaid the Identified Costs of \$10,100.00, we make no recommendations in this matter.

**RESPONSE FROM MANAGEMENT**

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

The department concurs with Inspector General's report. Since the client has returned the assistance dollars to PBC, no action is needed at this time from the department.

**RESPONSE FROM THE APPLICANT**

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, [REDACTED] 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. Her written response was received from her legal counsel, as follows:

On behalf of [REDACTED] we have received the report. No further comment.

*This Investigation has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles & Quality Standards for Investigations.*