



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 15 and
U.S.C. §9058a (4)(a)**

Investigative Report

2022-0016

False Information on County COVID-19 Assistance Program Applications - Lake Worth

March 4, 2025



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INVESTIGATIVE REPORT 2022-0016

DATE ISSUED: March 4, 2025



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FALSE INFORMATION ON COUNTY COVID-19 RELATED ASSISTANCE PROGRAM APPLICATIONS - LAKE WORTH

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 Mr. [REDACTED] (Applicant 1) and Ms. [REDACTED] (Applicant 2)'s applications to the County Coronavirus Aid, Relief and Economic Security (CARES) Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program and the Emergency Rental and Utilities Assistance Program.

Community Services alleged that Applicant 1 and Applicant 2 each submitted rental assistance applications listing the other as landlord, and that on one of Applicant 1's applications, he listed Applicant 2 as his co-tenant. Additionally, Community Services alleged that Applicant 2 used her mother's name to register with the County as Applicant 1's landlord for Applicant 1's application.

Based upon our initial review of Applicant 1's and Applicant 2's applications and accompanying documents, the OIG initiated an investigation of the following allegations:

Allegation (1): Applicant 1 provided false information to the County in his assistance applications, which resulted in improper grant funding from County Programs.

Allegation (2): Applicant 2 provided false information to the County in her assistance applications, which resulted in improper grant funding from a County Program.

Allegation (3): Applicant 2 provided false vendor information to the County in order to register as Applicant 1's landlord, which resulted in the issuance of rental assistance checks to Applicant 2.

Our office reviewed Applicant 1's and Applicant 2's assistance applications and supporting documents, the assistance program guidelines, County vendor and Clerk of Court records, and Applicant 2's financial records. We also interviewed Applicant 2's mother, and attempted to interview Applicant 1 and Applicant 2.

WHAT WE FOUND

Allegation (1) is supported: We found that Applicant 1 submitted falsified information to the County in support of his assistance applications, which resulted in improper grant funding from County Programs.

Allegation (2) is supported: We found that Applicant 2 submitted falsified information to the County in support of her assistance applications, which resulted in improper grant funding from a County Program.

Allegation (3) is supported: We found that Applicant 2 provided false information to the County in order to register as Applicant 1's assistance applications, which resulted in the issuance of rental assistance checks to Applicant 2.

As a result of Applicant 1's and Applicant 2's actions, the County approved two of Applicant 1's applications and one of Applicant 2's applications, and issued a total of \$10,367.50 in funding, which we find to be Identified Costs.¹

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

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

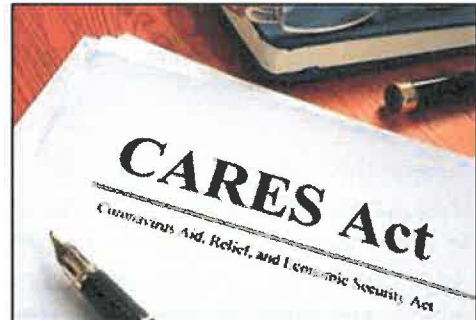
We make one recommendation; that the County seek reimbursement of **\$10,367.50** in issued funds.

¹ 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 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 \$8.3 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. Applicants were eligible for assistance for food, past due rent, and/or utilities due from March 1, 2020 to December 31, 2020.

Emergency Rental and Utilities 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. 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 duration of the Programs, but each included eligibility questions and acknowledgements. Applicants were required to affirm these statements by electronically checking a box next to each one. Applicants had to check each box every time they submitted or re-submitted an application.

The Acknowledgement section for applications during the period relevant to this report included the following:

I further certify that I have read⁵ 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 electronic signature.

⁵ In the version of this acknowledgment for applications 17939, 49315, 65969, 80248, 22402, and 39412, there was a comma after the word "read." The rest of this acknowledgment was identical for the 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 & Comptroller's Office for payment processing.

The County Clerk and Comptroller's Office paid funds for rental assistance 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. Food assistance would be provided using a debit card mailed directly to the applicant.

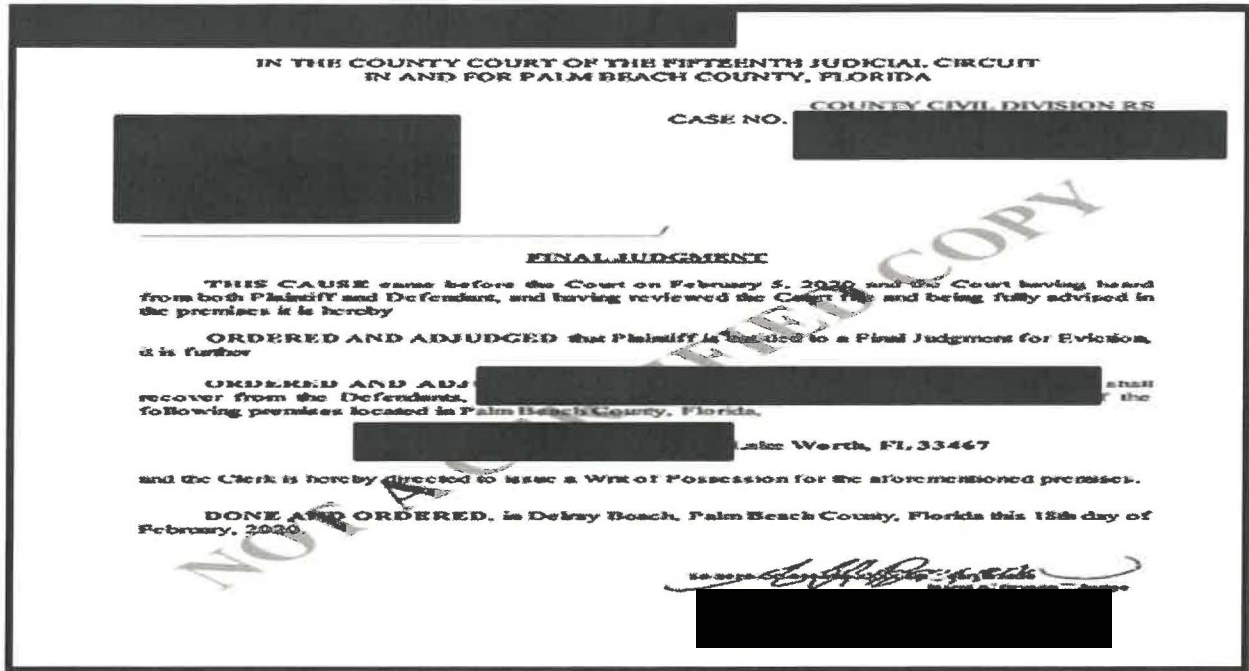
Records for [REDACTED] Lake Worth, FL 33467

The County received applications 17939, 49315, 65969, 80248 seeking rental assistance for Applicant 1 at [REDACTED] Lake Worth, FL 33467. The County also received application 22402 seeking rental assistance for Applicant 2 at a different address, but listing Applicant 1's of [REDACTED] Lake Worth, FL 33467 as her landlord. The Palm Beach County Property Appraiser's online database shows that at the time of the submission of those assistance applications, Applicant 2's mother and father owned a mobile home at [REDACTED] Lake Worth, FL 33467. This mobile home was located on land within the [REDACTED] Palm Beach County Official Records show that the mobile home park has been owned by [REDACTED] since April 2010.

The [REDACTED] management told the OIG that from 1998 until June 2023, Applicant 2's father and mother resided in a mobile home they owned on a lot they rented at [REDACTED] Lake Worth, FL 33467.

Applicant 1 and Applicant 2’s Eviction from [REDACTED] Lake Worth, FL 33467

According to the Palm Beach County Clerk of Court records, on February 18, 2020, a court entered a Final Judgment for Eviction, case number [REDACTED]-,



in favor of Applicant 2’s mother and father and against Applicant 1 and Applicant 2 for possession of property located at [REDACTED] Lake Worth, FL 33467.

ALLEGATIONS AND FINDINGS

Allegation (1):

Applicant 1 provided false information to the County in his assistance applications, which resulted in improper grant funding from County programs.

Governing Directives:

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

Finding:

The information obtained **supports** the allegation.

Applicant 1 submitted the following applications under the County's CARES Act and ERA Programs:

Application No.	Application Submission Date	Date of County Payment	Type of Assistance	Amount Paid	Approved
17939	10/28/2020	N/A	Food & Rental	N/A	No
49315	11/12/2020	1/9/2021	Food	\$ 900.00	Yes
		12/14/2020	Rental	\$ 4,537.50	Yes
65969	1/23/2021	2/3/2021	Rental	\$ 3,630.00	Yes
80248	6/27/2021	N/A	Rental	N/A	No
Total				\$ 9,067.50	

Applicant 1's Rental and Food Assistance Application 17939

County records show that on October 28, 2020, Rental and Food Assistance Application 17939 was submitted to the County on Applicant 1's behalf. The application listed Applicant 1's residential address as [REDACTED] Lake Worth, FL 33467 and his mailing address as [REDACTED], Lake Worth, FL 33460. He listed his landlords as Applicant 2's mother and father, with the address [REDACTED] Lake Worth, FL 33467; email [REDACTED] and phone number [REDACTED].

In addition, Applicant 1 identified additional household members to include Applicant 2 and a minor child. The application stated that Applicant 1 had received an eviction notice due to the COVID-19 pandemic.

Applicant 1 listed his monthly rent on application No. 17939 as \$875.00 and requested \$4,938.00 in past due rental assistance from April 3 to August 3, 2020.

OSCARSS APPLICATION: 17939

Annual Household Income		
Description		
Annual Income Prior to COVID-19 Crisis	\$5,520.00	\$31,000.00
Checking Account Balance		\$104.00
Unemployment Wages (Last 2 Months)	\$241.00	\$575.00

Last 2 Months Household Income		
Description		
Annual Income Prior to COVID-19 Crisis		
Checking Account Balance		
Unemployment Wages (Last 2 Months)		

Services Requested	
<input checked="" type="checkbox"/>	Rental Payment
<input checked="" type="checkbox"/>	Food

Additional Questions - Rental Assistance	
What is the Rent Due Date?	07/03/20
What is your Landlord's Name?	
What is your Landlord's Address?	
What is your Landlord's Email Address?	
What is your Landlord's Phone Number?	
What is your Monthly Rent Amount?	\$875.00
Are you currently receiving section 8 or any federal housing subsidies?	No
Did you receive a Rental Late or Eviction Notice?	Yes
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic?	Yes
What is the Rental Past Due Start Date?	04/03/2020
What is the Rental Past Due End Date?	08/03/2020
What is the Rental Past Due Amount Requested?	\$4,938.00

Applicant 1 attested in the application that his crisis was COVID-19 related. In the Declaration of Crisis section of the application, he wrote

I am a plumber and many coworkers tested positive and were told by owner not to inform anybody of results and continue to work!one of them warned me (knowing i have lupus).My doctor immediately ordered me to quarantine for 14!days and get tested asap.I gave my boss Copy of order.About a week into quarantine I received text from my boss that I was no longer n I have was no longer needed.

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

I am a plumber and many coworkers tested positive and were told by owner not to inform anybody of results and continue to work!one of them warned me (knowing i have lupus).My doctor immediately ordered me to quarantine for 14!days and get tested asap.I gave my boss Copy of order.About a week into quarantine I received text from my boss that I was no longer n I have was no longer needed.

Applicant 1 also requested food assistance in application 17939.

The County returned the application to Applicant 1 on October 29, 2020 and requested all pages of his lease, all pages of his 2019 tax return, and check stubs from February and March of 2020 to show his income prior to the COVID-19 crisis. Applicant 1 resubmitted the application on October 30, 2020. The County returned the application to Applicant 1 on November 10, 2020, and requested all pages of his lease with signatures. Applicant 1 resubmitted the application on November 11, 2020.

Residential Lease Agreement Submitted with Application 17939

The Residential Lease Agreement submitted in support of the application provided that the agreement was between Applicant 1, as tenant, and Applicant 2's mother and father, as landlords, for ██████████ Lake Worth, FL 33467, and that the monthly rent was \$875.00, for a period commencing for November 3, 2019 "and continuing on a year-to-year basis until the Landlord or the Tenant terminates the tenancy." The lease also provided that failure to timely pay rent could result in late fees totaling \$32.50 per infraction. The final page of the lease purports to be signed by ██████ and Applicant 2's mother. Additionally, two signatures appear above the line for Tenant: Applicant 1. The two signatures appear to be for Applicant 1 and Applicant 2.⁶

⁶ This signature is similar to signatures that appear on other documents obtained by the OIG that purport to belong to Applicant 2, including check number 00003225952 in the amount of \$3,630.00, which was issued to Applicant 2 for Applicant 1's rental assistance.

Application # 17737

Residential Lease Agreement

THIS LEASE (the "Lease") dated this 15th day of November, 2019.

BETWEEN:

[REDACTED]
(the "Landlord")

OF THE FIRST PART

- AND -

[REDACTED]
(the "Tenant")

OF THE SECOND PART

IN CONSIDERATION OF the Landlord leasing certain premises to the Tenant, the Tenant leasing those premises from the Landlord and the mutual benefits and obligations provided in this Lease, the receipt and sufficiency of which consideration is hereby acknowledged, the parties to this Lease agree as follows:

Leased Property

1. The Landlord agrees to rent to the Tenant the studio, municipally described as [REDACTED] Blvd, Lake Worth, FL 33467, USA (the "Property"), for use as residential premises only. Neither the Property nor any part of the Property will be used at any time during the term of this Lease by Tenant for the purpose of carrying on any business, profession, or trade of any kind, or for the purpose other than as a private single-family residence.

Page 1 of 13

Residential Lease Page 12 of 13

Tenant is responsible who may be on the Property of the Landlord or for any loss of or damage or injury to any property, including cars and contents thereof belonging to the Tenant or to any other person for whom the Tenant is responsible.

63. The Tenant is responsible for any person or persons who are upon or occupying the Property or any other part of the Landlord's premises at the request of the Tenant, either express or implied, whether for the purposes of visiting the Tenant, making deliveries, repairs or attending upon the Property for any other reason. Without limiting the generality of the foregoing, the Tenant is responsible for all members of the Tenant's family, guests, servants, tradesmen, repairmen, employees, agents, invitees or other similar persons.

64. During the last 30 days of this Lease, the Landlord or the Landlord's agents will have the privilege of displaying the usual 'For Sale' or 'For Rent' or 'Vacancy' signs on the Property.

65. Time is of the essence in this Lease. Every calendar day except Saturday, Sunday or U.S. national holidays will be deemed a business day and all relevant time periods in this Lease will be calculated in business days. Performance will be due the next business day, if any deadline falls on a Saturday, Sunday or a national holiday. A business day ends at five p.m. local time in the time zone in which the Property is situated.

IN WITNESS WHEREOF The parties have duly affixed their signatures on this 15th day of November, 2019.


[REDACTED SIGNATURE]

The Tenant acknowledges receiving a duplicate copy of this Lease signed by the Tenant and the Landlord on the 15th day of November, 2019.


Landlord Balance Statement Submitted with Application 17939

The Balance Statement submitted with application 17939 lists Applicant 1 and Applicant 2 as tenants at [REDACTED] Lake Worth, FL 33467. The Landlord Balance Statement listed the past due amount as \$4,937.50, including rent, late fees, and court costs, and appears to have been signed by Applicant 2's father, as landlord.

Application # 17939



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



Tenants Name (Print) [REDACTED]
Address: [REDACTED]

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 4937.50

Monthly arrears:

Example: Month <u>April 2017</u>	\$ <u>1000</u>	Late Charges	\$ <u>50</u>
Month <u>April 2020</u>	\$ <u>875.00</u>	Late Charges	\$ <u>32.50</u>
Month <u>May 2020</u>	\$ <u>875.00</u>	Late Charges	\$ <u>32.50</u>
Month <u>June 2020</u>	\$ <u>875.00</u>	Late Charges	\$ <u>32.50</u>
Month <u>July 2020</u>	\$ <u>875.00</u>	Late Charges	\$ <u>32.50</u>
Month <u>Aug 2020</u>	\$ <u>875.00</u>	Late Charges	\$ <u>32.50</u>

Attorney Fees: \$ N/A Court Cost \$ 400.02 paid, notice re
filing charge) pay or save

Landlords Name (Print) [REDACTED] Signature [REDACTED] Date 10/23/2020

The County denied Applicant 1’s application on November 12, 2020, citing that Applicant 2’s last name was the same as the landlord’s and stating that Applicant 1 would have to prove that they are not related. This application remained in denied status thereafter.

Applicant 1 Rental and Food Assistance Application 49315

On November 12, 2020, the same day that the County denied application 17939, records show that Rental and Food Assistance Application 49315 was submitted to the County on behalf of Applicant 1. In this application, Applicant 1 listed himself as the sole household member.

Application 49315 listed Applicant 1’s residential address as [REDACTED] Lake Worth, FL 33467 and his mailing address as [REDACTED] Lake Worth, FL 33460. He listed Applicant 2’s father as his landlord (without Applicant 2’s mother), with an address of [REDACTED]. The application listed his monthly rental rate as \$875.00 and the past due amount of \$4,538.00 for June 2020 to September 2020.

Annual Household Income

Description	
Annual Income Prior to COVID-19 Crisis	\$30,000.00
Current Reduced Monthly Wages	\$2,250.00

Last 2 Months Household Income

Description	
Annual Income Prior to COVID-19 Crisis	
Current Reduced Monthly Wages	

Services Requested

- Rental Payment
- Food

Additional Questions - Rental Assistance

What is the Rent Due Date?	06/03/20
What is your Landlord's Name?	
What is your Landlord's Address?	
What is your Landlord's Email Address?	
What is your Landlord's Phone Number?	
What is your Monthly Rent Amount?	\$875.00
Are you currently receiving section 8 or any federal housing subsidies?	No
Did you receive a Rental Late or Eviction Notice?	Yes
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic?	Yes
What is the Rental Past Due Start Date?	06/03/20
What is the Rental Past Due End Date?	09/03/20
What is the Rental Past Due Amount Requested?	\$4,538.00

Applicant 1 attested that his crisis was COVID-19 related. In the Declaration of Crisis section of the application, he wrote

My company had multiple men test positive and still kept them on the job working right by me and did not allow anyone to quarantine. At the time cdc mandated anyone who had contact with positive person self quarantine. My doctor was ordered me to self quarantine and I have lupus. My boss fired me because I self quarantined when he had multiple positive men on the job and more became infected.

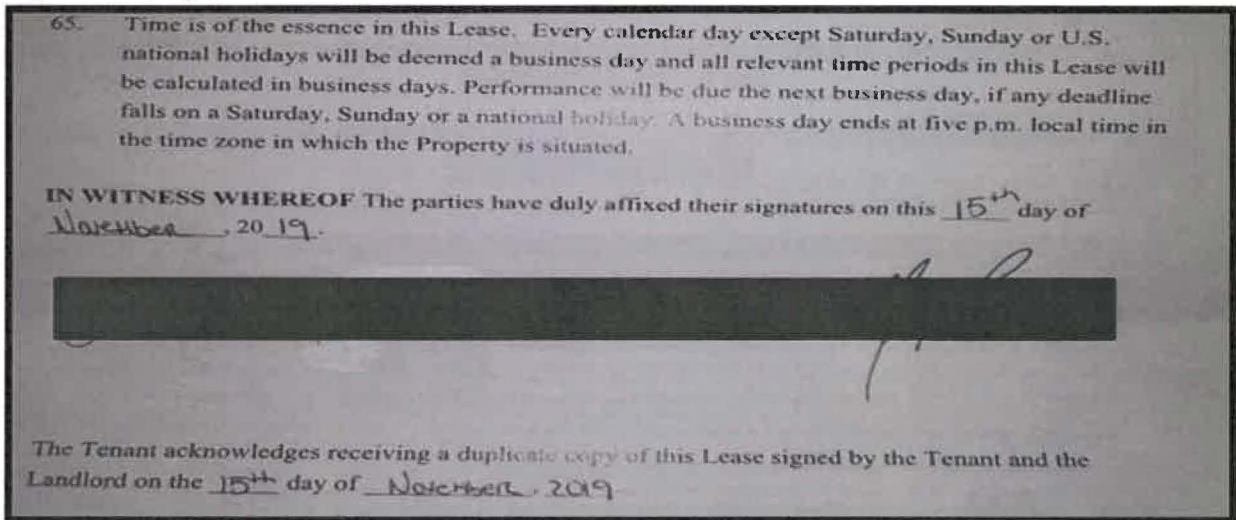
Declaration of Crisis (Please Explain the reason for your Crisis Situation below):

My company had multiple men test positive and still kept them on the job working right by me and did not allow anyone to quarantine. At the time cdc mandated anyone who had contact with positive person self quarantine. My doctor was ordered me to self quarantine and I have lupus. My boss fired me because I self quarantined when he had multiple positive men on the job and more became infected.

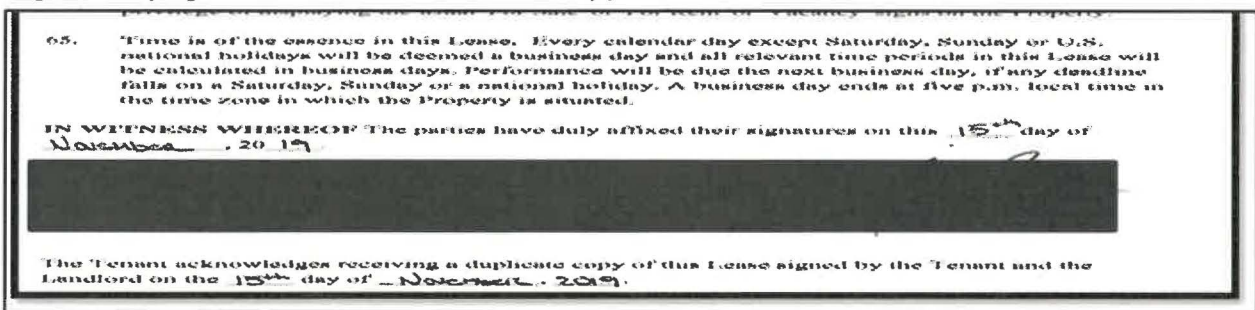
Residential Lease Agreement Submitted with Application 49315

The Residential Lease Agreement submitted with application 49315 is the same as the lease submitted with application 17939, with one significant difference—only one signature appears above Applicant 1’s name as tenant, the second signature belonging to Applicant 2 appears to have been whited out and Applicant 1’s name printed instead.

Signature page for lease submitted with application 49315



Signature page for lease submitted with application 17939



Landlord Balance Statement Submitted with Application 49315

Although application 49315 sought rent assistance for June 2020 to September 2020, the same landlord Balance Statement that had been submitted with application 17939 reflecting amounts due from April 2020 to August 2020 was submitted with application 49315, with on notable difference--- Applicant 2's name as tenant was whited out and replaced with Applicant 1's name. The Balance Statement contained a signature purportedly belonging to Applicant 2's father, as landlord.

Balance Statement submitted with application 49315

CLACK COUNTY COMMUNITY SERVICES
Balance Statement
(To be completed by Landlord/Property Manager)

[Redacted]

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 4937.50

Monthly arrears:

Example: Month: <u>April 2013</u>	\$ <u>1000</u>	Late Charges	\$ <u>50</u>
Month: <u>April 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>May 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>June 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>July 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>Aug 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>

Attorney Fees: \$ N/A

Court Cost \$ 400
(Excludes filing charges, notice to evict, service charge) and/or fees

[Redacted] 10/23/2020
Landlord's Name (Print) Signature Date

Balance Statement submitted with application 17939

CLACK COUNTY COMMUNITY SERVICES
Balance Statement
(To be completed by Landlord/Property Manager)

Application # 17939

[Redacted]

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 4937.50

Monthly arrears:

Example: Month: <u>April 2013</u>	\$ <u>1000</u>	Late Charges	\$ <u>50</u>
Month: <u>April 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>May 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>June 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>July 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>
Month: <u>Aug 2020</u>	\$ <u>875</u>	Late Charges	\$ <u>22.50</u>

Attorney Fees: \$ N/A

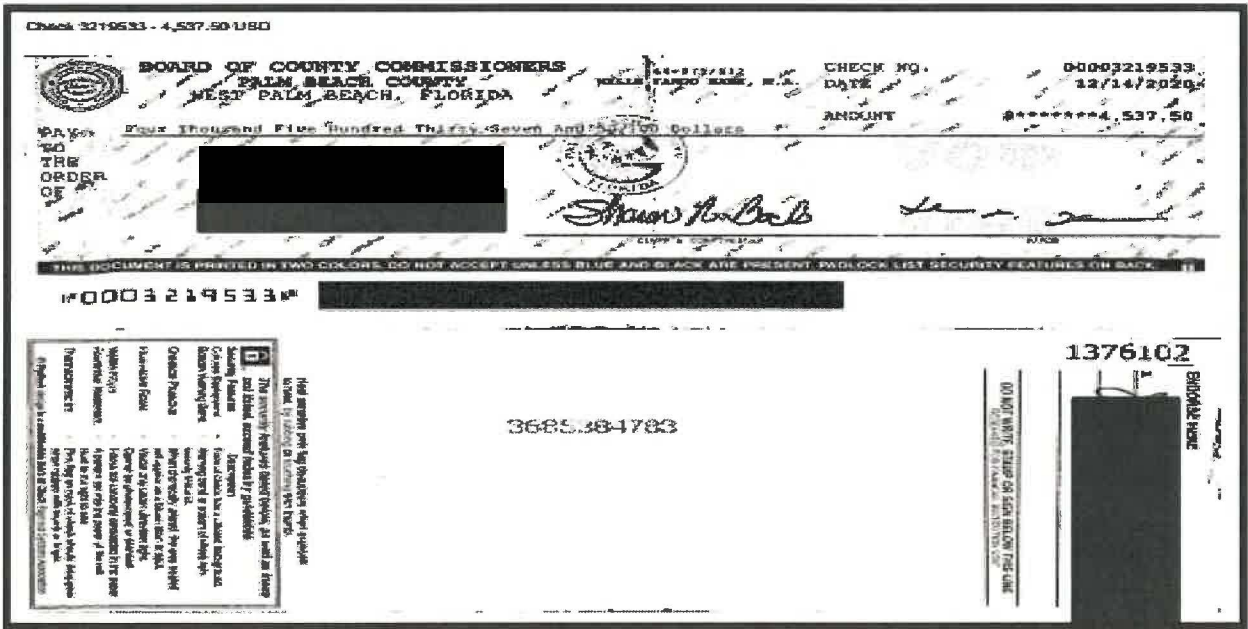
Court Cost \$ 400
(Excludes filing charges, notice to evict, service charge) and/or fees

[Redacted] 10/23/2020
Landlord's Name (Print) Signature Date

Payment to Applicant 2

Although application 49315 and the submitted Balance Statement lists Applicant 2's father as Applicant 1s' landlord and the lease submitted with the application lists Applicant 2's mother and father as Applicant 1's landlord, the County issued check number

00003219533 in the amount of \$4,537.50 payable to "Applicant 2" for Applicant 1's rental assistance.



The OIG reviewed the County's registered vendor registration records for the application and determined that the registered vendor is Applicant 2's mother. The Disbursement Options of the County's vendor registration records indicate that Applicant 2 is listed as the Alias/DBA for the vendor. A Wells Fargo representative advised the OIG that the check was cashed by an individual using an ID belonging to Applicant 2. [The vendor registration will be discussed in greater detail in Allegation 3].

County Advantage database records also show a food assistance payment of \$900.00 directly to the Applicant 1 on November 16, 2020.

Rental Assistance Application 65969

County records show that rental assistance application No. 65969 was submitted to the County on January 23, 2021 on behalf of Applicant 1. For this application, Applicant 1 listed his residential address and mailing address as [redacted] Lake Worth, FL 33467 and his landlord as Applicant 2's mother, with an address of [redacted] no city or state listed), email [redacted] and phone number of [redacted]. The application provided that Applicant 1 was the sole household member.

Applicant 1 listed his monthly rent on application No. 65969 as \$875.00 and requested \$4,938.00 in past due rental assistance, covering the time period from August 3, 2020 to December 3, 2021.⁷

⁷ Although application 65969 states "12/03/2021", this appears to be a typo.

OSCARSS APPLICATION: 65969

Annual Household Income	
Description	
Annual Income Prior to COVID-19 Crisis	[REDACTED]
Checking Account Balance	\$400.00
Current Reduced Monthly Wages	\$20,000.00
Savings Account Balance	\$600.00

Last 2 Months Household Income	
Description	
Annual Income Prior to COVID-19 Crisis	\$2,000.00
Checking Account Balance	
Current Reduced Monthly Wages	\$2,000.00
Savings Account Balance	

Services Requested

Rental Payment

Additional Questions - Rental Assistance

What is the Rent Due Date?	05/01/2020
What is your Landlord's Name?	[REDACTED]
What is your Landlord's Address?	[REDACTED]
What is your Landlord's Email Address?	[REDACTED]
What is your Landlord's Phone Number?	[REDACTED]
What is your Monthly Rent Amount?	\$875.00
Are you currently receiving section 8 or any federal housing subsidies?	No
Did you receive a Rental Late or Eviction Notice?	Yes
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic?	Yes
What is the Rental Past Due Start Date?	05/03/2020
What is the Rental Past Due End Date?	12/03/2021
What is the Rental Past Due Amount Requested?	\$4,938.00

Applicant 1 attested that his crisis was COVID-19 related. In the Declaration of Crisis section of the application, he wrote

I had to leave my job due to having lupus and health issues and my boss was letting guys with Covid work and not telling anybody as soon as I found out a coworker was positive I had been working closely with I quarantined and was let go because I refused to work with Covid positive individuals”

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

I had to leave my job due to having lupus and health issues and my boss was letting guys with Covid work and not telling anybody as soon as I found out a coworker was positive I had been working closely with I quarantined and was let go because I refused to work with Covid positive individuals

The County returned the application to Applicant 1 on January 26, 2021 and requested a new Landlord Balance Statement and lease. The same day, Applicant 1 resubmitted the application.

Residential Lease Agreement Submitted with Application 65969

The Residential Lease submitted with application 65969 is the same lease submitted with applications 49315 and 17939 stating a monthly rent of \$875.00 for November 3, 2019 “and continuing on a year-to-year basis until the Landlord or the Tenant terminates the tenancy.” As with application 49315, the last page of the lease submitted with application 65969 appears to be signed by Applicant 2’s mother and father as landlords, and by Applicant 1 as tenant, with a signature for Applicant 2 whited out and replaced by the printed name of Applicant 1.

Balance Statement Submitted with Application 65969

The Balance Statement submitted with application 65969 reflected past due amounts totaling \$4,939.50, including rent, last fees, and court costs. The Balance Statement appears to contain the signature for Applicant 2's mother, as landlord.

Balance Statement
 completed by Landlord/Property Manager

Tenant's Address: [Redacted]
 6016 North St
 33467

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$4,939.50

Monthly amounts:

Example Month	April 2011	\$ 1000	Late Charges	\$50
Month	August	\$ 875	Late Charges	32.50
Month	September	\$ 875	Late Charges	32.50
Month	October	\$ 875	Late Charges	32.50
Month	November	\$ 875	Late Charges	32.50
Month	December	\$ 875	Late Charges	32.50

Attorney Fees: \$ N/A Court Cost \$ 400

Landlord's Name (Print): [Redacted] Signature: [Redacted] Date: 1/24/2021

(An attempt was made to call the tenant for the rent of \$875, \$22.50 late fee, but no answer check)

The County approved Applicant 1's rental assistance application on January 28, 2021 and processed payment for \$3,630.00 in rental assistance.⁸

Payment to Applicant 2

On January 28, 2021, the County processed Applicant 1's application 65969. Although application 65969 and the submitted Balance Statement lists Applicant 2's mother as Applicant 1's landlord and the lease submitted with the application lists Applicant 2's mother and father as Applicant 1's landlord, on February 3, 2021, the County issued check number 00003225952 in the amount of \$3,630.00 to Applicant 2 for Applicant 1's rental assistance.

Check 00003225952 - \$3,630.00 USD

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

CHECK NO. 00003225952
 DATE 02/03/2021
 ACCOUNT *****9,630.00

PAY TO THE ORDER OF [Redacted]

THREE THOUSAND SIX HUNDRED THIRTY AND 00/100 DOLLARS

00003225952

353310003

1416908


⁸ Community services explained that the amount paid did not match the amount requested because Community Services previously paid the August, 2021 assistance request. Therefore, this payment represents the September, October, November, and December 2021 assistance request, plus late fees.

The OIG reviewed the County’s registered vendor registration records for the application and determined that the registered vendor is Applicant 2’s mother. The Disbursement Options of the County’s vendor registration records indicate that Applicant 2 is listed as the Alias/DBA for the vendor. A Wells Fargo representative advised the OIG that the check was cashed by an individual using an ID belonging to Applicant 2. [The vendor registration will be discussed in greater detail in Allegation 3].


Rental Assistance Application 80248

County records show that on June 27, 2021, rental assistance application No. 80248 was submitted to the County on behalf of Applicant 1. In the application, Applicant 1 listed his residential and mailing address as [REDACTED] Lake Worth, FL 33467 and himself as the sole household member.

In this application, Applicant 1 listed his landlord as Applicant 2’s mother with an address at [REDACTED] (no city or state listed), email address [REDACTED]⁹, and phone number (561) 581-6909. Applicant 1 listed his monthly rent on application 80248 as \$875.00 and requested \$9,341.00 in past due rental assistance, including rent and late fees for the time period January 2021 through October 2021.



OSCARSS APPLICATION: 80248



Additional Questions - Self Attestation

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

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

Additional Questions - Rental Assistance

What is your Landlord's Name? *	[REDACTED]	
What is your Landlord's Address? *	[REDACTED]	
What is your Landlord's Email Address? *	[REDACTED]	
What is your Landlord's Phone Number? *	[REDACTED]	
What is your Monthly Rent Amount? *		\$875.00
Are you currently receiving section 8 or any federal housing subsidies? *	No	
Did you receive a Rental Late or Eviction Notice? *	Yes	
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic? *	Yes	
What is the Rental Months Requested? *	10/2021,09/2021,08/2021,07/2021,06/2021,05/2021,04/2021,03/2021,02/2021,01/2021	
What is the Rental Past Due Amount Requested? *		\$8,750.00
What is the Rental Late Fees Amount Requested? *		\$591.00
What is the Rental Total Amount Requested? *		\$9,341.00
How many Bedrooms are in your Home? *	3	

⁹ Applicant 1 provided a third email address for his landlord—in this application, [REDACTED]

Applicant 1 attested that his crisis was COVID-19 related. In the Declaration of Crisis section of the application, he wrote

I was let go of from my job of 20 yrs because owner was letting covid positive men work and not telling other workers or allowing me to self quarantine after contact and I have lupus..

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

I was let go of from my job of 20 yrs because owner was letting covid positive men work and not telling other workers or allowing me to self quarantine after contact and I have lupus..

Residential Lease Submitted with Application 80248

The lease submitted with application 80248 is different from the leases submitted in Applicant 1's prior applications. A lease listing Applicant 1 as tenant and Applicant 2's mother and father as landlords was attached to the application and stated that the monthly rent was \$875.00 from November 11, 2020 to ending on November 11, 2022.

The last page appears to be signed by tenant Applicant 1 and landlord Applicant 2's mother.

Residential Lease

the payment of rent and performance of all other terms of this Agreement. [Redacted] (Tenant) and [Redacted] (Landlord) are jointly and severally liable for

Clause 2. Identification of Premises
 Subject to the terms and conditions in this Agreement, Landlord [Redacted] hereby leases to Tenant [Redacted] the premises located at [Redacted] together with [Redacted] and the following furnishings and appliances [Redacted]. Rental of the premises also includes [Redacted] and [Redacted] (County).

Clause 3. Limits on Use and Occupancy
 The premises are to be used only as a private residence for Tenant(s) listed in Clause 1 of this Agreement, and their minor children. Occupancy by guests for more than [Redacted] is prohibited without Landlord's written consent and will be considered a breach of this Agreement.

Clause 4. Term of the Tenancy
 The term of the rental will begin on 11/11/2020 and end on 11/11/2022.

Clause 5. Payment of Rent.
 Regular monthly rent: Tenant will pay to Landlord a monthly rent of \$ 875.00, payable in advance on the first day of each month, except when that day falls on a weekend or legal holiday, in which case rent is due on the next business day. Rent will be paid in the following manner unless Landlord designates otherwise:
 Date: Last day of each month or similar to 1st of each month
 Delivery of payment, rent will be paid: [Redacted]
 Form of payment, Landlord will accept payment in these forms: [Redacted]
 cash
 personal check made payable to [Redacted]
 business funds or money order
 credit card

Clause 25. Entire Agreement
 This document constitutes the entire Agreement between the parties, and no promises or representations, other than those contained here and those implied by law, have been made by Landlord or Tenant. Any modifications to this Agreement must be in writing signed by Landlord and Tenant.

[Redacted Signature Area]

WOLF
PL 334022



Balance Statements Submitted with Application 80248

The County returned the application to Applicant 1 on June 30, 2021 and requested a Balance Statement from the landlord. On July 1, 2021, Applicant 1 resubmitted the application. The County returned the application to Applicant 1 on July 8, 2021 and requested the Balance Statement from the landlord. On July 12, 2021, Applicant 1 resubmitted the application.

The County returned the application to Applicant 1 on July 27, 2021 and requested the Balance Statement from the landlord and a complete copy of the rental agreement including all fees.

On July 28, 2021, Applicant 1 resubmitted the application. The County returned the application to Applicant 1 on August 2, 2021 and requested the Balance Statement from the landlord. The same day, Applicant 1 called the County reviewer and provided the landlord's email address, [REDACTED] and requested the Balance Statement link be re-sent to the landlord. On August 6, 2021, the County reviewer resent the Balance Statement link, and later that day, a new the Balance Statement was submitted.

On August 23, 2021, a person purporting to be Applicant 1's landlord called the County reviewer requesting an update on the application and asked to be contacted at telephone number [REDACTED]. On August 27, 2021 the County reviewer resent the Balance Statement link and later that day, a new Balance Statement was submitted to the County in support of application No. 80248. The new Balance Statement listed the past due amount as \$10,659.50, which included rent and late fees from January to August 2021.

		Landlord's Balance Statement			
Tenants Name: [REDACTED] Tenants Address: [REDACTED]		Vendor Code: V50000018493 Vendor Name: [REDACTED] Vendor DBA: [REDACTED] Vendor Address: [REDACTED]			Lake Worth FL 33460 6130
Month		Rent Due	Late Fee	Legal Fee	Total Due
Month 1	January 2021	\$1,000.00	\$32.00	\$400.00	\$1,432.00
Month 2	February 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 3	March 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 4	April 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 5	May 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 6	June 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 7	July 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 8	August 2021	\$1,000.00	\$32.00	\$0.00	\$1,032.00
Month 9	September 2021	\$1,000.00	\$0.00	\$0.00	\$1,000.00
Month 10	October 2021	\$1,000.00	\$0.00	\$0.00	\$1,000.00
Grand Total:					\$10,659.50

Palm Beach County COMMUNITY SERVICES

Landlord's Balance Statement

PALM BEACH COUNTY FLORIDA

- 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 month's listed on this request and/or any future month's rent requested by my tenant 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.
- I certify that the tenant and I (the Landlord) are in agreement on lease status.

Electronically Signed By _____ Date 08/27/2021

The County returned the application to Applicant 1 on August 31 because the lease and Balance Statement rent amounts did not match - the monthly rent on the lease was \$875.00 per month and on the Balance Statement the amount was \$1,000.00 per month.

On September 1, 2021, another Balance Statement was submitted. The Balance Statements were purportedly signed electronically signed by Applicant 2's mother, as landlord.

On September 14, 2021, Applicant 1 called the County reviewer asking about the status of the application and claiming his landlord wanted to know the status of the review.

On September 21, 2021, the County notified Applicant 1 that his application No. 80248 had been denied due to "No proof of mobile home ownership." The same day, Applicant 1 electronically submitted an appeal to his denied application No. 80248. Applicant 1 wrote the following reason for the appeal:

I completely did everything I was told by your staff, also got help at the library to filled out my paper work I was told by many off your staff that everything was approved now you guys selling no prove of ownership I'm sorry but no one ask the owner to show her paper work first I was told not to worry and now I'm facing to be homeless because you guys didn't ask for the information that was missing how fair is that.

On October 10, 2021, the County denied the appeal, citing that Applicant 1 could not provide the requested proof of ownership of the trailer and landlord address, and there was no proof that property owner, Applicant 2's mother, would be the recipient of the landlord payment.

OIG Interview of Applicant 2's mother

On September 21, 2022, the OIG interviewed Applicant 2's mother at her residence at _____ Lake Worth FL 33467. She stated she has lived at the address for 20 years. The residence is a mobile home located in the _____ Community.

Applicant 2's mother stated that her phone number is [REDACTED] and her husband Applicant 2's father's phone number is [REDACTED]. She stated that her email address is [REDACTED] but she rarely uses it and her husband did not have an email address. She stated that she does not know anything about any rental and food assistance programs. Applicant 2's mother told the OIG that she has never registered to be a County vendor and never received money from the County for rental or food assistance, including as a landlord.

Applicant 2's mother stated that her daughter, Applicant 2, and her daughter's boyfriend, Applicant 1, lived with her and her husband at [REDACTED] for three years until they were evicted at the beginning of 2020, before the pandemic. Applicant 2's mother stated that even though Applicant 2 and Applicant 1 lived with them, they did not have a lease and did not pay rent. Applicant 2's mother said she believed the eviction specified that Applicant 2 and Applicant 1 could not return to [REDACTED] for seven years, and they have not returned since.

OIG Interview of Applicant 2's Father

Applicant 2's father stated he did not know how Applicant 2 and Applicant 1 were doing, he had not heard from them in a while, and did not know where they were. Applicant 2's father thereafter refused to be interviewed by the OIG.

On a later occasion the OIG attempted to interview Applicant 2's father and ask follow-up questions of Applicant 2's mother. Neither would consent to interview at that time or thereafter.

OIG Attempts to Interview Applicant 1

The OIG attempted on multiple occasions via emails, emails to texts, and telephone to interview Applicant 1. He did not respond to those requests.

OIG Attempts to Interview Applicant 2

The OIG attempted on multiple occasions via emails, emails to text, and telephone to interview Applicant 2. She did not respond to any of those attempts.

Conclusion

Applicant 1 submitted applications 17939, 49315, 65969, 80248 to the County. On each occasion, he attested that he provided accurate information to the County. We find that Applicant 1 submitted applications with false information, including his residential address at the time of the applications, the name of his landlord, and his landlord's contact information, along with fabricated leases agreements.

Although Applicant 1 had lived at [REDACTED] Lake Worth, FL 33467, he never had a rental agreement with Applicant 2's mother or father, never paid rent to occupy the location, and had in fact, been evicted from the property six months prior to the submission of his first rental assistance application.

Additionally, Applicant 2's mother told the OIG she was unaware of the rental and food assistance program and provided the OIG with cell phone numbers for her and her husband and an email address for herself that differed from the landlord contact information in Applicant 1's applications. She stated that Applicant 2's father did not use email. She also stated that she had lived at [REDACTED] Lake Worth, FL 33476 for 20 years, and not at the [REDACTED] address that Applicant 1 provided as his landlord(s)' address in applications 49315, and 80248.

As a result of the false information Applicant 1 provided in his applications, the County issued a total of \$9,067.50 in grant funding.

The allegation that Applicant 1 provided false information in his assistance applications, which resulted in improper grant funding from County programs is **supported**.

Allegation (2):

Applicant 2 provided false information to the County in her assistance applications, which resulted in improper grant funding from County programs.

Governing Directives:

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

Finding:

The information obtained **supports** the allegation.

Applicant 2 submitted the following applications under the County's CARES Act and ERA Programs:

Application No.	Application Submission Date	Date of County Payment	Type of Assistance	Amount Paid	Approved
22402	7/29/2020	N/A	Food	N/A	No
		N/A	Rental	N/A	No
39412	11/19/2020	12/15/2020	Food	\$ 1,300.00	Yes
Total				\$ 1,300.00	

Rental and Food Assistance Application 22402

County records show on July 29, 2020, rental and food assistance application No. 22402 was submitted to the County on behalf of Applicant 2. In the application, Applicant 2 listed her residential address and mailing address as [REDACTED] Lake Worth, FL 33460¹⁰ and a minor child and herself as household members.

In her application, Applicant 2 listed her landlord as Applicant 1, address [REDACTED] [REDACTED] (no city or state listed). Applicant 2 listed her monthly rent on application No. 22402 as \$650.00 and requested \$2,448.00 in past due rental assistance, from May 3 to July 3, 2020. Applicant 2 also requested food assistance in this application.

Annual Household Income	
Description	[REDACTED]
Annual Income Prior to COVID-19 Crisis	\$24,000.00
Checking Account Balance	\$100.00

Last 2 Months Household Income	
Description	[REDACTED]
Annual Income Prior to COVID-19 Crisis	
Checking Account Balance	

Services Requested	
<input checked="" type="checkbox"/> Rental Payment	
<input checked="" type="checkbox"/> Food	

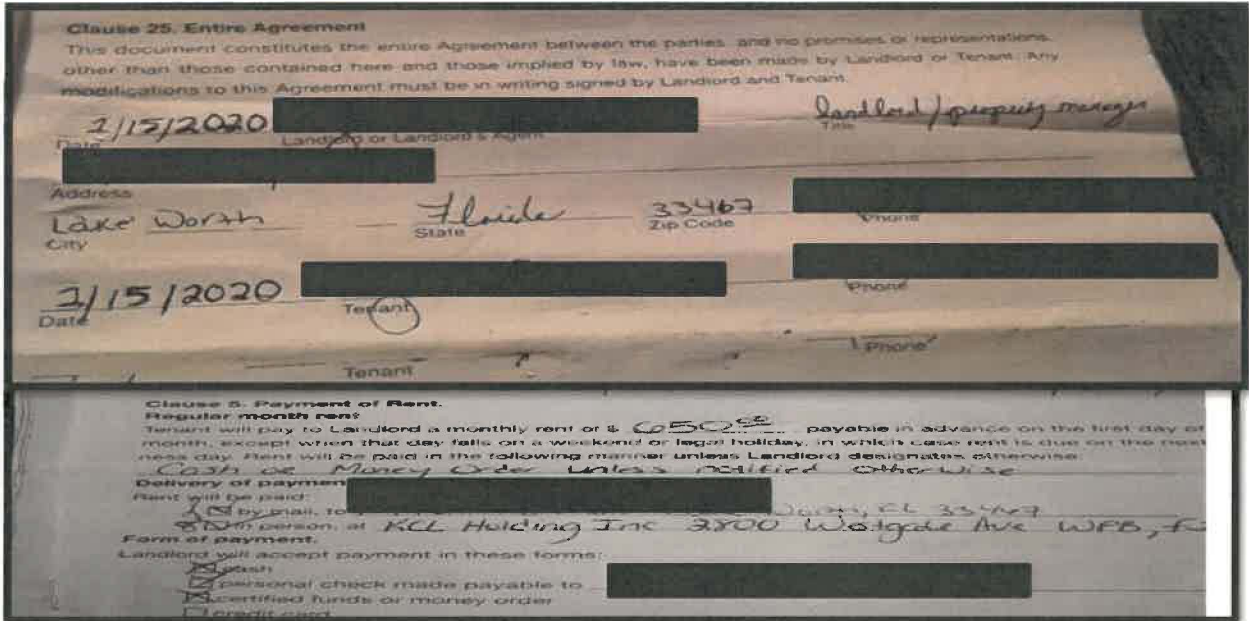
Additional Questions - Rental Assistance	
What is the Rent Due Date?	05/01/2020
What is your Landlord's Name?	[REDACTED]
What is your Landlord's Address?	[REDACTED]
What is your Landlord's Email Address?	[REDACTED]
What is your Landlord's Phone Number?	[REDACTED]
What is your Monthly Rent Amount?	\$650.00
Are you currently receiving section 8 or any federal housing subsidies?	No
Did you receive a Rental Late or Eviction Notice?	Yes
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic?	Yes
What is the Rental Past Due Start Date?	05/03/2020
What is the Rental Past Due End Date?	07/03/2020
What is the Rental Past Due Amount Requested?	\$2,448.00

Applicant 2 left the "Declaration of Crisis" section of the application blank.

¹⁰ Applicant 1 used this same address, 2012 Park Street, Lake Worth, FL 33460, as his mailing address in his own assistance applications 17939 and 49315 and as his landlord(s)' address in applications 49315, 65969 and 80248.

Residential Lease Agreement Submitted with Application 22402

The Residential Lease attached to the application listed Applicant 2 as the tenant and Applicant 1 as the landlord and provided that that the monthly rent was \$650.00



commencing January 15, 2020 and ending February 15 of a year that could not be discerned from the documentation provided to the OIG.¹¹ The lease stated that the leased property address was located at [redacted] West Palm Beach, FL 33417, which differed from the rental address identified in the assistance application. The last page of the submitted lease was purportedly signed by Applicant 1 and Applicant 2 on January 15, 2020.

Balance Statement Submitted with Application 22402

The Landlord Balance Statement attached to application No. 49315 listed [redacted] West Palm Beach, FL 33417, as the rental address and the past due amount as \$2,447.50, to include rent and late fees for May 2020 to July 2020, plus court costs. The Balance Statement said the rent for March and April 2020 had been paid.

¹¹ The only image of the lease retained by Community Services is cut off and does not denote the year that this lease purportedly ended.

Tenants Name (Print) [Redacted]

Tenants Name (Print) [Redacted]

Address: [Redacted] 3347

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 2,447.50

Monthly arrears:

Example Month	April 2019	\$ 1000	Late Charges	\$50
Month	July 2020	\$ 650	Late Charges	32.50
Month	June 2020	\$ 650	Late Charges	32.50
Month	May 2020	\$ 650	Late Charges	32.50
(paid) Month	April 2020	\$ 650	Late Charges	N/A
(paid) Month	March 2020	\$ 650	Late Charges	N/A

Attorney Fees: \$ 170 (Self-Inv) Court Cost \$ 400

Landlords Name (Print) [Redacted] Signature [Redacted] Date 03/05/2020

On July 29, 2020 and August 25, 2020, the County requested that Applicant 2 upload proof of COVID-19 crisis and proof of an active unemployment claim. On September 2, September 8, and September 10, 2020, the County requested that Applicant 2 upload her entire 2019 tax return and an unemployment claim document. On September 14, 2020, the County again requested that Applicant 2 upload proof of COVID-19 crisis documents, and later that day the County notified Applicant 2 that her application had been denied due to missing documents.

Food Assistance Application 39412

County records show on November 19, 2020, the County received food assistance application 39412 on behalf of Applicant 2. In the application, Applicant 2 listed her address as [Redacted], Lake Worth, FL 33460, and listed herself, her daughter, and her mother, Applicant 2's mother, as household members.

In this application, Applicant 2 attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the application, she wrote

I had my hours reduced to 4 hours a week at end of March then in apr I had been taken off schedule completely, much of my income was also taking care a cpl

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

I had my hours reduced to 4 hours a week at end of March then in apr I had been taken off schedule completely, much of my income was also taking care a cpl people at home and cleaning houses and I couldn't do anything after we were told to social distance and nobody could do work like that.

people at home and cleaning houses and I couldn't do anything after we were told to social distance and nobody could do work like that.

The County returned the application to Applicant 2 on November 20, 2020 and requested she upload proof of COVID-19 crisis and adequate unemployment documents by end of November 24, 2020. On November 20, 2020, Applicant 2 resubmitted the application, and the County returned it for the same reasons as before. Applicant 2 resubmitted the application, and the County again returned it noting the same reasons.

On December 2, 2020, Applicant 2 resubmitted the application, and on December 4, 2020 the County processed the application. On December 15, 2020, the County approved food assistance and mailed a food card to Applicant 2 at [REDACTED] Lake Worth, FL 33460. The entire funded food assistance for that request was \$1,300.00, and was used from March 1 through April 26, 2021.

OIG Interview of Applicant 2's mother

On September 21, 2022, the OIG interviewed Applicant 2's mother at her residence at [REDACTED] Lake Worth FL 33467. Applicant 2's mother told the OIG that she has lived at that address for 20 years, including on July 20, 2020, when food assistance application 39412 was submitted to the County, and that she is unaware of and has never participated in County rental and food assistance programs.

OIG Attempts to Interview Applicant 2

Several attempts, emails, emails to text and phone calls, were made to interview Applicant 2. She did not respond to any of those attempts.

Conclusion

Applicant 2 submitted assistance applications 22402 and 39412. On each occasion, she attested that she provided accurate information to the County.

Based upon our review of records submitted in support of those applications and our interview of Applicant 2's mother, we found that:

- Application 22042 contained a lease with inaccurate landlord information and assistance resident address. Applicant 1, the listed landlord, was not the true landlord and his address was not accurately listed.
- Application 39412 contained false information in the Household Details, Declaration of Crisis section. In addition, Applicant 2's mother was not a household member of Applicant 2.

As a result of the false information provided to the County in support of food assistance application 39412, the County issued \$1,300.00 in grant funding in the form of a food assistance debit card.

The allegation that Applicant 2 provided false information in her food assistance application, which resulted in improper grant funding from a County program is **supported**.

Allegation (3):

Applicant 2 provided false vendor registration information to the County in order to register as Applicant 1' landlord, which resulted in the issuance of rental assistance checks to Applicant 2.

Governing Directives:

Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program application and program guidelines; Palm Beach County Vendor Memorandum of Agreement.

Finding:

The information obtained **supports** the allegation.

Landlord Registration as a County Vendor

The County's Advantage vendor payment system records show that effective November, 25, 2020, Applicant 2's mother was activated as a vendor for the purposes of receiving rental assistance.

According to the County's Memorandum of Agreement for vendors, in order to register as a vendor with the County, a vendor/landlord must electronically accept the terms of a Memorandum of Agreement (MOA) certifying and warranting that the person is authorized to provide all the vendor information requested and to enter into the MOA with the County. Furthermore, the MOA provides:

By submitting this electronic vendor registration, you hereby agree:

...

2. To provide **accurate, complete**, and current vendor information that can be conclusively relied upon by the County... [Emphasis added]

County Records - County Vendor/Landlord Applicant 2's mother with Alias/DBA Applicant 2

Information from the County's Advantage vendor payment system for Applicant 2's mother is as follows:

- Vendor ID: VS0000018493
- Legal Business Name: Applicant 2's mother
- Alias/DBA: Applicant 2
- Contact(s): Applicant 2's mother [REDACTED]

- Address(es): [REDACTED] Lake Worth 33467 and [REDACTED] Lake Worth 33460
- Email(s): [REDACTED]

Vendor Information

Vendor ID: VS0000018493

Legal Business Name: [REDACTED] Alias/DBA: [REDACTED]

Address(es): [REDACTED] Contact(s): [REDACTED]

Email(s): [REDACTED] WebSite: [REDACTED]

Commodity / Services	
97139	Mobile Home Rental or Lease
97164	Residential Space Rental or Lease

Vendor/Customer: VS0000018493 Legal Name: [REDACTED] Vendor Active Status: Inactive Customer Active Status: Inactive

From 1 to 1 of 1 First Prev Next Last Attachments

Save Undo Delete Insert Copy Paste Search

General Info

Vendor/Customer: VS0000018493 Restrict Use by Department:

Legal Name: [REDACTED] Miscellaneous Account:

Alias/DBA: [REDACTED] Internal Account:

Vendor Active Status: Complete Third Party Only:

Vendor Approval Status: Inactive Third Party Vendor:

Customer Active Status: Incomplete Third Party Customer:

Customer Approval Status: Incomplete Inventory Customer:

Location Name: [REDACTED] Healthcare Provider:

First Name: [REDACTED] Never Archive:

Middle Name: [REDACTED] Restrict YES Access: No

Last Name: [REDACTED] Continue - No New Business:

Company Name: [REDACTED] Prevent MA Reference:

Vendor Performance Rating: [REDACTED] PunchOut Enabled:

EDI Enabled: Re-PunchOut Enabled:

Electronic Order Enabled: W-9 Received:

W-9 Received Date: [REDACTED] W-9 Received Date: [REDACTED]

W-9 Received Date: [REDACTED] W-9 Received Date: [REDACTED]

Accepts Credit Cards: Active From: 11/25/2020

Active To: [REDACTED] Active To: [REDACTED]

Last Usage Date: 08/23/2021 Last Usage Date: [REDACTED]

Department: 080 Department: [REDACTED]

Unit: [REDACTED] Unit: [REDACTED]

Applicant 2's mother was registered as a vendor on November 19, 2020, and the County approved and activated the vendor registration on November 25, 2020. The person(s) who registered Applicant 2's mother listed her addresses as [REDACTED] Lake Worth 33467 [REDACTED] and [REDACTED] Lake Worth, FL 33460.

Additionally, the registration specified the Alias/DBA of Applicant 2 as the vendor payee. Advantage and County Clerks' records revealed two checks made out to Applicant 2 under this vendor registration for Applicant 1's two processed rental assistance applications:

- **Application No. 49315**, Check number check number 00003219533 on December 14, 2020 in the amount of \$4,537.50 for rent from April 1 through August 31, 2020.

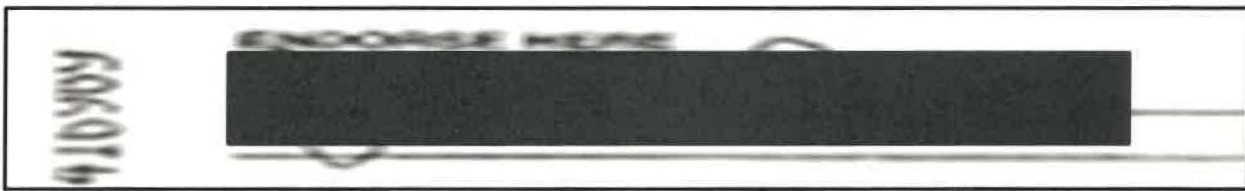
- **Application No. 65969**, Check number 00003225952 on February 3, 2021 in the amount of \$3,630.00 for rent from September 1, 2020 through December 31, 2020.

Both checks are endorsed but have what appear to be different signatures. Check number 3225952 is endorsed with a signature that is similar to Applicant 2's driver's license signature. The endorsement on Check number 3219533 appears to be different than Applicant 2's driver's license signature.

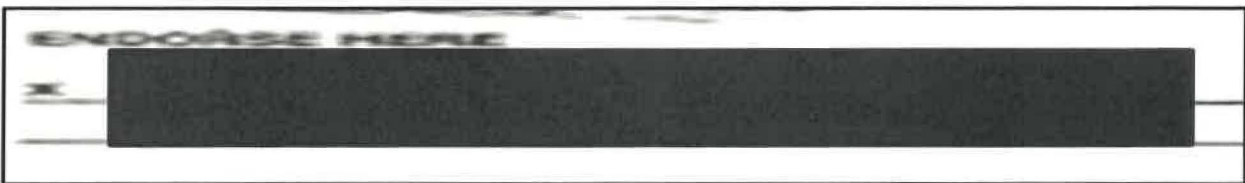
Applicant 2 driver's license signature:



Check 3225952 endorsement:



Check 3219533 endorsement:




OIG Analysis of Wells Fargo Bank Records

Although application 49315 and the submitted Balance Statement lists Applicant 2's father as Applicant 1's landlord and the lease submitted with the application lists Applicant 2's mother and father as Applicant 1's landlord, the County issued check number 00003219533 in the amount of \$4,537.50 to Applicant 2 for Applicant 1's rental assistance. The OIG obtained records from Wells Fargo bank which detail the cashing of check number 00003219533. According to a Wells Fargo representative, the information contained on the Applicant 2 driver's license used to cash check number 00003219533 at Wells Fargo on December 23, 2020, was consistent with the driver's license submitted with Applicant 2's own rental assistance and food assistance applications.

Additionally, although application 65969 and the submitted Balance Statement lists Applicant 2's mother as Applicant 1's landlord and the lease submitted with the application

lists Applicant 2’s mother and father as Applicant 1’s landlord, on February 3, 2021, the County issued check number 00003225952 in the amount of \$3,630.00 to Applicant 2 for Applicant 1’s rental assistance. According to a Wells Fargo representative, the information contained on the driver’s license used to cash check number 00003219533 at Wells Fargo in the amount of \$3,630.00 on February 8, 2021, was consistent with the



Summons and Subpoenas Department
 PO Box 1415 MAC # D111-016
 Charlotte, NC 28201
 Voice: 480-724-2000

BUSINESS RECORDS DECLARATION

I, **Brittany Washington**, am over the age of eighteen and I declare that I am employed by Wells Fargo Bank, N.A. (“Wells Fargo”) in the Summons and Subpoenas Department and am a duly authorized and qualified witness to certify the authenticity of the attached documents and/or information produced pursuant to the legal order. Wells Fargo reserves the right to designate another Custodian as it deems appropriate in the event an actual appearance is required concerning the records produced. I certify that the attached records:

- A) Were prepared by personnel of Wells Fargo in the ordinary course of business at or near the time of the acts, conditions or events described in the records; and
- B) It was the ordinary course of business for Wells Fargo employees or representatives with knowledge of the act, event, or condition recorded to make the record or transmit the information therein to be included in such record.
- C) The records attached are true and correct copies of the business records as maintained by Wells Fargo.

The records produced are described as follows:

Document Type	Account #	Paper Count	Total Copies
Teller Transactions Check number 3219533 in the amount of 4,537.50 was cashed on 12/23/2020 using identification number [REDACTED] Image of the identification is available. Unable to determine name associated with the identification.	XXXXXXXXXX6822	0	0
SARS Note to Client Unable to locate SARS.		0	0
Teller Transactions Check number 3225952 in the amount of 3630.00 was cashed on 02/08/2021 using identification [REDACTED] [REDACTED] is available. Unable to determine the name associated with the identification.	XXXXXXXXXX6822	0	0

driver’s license submitted with Applicant 2’s own rental assistance and food assistance applications.

OIG Interview of Applicant 2’s mother

Applicant 2’s mother provided her phone number and email address to the OIG. The vendor registration phone [REDACTED] does not belong to Applicant 2’s mother. The email addresses in the vendor application do not belong to Applicant 2’s mother.

OIG Conclusion

Applicant 2’s mother had no knowledge of the County assistance programs; she never registered to be a County vendor and never received money from the County for rental

or food assistance. We find that her registration as a County vendor was without Applicant 2's mother's knowledge and completed by her daughter, Applicant 2, for the purpose of posing as a landlord for Applicant 1's assistance applications.

Applicant 2's mother's true phone number and email address did not match the landlord information provided in the applications and in the County vendor information. However, Applicant 2 used her driver's license as identification when cashing the County assistance checks; the same identification she provided in her applications for assistance and the County vendor registration Alias/DBA disbursement information.

As a result of the false information Applicant 2 provided in the County's vendor registration, the County issued a total of \$9,067.50 in grant funds to her in two checks, one in the amount of \$4,537.50 and the other in the amount of \$3,630.00.

The allegation that Applicant 2 provided false information to the County in a vendor registration, which resulted in improper grant funding from County programs is **supported**.

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Identified Costs: \$10,367.50

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

The OIG recommends the County seek reimbursement of **\$10,367.50** of inappropriately 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 response is as follows:

The County concurs with the IG recommendation included in Investigative Report 2022-0016. The Community Services Department will seek reimbursement for \$10,367.50 issued to the subject(s) named in this investigation.

RESPONSE FROM SUBJECT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Applicant 1 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. Applicant 1 did not submit a response.

RESPONSE FROM SUBJECT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Applicant 2 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. Applicant 2 did not submit a response.

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