

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



"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

2023-0005

False Information on Palm Beach County Rental Assistance Program Applications - Wellington March 24, 2025



OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

2023-0005 March 24, 2025



Inspector General Accredited

"Enhancing Public Trust in Government"

FALSE INFORMATION ON PALM BEACH COUNTY RENTAL ASSISTANCE PROGRAM APPLICATIONS - WELLINGTON

SUMMARY

WHAT WE DID

The Palm Beach County (County) Office of Inspector General (OIG) received an complaint anonymous concerning (Applicant)'s applications to the County Coronavirus Aid, Relief and Economic Security (CARES) Act -Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program and Emergency Rental Assistance Program (ERA). The complaint alleged Applicant false employment submitted documentation with her applications in order to obtain assistance.

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

Allegation (1): Applicant provided false information in her assistance applications, which resulted in improper grant funding from County programs.

Our office reviewed Applicant's assistance applications, supporting documents, and the program guidelines. We also interviewed individuals with knowledge of information relevant to Applicant's

assistance applications, including Applicant and her former employer.

WHAT WE FOUND

Allegation (1) is supported. We found that Applicant submitted fabricated documents to the County in support of seven (7) assistance applications.

As a result of her actions, the County approved five applications and issued a total of \$12,038.22 in funding, which we find to be Identified Costs.¹ The County also denied two of Applicant's applications.

We found sufficient information to warrant referring our findings to law enforcement (with a 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 referral 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.

¹ Identified costs are cost that have been identified as dollars that have the potential of being returned to the entity to offset taxpayer burden.

WHAT WE RECOMMEND

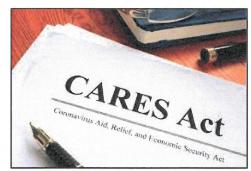
We make one recommendation; that the County seek reimbursement of \$12,038.22 in issued funds.

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 \$8.328 billion, with \$261,174,832 of that total provided to Palm Beach County.

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

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

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

Emergency Rental Assistance Program

On March 9, 2021, under the authority of the U.S. Department of Treasury Emergency Rental Assistance Program ERA-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 [Emphasis added];
- 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 online applications electronically on the Community Services Online System for Community Access to Resources and Social Services (OSCARSS). OSCARSS allowed applicants to upload certain supporting documentation, including identification, employment information, 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 digitally checking a box next to each one. Applicants had to check each box every time they submitted or resubmitted an application.

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

I further certify that I have read² 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]

² In the version of this acknowledgment for applications 28542, 48991, and 65865, there was a comma after the word "read." The rest of this acknowledgment was identical for applications 70437, 93525, 105504, and 108945.

The final page of the application required the applicant's electronic signature and date of submittal.

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 rental assistance funds directly to the applicant's landlord, paid utility assistance directly to the utility provider, and issued food assistance to the applicant via a pre-paid debit card. 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.

Property Records for Wellington, FL 33414
Each of Applicant's assistance applications listed her rental address as Wellington, FL 33414. According to the Palm Beach County Property Appraiser's Office, Wellington, FL, is the address of a four-unit residential property. The OIG learned from an interview with the Property Appraiser that this property includes The Palm Beach County Property Appraiser's online database shows that
from September 2018 until February 2022, at which time they sold it to owned the property at the time of each of Applicant's rental assistance applications.
Sai Property Management LLC
The OIG contacted during the course of this investigation stated that Ravi [Mohanka] from Sai Property Management LLC managed on his behalf.

Sai Property Management LLC's Articles of Organization were filed with the Florida Secretary of State on January 22, 2015. Ranjana Agrawal was listed as the registered agent and sole manager at that time. In December 2015, the Articles were amended to list the managers as Ranjana Agrawal and Ravi Mohanka.

SaiNaam Realty & Investment, LLC

Applicant listed SaiNaam Realty & Investment, LLC as her landlord in her applications.

SaiNaam Realty & Investment, LLC Articles of Organization were filed with the Florida Secretary of State on August 30, 2016. Ravi Mohanka was listed as the sole manager at that time. In November 2016, the Articles were amended to list the managers as Ravi Mohanka and Ranjana Agrawal.

The OIG interviewed Mr. Mohanka. Mr. Mohanka stated that SaiNaam Realty & Investment, LLC purchases properties³ and Sai Property Management manages them.

ALLEGATIONS AND FINDINGS

Allegation (1):

Applicant 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 (ERA) application and program guidelines.

Finding:

The information obtained supports the allegation.

Rental Assistance Application 28542

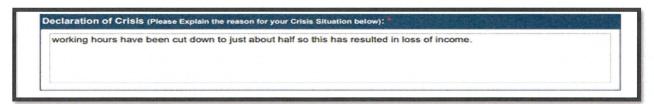
County records show Applicant electronically signed and submitted rental assistance application 28542 to the County on August 17, 2020. Applicant listed her address as Wellington, FL and her landlord as SaiNaam Realty. She listed her monthly rent payment as \$1,500.00, and requested assistance for August of 2020.

The County returned the application on August 18, 2020 and requested additional information, including a current rental lease agreement and proof of Covid-19 crisis in the form of a paystub dating between February 1st and March 13th, 2020. Applicant resubmitted her application that same date. The County returned the application again on August 28, 2020 and requested a signed and dated landlord balance statement. The County processed the application on October 19, 2020.

³ SaiNaam Realty & Investment, LLC was not the owner of Applicant's rental.

What is the Rent Due Date? *	08/01/2020
What is your Landlord's Name? *	SaiNaam Realty
What is your Landlord's Address? *	9100 Belvedere Rd #114, Royal palm beach, FL 33411
What is your Landlord's Email Address? *	PM@saipropertymgmt.com
What is your Landlord's Phone Number? *	561-784-8353
What is your Monthly Rent Amount? *	\$1,500.00
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? *	
What is the Rental Past Due Start Date? *	08/01/2020
What is the Rental Past Due End Date? *	08/03/2020
What is the Rental Past Due Amount Requested? *	\$1,500.00

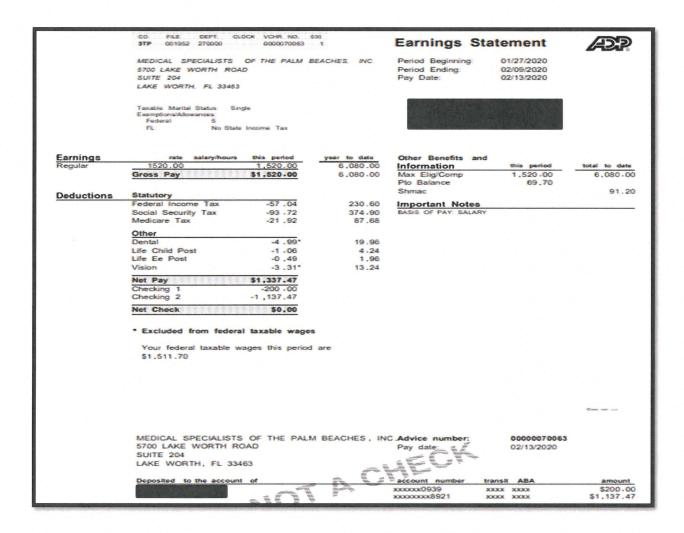
Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the application, she wrote, "working hours have been cut down to just about half so this has resulted in loss of income." [Emphasis added]



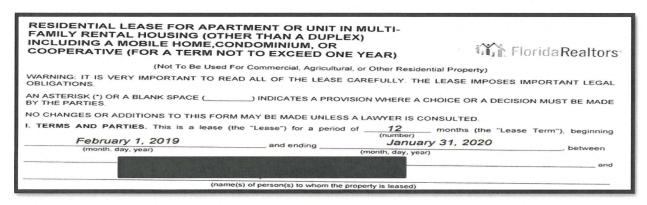
The supporting documents Applicant submitted with this application included a letter purporting to be from Medical Specialists of the Palm Beaches, Inc., a lease, a lease addendum, and two Earnings Statements. The employer letter was purportedly signed on August 12, 2020 by Kelly King, Office Manager. The letter stated that due to COVID-19, Applicant's hours and income had been reduced.



The Earnings Statements Applicant submitted had pay dates of February 13, 2020 and March 26, 2020, and identified her employer as Medical Specialists of the Palm Beaches, Inc. The February 13, 2020 Earnings Statement showed a gross pay of \$1,520.00 with no regular salary/hours indicated.

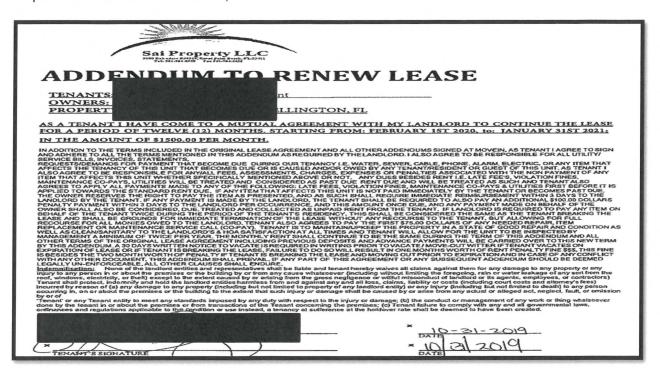


Applicant submitted her lease covering a period of 12 months, beginning on February 1, 2019 and ending January 31, 2020. Applicant is listed as one of two listed tenants. The lease is signed by the landlord but not by the tenants.



	01/15/2019	
Land	Date	
Lanc	01/15/2019	
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Tenant's Signature	Date	
Tenant's Signature	Date	

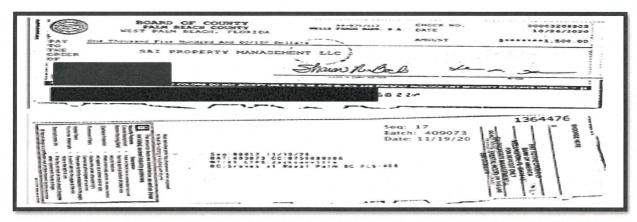
Applicant submitted an Addendum to Renew Lease covering a period of 12 months, beginning on February 1, 2020 and ending January 31, 2021. Applicant is again a listed tenant. The addendum was signed by the two tenants and as the owner's representative on October 31, 2019.



Payment to Sai Property Management LLC

On October 26, 2020, the Clerk and Comptroller issued check number 00003208905 in the amount of \$1,500.00 to Sai Property Management LLC⁴ for rental assistance for application 28542 for Applicant.

⁴ Although Applicant's application listed SaiNaam Realty as her landlord, the County issued a check to Sai Property Management, LLC, a different entity, because Sai Property Management, LLC, appears on this application's Landlord Balance Statement.



Food Assistance Application 48991

County records show that Applicant electronically signed and submitted food assistance application number 48991 on November 12, 2020. Applicant listed her address as Wellington, Fl. 33414. Per the OSCARSS review log,

Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the form, she wrote "working hours have been cut down to just about half so this has resulted in loss of income". [Emphasis added]



Applicant submitted with food assistance application 48991 the same employee letter and Earnings Statements that she had submitted with application 28542. The County processed the application on November 14, 2020 and sent a food assistance card that allowed her to access \$1,300.00⁵ in food assistance.

Rental Assistance Application 65865

County records show Applicant electronically signed and submitted rental assistance application 65865 to the County on January 25, 2021. Applicant listed her address as Vellington, FL, and her landlord as SaiNaam Realty. She listed her monthly rent payment as \$1,500.00, and requested assistance of \$3,000.00 for January and February 2021.

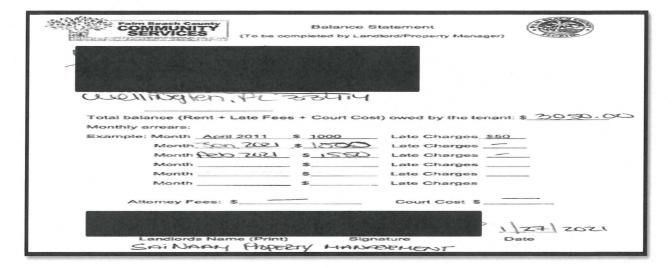
The County returned the application to Applicant on January 27, 2021 and requested an updated lease or lease addendum, and an updated Balance Statement. Applicant resubmitted the application that same date. The County processed the application on February 2, 2021.

⁵ The food assistance card was originally loaded with \$800, and then reloaded with \$500 in benefits in December 2020.

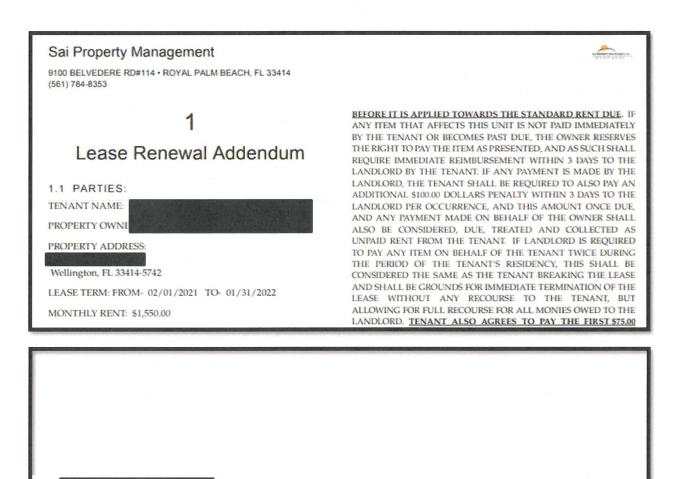
Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the application, she wrote, "working hours have been cut down to just about half so this has resulted in loss of income. As well as testing positive for COVID and having to miss 3 weeks of work." [Emphasis added]



The landlord Balance Statement submitted with this application showed a total due of \$3,050.00.



Applicant submitted the same employment letter, lease, Addendum to Renew Lease, and Earnings Statements that Applicant submitted with application 28542. She also submitted a new Addendum to Renew Lease dated February 1, 2021 to January 31, 2022. Applicant is one of two listed tenants; only the other tenant signed the addendum.



Payment to Sai Property Management LLC

Lessee

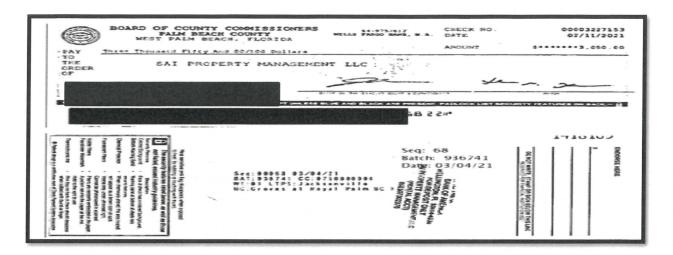
On February 11, 2021, the County issued check number 00003227153 in the amount of \$3,050.00 to Sai Property Management LLC⁶ for rental assistance for Applicant.

IP Address: 172.58.12.151

11/19/2020 05:04pm EST

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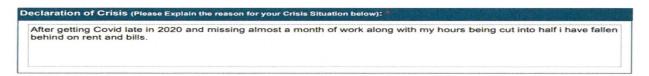
⁶ Although Applicant's application listed SaiNaam Realty as her landlord, the County issued a check to Sai Property Management, LLC, a different entity, because Sai Property Management, LLC, appears on this application's Landlord Balance Statement.



Rental Assistance Application 70437

County records show that Applicant electronically signed and submitted rental assistance application 70437 to the County on March 12, 2021. Applicant listed her address as Wellington, FL, and her landlord as SaiNaam Realty and Investment, Inc. She listed her monthly rent payment as \$1,550.00, and requested assistance of \$3,100.00 for April⁷ and May 2021.

Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the application, she wrote: "After getting Covid late in 2020 and missing almost a month of work along with my hours being cut into half i (sic) have fallen behind on rent and bills." [Emphasis added]



The County returned the application to Applicant on March 24, 2021 and requested additional information, including her previous lease and an additional paystub for the month of March. Applicant resubmitted her application on March 27, 2021. The County again returned the application on March 29, 2021 and requested additional information, including a letter from Applicant's employer regarding her reduction in hours. Applicant resubmitted her application that same date. On March 30, 2021, the County again returned the application for additional information. Applicant resubmitted her application on March 31, 2021. The County again returned the application on April 1, 2021 requesting that Applicant sign and initial her original lease, and Applicant resubmitted it that same day. The County processed the application on April 16, 2021.

The supporting documents Applicant submitted with this application included a lease agreement, landlord Balance Statement, and two employment letters purporting to be from Medical Specialists of the Palm Beaches, Inc. The landlord Balance Statement signed by Lenise Hewling and submitted with this application showed a total due of \$1,650.00 for April 2021, including a \$100.00 late fee. Applicant submitted with application 70437 the employment letter purportedly signed by Kelly King dated August 12, 2020 that she had submitted with her previous applications, along with an employment letter dated March 29, 2021, purportedly signed by Dr. Robert Levin. The March 29, 2021 employee letter stated that due to COVID-19, Applicant's hours were reduced from 40 to about 25 hours per week.



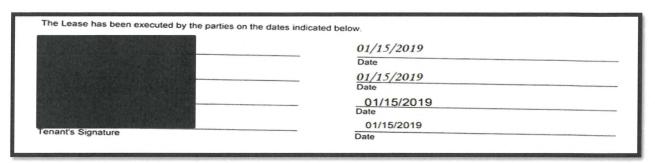
Applicant also submitted two Earning Statements⁸ covering two week pay periods with this application; one with pay date of March 11, 2021 and the other with a pay date of March 25, 2021. On both documents, the "rate" shows "18Hr" and the salary/hours reflects "25hrs" with gross pay totaling \$900.00.⁹ There is nothing listed under Important Notes.

⁸ The business address listed for Medical Specialists of the Palm Beaches on the Earnings Statement submitted with application 28542 differed from the address on the Earnings Statements submitted with application 70437.

⁹ An employee working 25 hours per week at \$18 per hour would gross \$900.00 for the pay period of two weeks. The total number of hours for the pay period, however, would total 50, not 25.

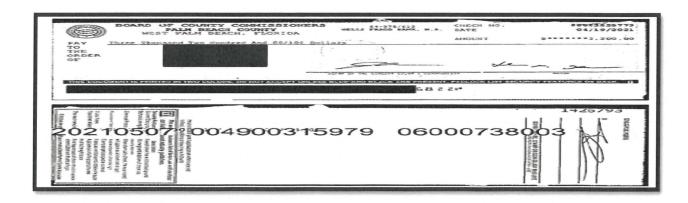


Applicant also submitted a lease similar to the lease submitted with application 28542. The beginning date for this lease is February 1, 2019, and it ends January 21, 2020. Each page of the lease shows the initials of "RP" and a co-tenant. The lease is also signed by Applicant and her co-tenant.



Payment to

On April 19, 2021, the County issued check number 00003235779 in the amount of \$3,200.00 to 10 for rental assistance for Applicant.



¹⁰ Although Applicant's application lists her landlord as SaiNaam Realty and Investment, Inc., the County issued payment to in his individual capacity, because was listed on the Landlord Balance Statement for this application.

Rental and Utility Assistance Application 93525

County records show Applicant electronically signed and submitted rental and utility assistance application 93525 to the County on September 29, 2021. Applicant listed her address as Wellington, FL and her landlord as SaiNaam Realty & Investment, Inc. She listed her monthly rent payment as \$1,550.00, and requested assistance of \$3,200.00 for September and October, 2021, including \$100.00 in late fees. The landlord Balance Statement dated October 7, 2021 submitted with this application showed \$1,100.00 due for September 2021 and \$1,550.00 due for October 2021, with no late fees assessed, and \$1,550.00 due for future dates November and December 2021.

	Month	Rent Due	Late Fee	Legal Fee	Total Due
Month 1	September 2021	\$1,100.00	\$0.00	\$0.00	\$1,100.00
Month 2	October 2021	\$1,550.00	\$0.00	\$0.00	\$1,550.00
Month 3	November 2021	\$1,550.00	\$0.00	\$0.00	\$1,550.00
Month 4	December 2021	\$1,550.00	\$0.00	\$0.00	\$1,550.00
				Grand Total:	\$5,750.00
	hat the months requested this request and/or any facount.				
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listed on tenant's I certify to property I certify to li understotenant for taken to not.	this request and/or any faccount. hat I will return any Futur prior to any Future Rent hat the mailing address is and that by signing and suit the property listed above evict the tenant for the pe	e Rent paid on my Ten collected as stated in to correct bmitting this balance stated that in doing so, to riod covered by this ren	ant's behalf to Palr his Balance Statem atement I am agree enant may remain o tal assistance, whet	nt will be applied town Beach County if the lent. In ground to accept funds or the property and n	ey vacate my n behalf of the o steps will be ck is cashed or

Applicant also requested electric utility assistance in the amount of \$278.00. Although Applicant requested \$278.00 in utility assistance in her application, the utility bill she submitted with her application showed a total due of \$338.22.

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

I've been out of work for the last month first my 7 year old sons (sic) school made him quarantine for 10 days because a child in his class had covid so he was unable to go to school so i (sic) had to stay home but then I ended up becoming sick and had to request another 2 weeks to get better. [Emphasis added]

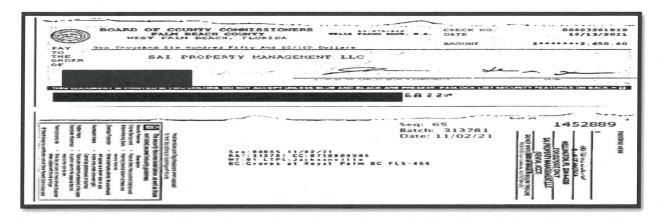
Declaration of Crisis (Please Explain the reason for your Crisis Situation below):

I've been out of work for the last month first my 7 year old sons school made him quarantine for 10 days because a child in his class had covid so he was unable to go to school so i had to stay home but then I ended up becoming sick and had to request another 2 weeks to get better.

The County processed the application on October 12, 2021.

Payment to Sai Property Management LLC

On October 13, 2021, the County issued check number 00003261829 in the amount of \$2,650.00 to Sai Property Management LLC¹¹ for rental assistance for September and October 2021.



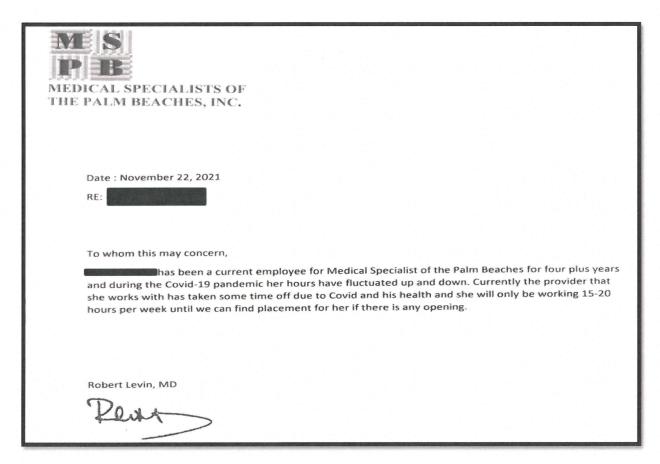
In addition, County records show a payment to Florida Power and Light (FPL) on October 13, 2021 on behalf of Applicant in the amount of \$338.22.12

Rental Assistance Application 105504

County records show Applicant electronically signed and submitted rental assistance application 105504 to the County on November 22, 2021. Applicant listed her address as Wellington, FL and her landlord as SaiNaam Realty & Investment, Inc. She listed her monthly rent payment as \$1,600.00 and requested assistance of \$4,800.00 for December 2021 through February 2022.

¹¹ Although Applicant's application listed SaiNaam Realty as her landlord, the County issued a check to Sai Property Management, LLC, a different entity, because Sai Property Management, LLC, appears on this application's Landlord Balance Statement.

¹² The \$338.22 payment on behalf of Applicant was included in County check number 00003261699 to FPL in the amount of \$4,191.45. That County check covered multiple assistance payments unrelated to Applicant's assistance.



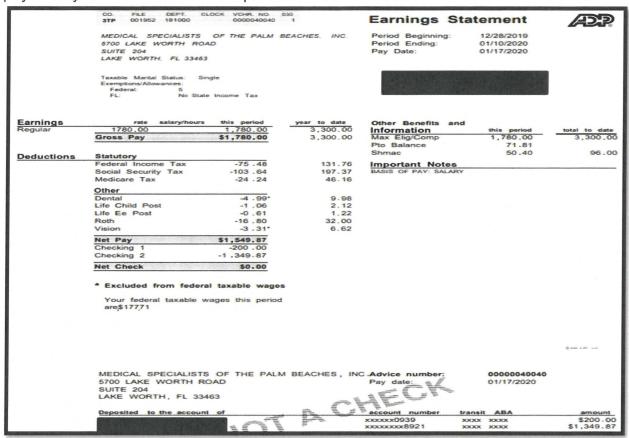
The County returned the application to her on November 22, 2021 and requested additional information, including paystubs and tax documents. Applicant resubmitted her application the same day. The County again returned the application on November 23, 2021 and requested the same information, as well as proof of crisis. Applicant resubmitted her application that same day. The County returned the application to Applicant on November 24, 2021 and again requested additional financial documentation. Applicant resubmitted her application on November 26, 2021. The County returned the application on November 30, 2021 and requested that Applicant upload additional lease documentation. Applicant resubmitted her application on December 7, 2021.

Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis Section of the application, she wrote, "My current doctor has come down with covid so the office has shorter hours because he is now working only 2 days a week for the next 1-2months (sic) from home until he is fully recovered." [Emphasis added]

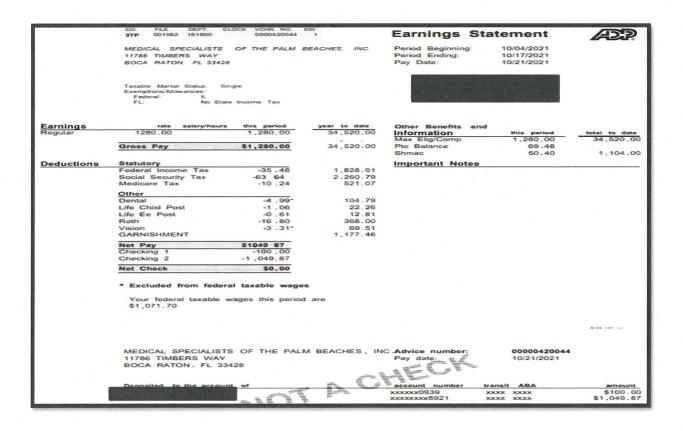
The supporting documents from Applicant submitted with this application included an employment letter purporting to be from Medical Specialists of the Palm Beaches, Inc., which is different than the letters she submitted with her previous applications. The letter is dated November 22, 2021, and is purportedly signed by Dr. Robert Levin, and stated that Applicant was only working 15- 20 hours per week due to COVID-19. The employment letter did not include a contact phone number for Dr. Levin.

Applicant also submitted six Earnings Statements with pay dates between January 17, 2020 and November 18, 2021 that identified her employer at Medical Specialists of the Palm Beaches, Inc. The Earnings Statements pay dates were January 17, 2020; January 31, 2020; October 7, 2021; October 21, 2021; November 4, 2021; and November 18, 2021. The Earnings Statements had different regular rates of pay ranging from \$1,280.00 to \$1,780.00, but did not indicate the number of hours worked or the rate of pay for the pay period.

The January 17, 2020 Earnings Statement shows a regular rate of \$1,780.00; "basis of pay: salary" is listed under the "Important Notes" section.



The October 21, 2021 Earnings Statement shows a regular rate of \$1,280.00 and there is nothing listed under the "Important Notes" section.



On December 8, 2021, the County notified Applicant via email that her application had been denied because the employer letter she submitted could not be verified.

Rental Assistance Application 108945

County records show that Applicant electronically signed and submitted rental assistance application 108945 to the County on December 9, 2021. Applicant listed her address as Wellington, FL and her landlord as SaiNaam Realty and Investment, Inc. She listed her monthly rent payment as \$1,550.00, and requested assistance of \$3,100.00 for December, 2021 and January, 2022.

The County returned the application to Applicant on December 15, 2021 and requested that she clarify the dates of COVID crisis. Applicant resubmitted her application on December 16, 2021. The County again returned the application on December 21, 2021 and requested additional documentation, including her December, 2021 paystubs, and full bank statements for the last 60 days. Applicant resubmitted her application that same day. The County again returned the application on December 22, 2021 requesting the same information. Applicant resubmitted her application on January 4, 2022. The County returned the application again on January 5, 2022 and requested additional information,

including proof of COVID crisis; income for all adult household members; and paystubs. Applicant resubmitted her application the same day. The County again returned the application on January 6, 2022 and requested proof that Applicant lost income during the time she stated she had COVID-19, or medical bills she owed as a result of COVID-19. Applicant resubmitted her application on January 7, 2022.

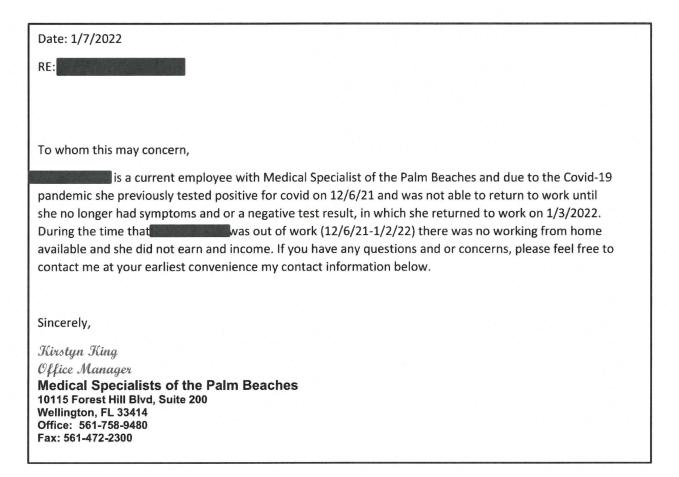
Applicant attested that her crisis was COVID-19 related. In the Declaration of Crisis section of the application, she wrote,

Hours were cut due to provider at my office being exposed to covid and I went to get tested after not feeling well on (sic) and found out I had covid on 12/8/21 so I will be out of work for at least 14days (sic) and my 3 children must be in quarantine for the next 7 days., 3day (sic) rental notice was given for eviction and I as of (sic) 1/3/22 was my first day back to work since dealing with covid from 12/8/21. [Emphasis added]

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

Hours were cut due to provider at my office being exposed to covid and I went to get tested after not feeling well on and found out I had covid on 12/8/21 so I will be out of work for at least 14days and my 3 children must be in quarantine for the next 7 days., 3day rental notice was given for eviction and I as of 1/3/22 was my first day back to work since dealing with covid from 12/8/21.

The supporting documents Applicant submitted with this application included an employment letter purporting to be from Medical Specialists of the Palm Beaches, Inc., which differed from the letters she submitted with her previous applications. The letter is dated January 7, 2022, and is purportedly signed by Kirstyn King, Office Manager. The letter stated that because Applicant tested positive for COVID-19 on December 6, 2021, she was not able to return to work until January 3, 2022.



Applicant also submitted six Earnings Statements with this application, with pay dates between January 2, 2020 and December 02, 2021, with regular earnings ranging from \$1,180.00 to \$1,520.00 for a two week period. The statement pay dates were January 2, 2020; February 13, 2020; February 27, 2020; October 7, 2021; October 21, 2021; and December 2, 2021. The statements dated February 13, 2020; October 7, 2021; and October 21, 2021 were statements Applicant previously submitted with prior assistance applications.

On March 13, 2022, the County "tagged" Applicant, listing the reason as "Match record found in State File." On June 1, 2023, the County notified Applicant via email that her application had been denied because her application was over a year old and her landlord failed to complete a Balance Statement.

OIG Interview of Medical Specialists of the Palm Beaches Director of Operations

The Director of Operations for the Medical Specialists of the Palm Beaches (Director)¹⁴ told the OIG that Medical Specialists of the Palm Beaches hired Applicant on April 22,

¹³ Community Services discovered that Applicant received a total of \$6,200.00 in rental assistance (December 2021-March 2022) and \$504.43 in utility assistance (December 2021 and January 2022) from the State of Florida. The Community Services OSCARSS system is automatically linked to the State of Florida rental assistance system.

¹⁴ This individual requested that the OIG not mention her name in this report.

2019 as an office manager, and that the company terminated Applicant's employment on June 8, 2022. The Director served as Applicant's direct supervisor.

The Director was shown the four letters dated August 12, 2020; March 29, 2021; November 22, 2021; and January 7, 2022 purportedly from Medical Specialists of the Palm Beaches. She stated that the letters were not produced by Medical Specialists of the Palm Beaches. She noted several discrepancies in the letters. In the letter dated August 12, 2020, the name of the medical practice was spelled incorrectly. The letter is purportedly signed by Kelly King, Office Manager. The Director stated that the company employed Ms. King as a front desk clerk, and that Ms. King was not authorized to sign letters on behalf of the company. The Director also stated that during the pandemic, no employees were terminated nor were hours cut. The Director stated that Applicant's hours were not reduced from full-time to part-time.

The Director noted that the address in the letter dated March 29, 2021, is not the location where Dr. Levin works. She further stated that the phone number listed on the letter for Dr. Levin was actually the office phone number assigned directly to Applicant. The Director said she verified with Dr. Levin that he did not author, sign, nor authorize the creation and distribution of the letter.

The Director stated that in the November 22, 2021 letter, the name of the company was spelled incorrectly, and the address on the letter is not the location where Dr. Levin works. Further, Applicant's hours were not reduced from full-time to part-time, and the Director verified with Dr. Levin that he did not sign nor author this letter.

The Director said that in the letter dated January 7, 2022, the name of the company was spelled incorrectly. Additionally, the letter is purportedly signed by Kirstyn King, Office Manager. The Director stated that Ms. King was employed with the company as a medical assistant, and was not authorized to author letters on behalf of the medical practice. The Director also stated that contrary to the letter's assertions, Applicant was not out of work for a month, and employees were allowed to work from home.

The OIG showed the Director the fourteen Earnings Statements Applicant submitted with her applications. The Director stated that seven of the 14 statements submitted were altered. The altered Earnings Statements were those with pay dates of January 17, 2020; January 31, 2020; March 11, 2021; March 25, 2021; October 7, 2021; October 21, 2021; and December 2, 2021. Some of the statements showed an "18Hr" rate. The Director stated that the company does not rate hours in this manner, and would not rate Applicant's hours because she was a salaried employee. The Director further stated that several of the altered statements show a pay date on a Friday, and the company does not pay employees on Fridays. Also, several of the statements do not have anything listed under the "Important Notes" section, but it is standard practice for the company to always list "basis of pay: salary" under this section. The Director also noted that Applicant's gross pay had been altered.

OIG Interview of Sai Property Management Accounting Manager

The Accounting Manager of Sai Property Management (Manager) told the OIG that he has access to all records that identify tenants and financial information.

The Manager was shown a copy of the two leases and lease addendums submitted with Applicant's applications, and said that the lease and lease addendums had been altered. He noted several discrepancies in the leases and addendums.

The Manager provided the OIG with a copy of the tenant's original lease executed on January 15, 2019. The property was leased to the co-tenant only, and Applicant was not listed on the lease. The lease also had only the co-tenant's initials on the bottom of each page acknowledging receipt.

The Manager also provided the OIG with a copy of the tenant's lease addendum dated October 19, 2020. The tenant is listed as Applicant's co-tenant, and there is only a signature listed for that co-tenant.

The Manager told the OIG that the company does not have a lease addendum dated October 31, 2019.

OIG Interview of Applicant

Applicant told the OIG that she was previously employed with Medical Specialists of the Palm Beaches for almost four years, until she was terminated on June 8, 2022. Applicant stated that she completed four rental assistance applications. She said that she entered the information into the portal for all of her applications on her own.

Applicant stated that she lost income while working with Medical Specialists of the Palm Beaches due to not being able to work during COVID. She said she got COVID three times during the first and second year of the pandemic. Applicant said every time she got COVID, she lost wages. She stated that she was never offered the opportunity to work from home.

Applicant admitted that the employer letter dated August 12, 2020 and purportedly signed by Kelly King is not accurate. She stated that Ms. King was not an office manager. Applicant also stated that the letters dated March 29, 2021 and November 20, 2021 were not written by Dr. Levin.

Applicant further stated she herself wrote the letter dated January 7, 2022 and purportedly signed by Kirstyn King. Applicant stated that the letters were partially legitimate because she did have COVID, and she was not able to work.

When Applicant was shown the Earnings Statements she submitted with her application, she stated, "They all say different amounts, so they could not be accurate paystubs."

When the OIG asked Applicant if she wished she had not falsified information on her rental assistance applications and if what she did was wrong, Applicant replied, "absolutely".

OIG Efforts to Contact Applicant's Co-tenant

The OIG attempted to contact Applicant's co-tenant via telephone and email. There was no response from the co-tenant.

Conclusion

Applicant submitted seven applications to the County for COVID related assistance. On each occasion, she attested that the information she provided was accurate. Based upon our review of documents and the statements by Applicant, the property manager at the time of the applications, and her former employer, we found that her declaration in each of her applications that she lost wages due to COVID-19 and the supporting lease documents and employment letters associated with all applications were fabricated. Additionally, Applicant submitted altered Earnings Statements with applications 70437, 105504, and 108945.

As a result of the false information Applicant provided in her first five applications (applications 28542, 48991, 65865, 70437, and 93525), the County issued \$10,400.00 in rental assistance to Applicant's landlord, \$338.22 in utility assistance to FPL, and \$1,300.00 in food assistance to Applicant. We find the total amount of assistance issued, **\$12,038.22** to be Identified Costs. We also find that Applicant attempted to collect County funds based on her submission of false documents with applications 105504 and 108945, both of which were denied.

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

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Application No	Application Submission Date	Date of County Payment	Type of Assistance	Amount Paid	Approved
28542	8/17/2020	10/26/2020	Rental	\$1,500.00	Yes
48991	11/12/2020	11/16/2020	Food	\$1,300.00	Yes
65865	1/25/2021	2/11/2021	Rental	\$3,050.00	Yes
70437	3/12/2021	4/19/2021	Rental	\$3,200.00	Yes
93525	9/29/2021	10/13/2021	Rental & Utilities	\$2,988.22	Yes
105504	11/22/2021	N/A	Rental	N/A	No
108945	12/9/2021	N/A	Rental	N/A	No
Total:				\$12,038.22	

Identified Costs: \$12,038.22

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 that the County seek reimbursement of \$12,038.22 of inappropriately issued funds.

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 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 2023-0005. The Community Services Department will seek reimbursement for \$12,038.22 issued to the subject named in this investigation.

RESPONSE FROM APPLICANT

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

I am writing in response to the draft final investigation report. Although there are a few things that I don't agree with the within the report the overall point is that just as I said when we all first spoke at the time when I received the payments for my rent, I was a struggling single mom of three with no help or resources and was finally given the opportunity to get help so what I thought. At the time I didn't think about what was being done and was so far in debt I took it not thinking about anything else besides making sure that my kids had a roof over their head. I won't make excuses for my past actions because I can't all I can do is try to correct my past actions. I've worked hard to stay on the right path not only for myself but for my children and I didn't realize I was at the time I was doing more harm by receiving something that wasn't truly for me, although I did indeed use the payments for rent again, I understand that this still didn't make it right. I also stated before that I

agreed to repay the funds that were given to me if allowed. I did reach out to the point of contact for repayment but never received a response back at that time.

Warm regards,

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