



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



Inspector General
Accredited

“Enhancing Public Trust in Government”

Investigative Report

2021-0004

Marie Belony - CARES Act Grant False Statement and Inappropriate Expenditures

August 10, 2022



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

INVESTIGATIVE REPORT 2021-0004

DATE ISSUED: AUGUST 10, 2022



Inspector General
Accredited

"Enhancing Public Trust in Government"

MARIE BELONY- CARES ACT GRANT FALSE STATEMENT AND INAPPROPRIATE EXPENDITURES

SUMMARY

WHAT WE DID

The Palm Beach County Office of Inspector General (OIG) Audit Division conducted an analysis of recipients of the Palm Beach County (County) Restart Business Grants (Restart Grants) funded by the federal Coronavirus Aid, Relief and Economic Security Act (CARES Act). In part, the analysis attempted to identify potential duplicate applications based on business name, business address, check mailing address, primary contact phone, primary contact email, and tax ID.

Of the Restart Grant requests submitted between May 22, 2020 and June 12, 2020, the OIG identified applications from 32 applicants for further review. One of these applicants, Ms. Marie Belony, submitted applications on behalf of Belony Home Investors, LLC (Belony Home Investors); Integrity Tax Services, LLC (Integrity Tax); and Marie Love Belony d/b/a Integrity Cleaning Services (Integrity Cleaning). The OIG's initial review revealed that between the date Ms. Belony initially applied for Integrity Cleaning's Restart Grant and her resubmission of the application with requested corrections, Integrity Cleaning received a U.S. Small Business Administration (SBA) Paycheck Protection Program (PPP) forgivable loan.

Based on our review of financial records and Restart Grant applications for Ms. Belony's three businesses, we found that funds were used to pay expenses that were unauthorized under the Restart Grant Program guidelines. Consequently, the OIG initiated an investigation of the following allegations:

Allegation (1): Integrity Tax Services used Restart Grant funds contrary to program guidelines.

Allegation (2): Belony Home Investors used Restart Grant funds contrary to program guidelines.

Allegation (3): Ms. Belony made a false statement in Integrity Cleaning's Restart Grant application, which resulted in improper grant funding from a County program funded by the CARES Act.

Our office reviewed Belony Home Investors, Integrity Tax, and Integrity Cleaning's Restart Grant applications; SBA PPP loan records for the three businesses; the funding agencies' program eligibility guidelines; and all three businesses' financial records. We also interviewed Ms. Belony.

WHAT WE FOUND**Allegation (1) is supported.**

Integrity Tax's Restart Grant funds were not deposited into Integrity Tax's bank account, and we found no evidence that those funds were used for eligible expenses related to Integrity Tax. Ms. Belony stated that Restart Business grant funds designated for Integrity Tax were used to pay an Integrity Tax tax penalty from 2017; however, Ms. Belony's bank records show that the monies she received from the County were not used to pay the tax penalty. Moreover, pre-pandemic tax liabilities were not eligible expenses authorized under the Restart Grant program's guidelines. This improper expenditure resulted in Identified Costs of \$10,902.00.

Allegation (2) is supported.

Belony Home Investors' Restart Grant funds were used to pay property taxes, which was not an expense authorized under the Restart Grant program's guidelines. This improper expenditure resulted in Identified Costs of \$2,231.72.

Allegation (3) is supported.

On May 27, 2020 Integrity Cleaning was approved for a \$2,602.00 PPP loan through WebBank. Integrity Cleaning received that funding on May 28, 2020. Although Ms. Belony had submitted a Restart Grant application on behalf Integrity Cleaning on May 24, 2020, the County requested additional information relating to the application. Ms. Belony resubmitted the Restart Grant application on behalf Integrity Cleaning on June 8, 2020. Ms. Belony did not report the PPP funding on Integrity Cleaning's resubmitted Restart Grant application as required, and the County awarded Integrity Cleaning a Restart Grant of \$62.50 for which it was not eligible. The inappropriate grant resulted in Identified Costs¹ of \$62.50.

Ms. Belony's response to this Report is attached.

WHAT WE RECOMMEND

We make one recommendation; that the County seek reimbursement of \$13,196.22 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 of the United States signed the CARES Act into law. The CARES Act allocated \$2.2 trillion in economic relief to individuals, businesses, and governments affected by COVID-19. State governments were allocated a total of \$139 billion based on their populations (as measured by the U.S. Census Bureau in 2019), with no state receiving less than \$1.25 billion. Florida received a total of \$8.328 billion, with \$261,174,832 of that total provided to Palm Beach County.



On May 15, 2020, the Palm Beach County Board of County Commissioners approved the Restart Business Grant Program. The County dedicated \$50 million of the approximately \$261 million allocated to it for businesses with 25 or fewer employees and dedicated \$10 million to businesses with more than 25 employees. Businesses located in the County that met certain criteria, to include the following, were eligible to apply:

- Operating since October 1, 2019 and still operating on February 29, 2020;
- Not a publicly traded company;
- Not a non-profit organization; and
- Had not received any COVID-19 relief funds in the form of a grant or forgivable loan exceeding \$25,000.

Eligible businesses included:

- Agriculture;
- Child Care Centers;
- Gyms and Fitness Studios;
- Hair Salons, Nail Salons, Barber Shops;
- Health Care Services and Medical Offices;
- Professional Services;
- Retail - Physical Brick/Mortar Stores; and
- Restaurants, Caterers, Bakeries

Eligible uses of Restart Business Grant Program funds included:

- Salaries/Payroll;
- Inventories;
- Commercial lease, mortgage, or rent payments; and
- Utilities.
- Other expenses incurred due to new safety provisions.

Restart Business Grant Applications

The County accepted online applications for the Restart Business Grant program during the following periods:

- May 22, 2020 - June 12, 2020
- September 25, 2020 - October 9, 2020
- October 26, 2020- November 6, 2020

The maximum grant was \$25,000 for the first two of the three application periods. The maximum grant was \$15,000 for the third period. Before accessing, completing, and submitting the grant application, users were required to register with the Restart Grant portal by creating a user name and password and answering a ten-question eligibility questionnaire. The application asked for information including the business' name, address, type, and number of employees. The application also asked for the name, title, and percentage of ownership for each person with an ownership interest in the business.

The application listed 11 certifications, affirmations, and acknowledgements. Applicants were required to affirm the 11 certifications, affirmations, and acknowledgements by digitally checking a box next to each one.

Included among those certifications, affirmations, and acknowledgements was the following:

I certify that the information provided in this application and the information provided in all supporting documents and forms is true and accurate. I understand that knowingly making a false statement in this application may subject me to criminal prosecution and penalties in accordance with applicable law, including, but not limited to, Chapter 817, Florida Statutes, and Chapter 47, United States Code, which may include up to five years' imprisonment and/or up to a \$250,000 fine. I further understand that, if it is determined that any of the requirements of the federal CARES Act are found to not be satisfied in connection with my application and/or grant award, Palm Beach County retains the right to seek reimbursement of any disbursed funds. [Emphasis added]

The final page of the application required the applicant's digitally typed signature.

The County Department of Housing and Economic Development (DHED) assigned submitted applications to a contracted first reviewer, who reviewed whether applicants entered all required information and included all supporting records. If an application lacked a required record, the first reviewer called the primary contact listed on the application. The first reviewer then returned the application via the portal, and a system-generated email was sent to the applicant that provided instructions on logging in and resubmitting the application with the additional information. Returning an application removed the checks in the boxes next to the certifications, affirmations, and acknowledgements, and removed the name from the signature line. The applicant had to re-check each certification, affirmation, and acknowledgement, and re-type the name on the signature line before re-submitting it with all required information.

First reviewers also calculated the grant amount for eligible applicants. The amount of revenue listed in the tax return provided with applications was the primary factor in determining the need for the requested grant amount.

A second reviewer who worked for either DHED or the County Office of Equal Business Opportunity then confirmed that the application was completed properly. Once the grant applications were reviewed by DHED twice, the applications went to the County Purchasing Department, which has access to the Internal Revenue Service database, to ensure the tax identification number (TIN)² on the grant application was legitimate and the information provided matched information in the IRS database. The TIN match was the last step before grant funds were disbursed by the Palm Beach County Clerk and Comptroller's Office. In order for the grant funds to be disbursed, the TIN on the grant application and the IRS database had to match. If the TIN matched, the Purchasing Department would notify DHED so that DHED could complete its approval process. If the application was approved, DHED emailed a request for payment to the County Finance Department of the Clerk and Comptroller's Office. The Clerk and Comptroller's Office issued checks to the business and mailed them to the address provided in the application.

Question 17 of the County Restart Business Grant Application

The Restart Grant application has an Eligibility Questionnaire section with ten questions, an Application section with 18 questions, a Certification and Affirmations section, and an Acknowledgement section. Question 17 in the Application section asked the following:

² According to the County's grant application, the TIN could be either an employer identification number (EIN) or a social security number (SSN).

Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program?:*

Yes No

For example a [Payroll Protection Program \(PPP\)](#) forgivable loan or a grant from federal, state and/or local government where your business is located

[← Go Back](#) [Save](#) [→ Save & Continue](#)

If the answer was “Yes,” an “Enter Amount” box opened and additional text appeared, stating the following:

- If “YES”, please provide documentation (such as executed Promissory Notes, Grant Agreements etc.) to verify how much relief your business received.
- If “YES”, **any amounts your business received will be deducted** from any potential award your business may receive from the Restart Grant Program. [Emphasis added]

Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program?:*

Yes No

For example a [Payroll Protection Program \(PPP\)](#) forgivable loan or a grant from federal, state and/or local government where your business is located

Enter Amount:*

\$

- If “YES”, please provide documentation (such as executed Promissory Notes, Grant Agreements etc.) to verify how much relief your business received
- If “YES”, any amounts your business received will be deducted from any potential award your business may receive from the Restart Business Grant Program

[← Go Back](#) [Save](#) [→ Save & Continue](#)

SBA PPP Forgivable Loans

The SBA PPP is an approximately \$953 billion business loan program established by the United States federal government in 2020 through the CARES Act to help certain businesses, self-employed workers, sole proprietors, certain nonprofit organizations, and tribal businesses continue to keep and rehire employees. As a result, if the recipient of the PPP loan timely applies for

forgiveness and spends the PPP loan proceeds on payroll, rent, mortgage interest, or utilities, the United States government will forgive the loan.



Ms. Belony's Businesses

- Ms. Belony registered the fictitious name Integrity Cleaning Services with the Florida Secretary of State Division of Corporations on September 27, 2017.
- Integrity Tax Services, LLC is a Florida limited liability company that was established on September 27, 2017. Marie Belony is listed as its manager and registered agent. It was administratively dissolved on September 25, 2020, and reinstated on October 20, 2021.
- Belony Home Investors, LLC is a Florida limited liability company that was established on October 7, 2017. Marie Belony and Alner Auguste are listed as its managers, and Ms. Belony is the listed registered agent. It was administratively dissolved on September 25, 2020, and reinstated on October 20, 2021. The annual reports are signed by Ms. Belony as the owner, and the reinstatement is signed by Ms. Belony as the Chief Executive Officer.

Ms. Belony submitted Restart Grant applications for each of these businesses. Based on those applications, Integrity Cleaning received \$62.50; Integrity Tax received \$10,902.00; and Belony Home Investors received \$25,000.00 from the County.

Ms. Belony also applied for and received PPP loans for each of these businesses. Integrity Cleaning received \$2,602.00; Integrity Tax received \$20,833.00; and Belony Home Investors received \$20,832.00.

Summary of Ms. Belony's Business Grants and PPP Forgivable Loans

The following OIG chart details the Restart Business Grants and PPP forgivable loans for Ms. Belony and her businesses:

Entity	Date of Restart Grant Final Application Submission	Date of Receipt of PPP Funding	Amount of Funding
Integrity Cleaning		5/28/2020	\$2,602
Integrity Cleaning	6/8/2020 ³		\$62.50
Integrity Tax	6/1/2020 ⁴		\$10,902
Integrity Tax		6/1/2020	\$20,833
Belony Home Investors	6/11/2020 ⁵		\$25,000
Belony Home Investors		6/22/2020	\$20,832

ALLEGATIONS AND FINDINGS

Allegation (1):

Integrity Tax Services used Restart Grant funds contrary to program guidelines.

Governing Directives:

Palm Beach County CARES for Business Restart Business Grant application guidelines.

Finding:

The information obtained **supports** the allegation.

According to the “PBC CARES for Business Restart Business Grant Frequently Asked Questions” (FAQs),

Grant funds can be used for business expenses including employee wages/salaries; inventories; commercial lease, mortgage or rent payments; utilities; and other expenses incurred due to new safety provisions.

The FAQs further state that the Restart Grant program was designed to help small businesses in Palm Beach County that suffered significant, temporary loss of revenue or job losses directly related to the COVID-19 pandemic.

³ Ms. Belony initially submitted the Restart application on May 24, 2020. The County requested additional information, and she resubmitted the application on June 8, 2020.

⁴ Ms. Belony initially submitted the Restart application on May 24, 2020. The County requested additional information, and she resubmitted the application on June 1, 2020.

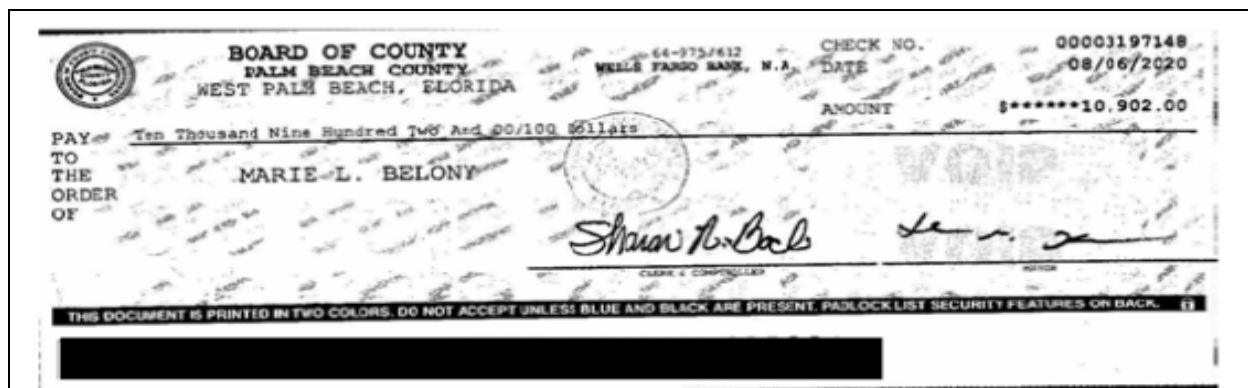
⁵ Ms. Belony initially submitted the Restart application on May 27, 2020. The County requested additional information, and she resubmitted the application on June 11, 2020.

Among the 11 certifications, affirmations, and acknowledgements in the Restart Grant application, the applicant affirms that due to the public health emergency with respect to COVID-19, the grant is necessary to support the ongoing operations for the applicant business. Ms. Belony submitted a Restart Grant application doing business as Integrity Tax Services on May 24, 2020 and resubmitted it on June 1, 2020, checking the affirmations both times.

✓ I affirm that due to the public health emergency with respect to COVID-19, this grant is necessary to support the ongoing operations for the applicant business. If funded, I affirm the applicant business will continue business operations in Palm Beach County.

Restart Grant Payment to Integrity Tax

On August 6, 2020, the County issued check #00003197148 for \$10,902 to Marie L. Belony for Integrity Tax Services.



On August 17, 2020, Ms. Belony deposited this check into the **Belony Home Investors'** business account, not the Integrity Tax business checking account.

Transaction history (continued)

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
8/10	1147	Check		10,528.78	9,953.94
8/11		Mobile Deposit : Ref Number :011110650676	3,900.00		
8/11		Purchase authorized on 08/09 Amzn Mktp US*Mf4Ze Amzn.Com/Bill WA S460222254381715 Card 3303		19.98	
8/11		Purchase authorized on 08/09 Amzn Mktp US*Mf13L Amzn.Com/Bill WA S380222328254577 Card 3303		750.89	
8/11		Purchase authorized on 08/09 Amzn Mktp US*MM408 Amzn.Com/Bill WA S460223238273497 Card 3303		14.40	
8/11		Purchase authorized on 08/10 Cash App*Corbin 8774174551 CA S380223517286425 Card 3303		250.00	
8/11	<	Business to Business ACH Debit - Forte 222106 200810 ACH-0810-69Ad3 Rmb Luxury Villas		1,900.00	10,918.67
8/12		Purchase authorized on 08/08 Amzn Mktp US*Mf4K5 Amzn.Com/Bill WA S300222236868777 Card 3303		298.84	
8/12		Purchase authorized on 08/09 Amzn Mktp US*Mf5Bv Amzn.Com/Bill WA S460222256557526 Card 3303		243.94	10,375.89
8/13		Purchase authorized on 08/12 Cash App*Fanise AL 8774174551 CA S480225895853885 Card 3303		800.00	9,575.89
8/14	1225	Check		100.00	9,475.89
8/17		Deposit Made in A Branch/Store	10,902.00		
8/17		Purchase authorized on 08/08 Amzn Mktp US*Mf5Rh Amzn.Com/Bill WA S460222250952614 Card 3303		19.84	

In response to the OIG's request for records of expenditures of the Restart Grant funds received by Integrity Tax, Ms. Belony provided Internal Revenue Services (IRS) Direct Pay confirmation pages showing payments of \$16,395.08 on September 4, 2020 for a 2017 civil tax penalty, and \$1,740.98 on September 4, 2020 for a 2018 Tax Return or Notice payment. Those payments were made from the Integrity Tax business checking account, which had a balance of over \$100,000 at the time of those payments and through the end of 2020.

It was a pleasure speaking with you today. Please find attached proof of the following expenses covered with the grant. Please let me know if any further documents is needed.

1. IRS Tax Debt paid in the amount of \$16,395.08 on 9/4/20
2. IRS 2018 Tax Balance for year 2018 paid in the amount of \$1,740.98

Marie L. Belony

Financial Service Director
Integrity Tax Services

Phone: 561-201-8515
Fax: 1 (888)-444-5168
E-mail: integritytaxs@aol.com

IRS
Signed in as: Marie Belony

Direct Pay Confirmation

Your payment has been submitted. An email confirming this transaction will be sent to the email address you provided. You may want to print or record the information on this screen for future reference.

Confirmation Number 222-0652-7497-8484

Submitted 09-04-2020 01:30 P.M. Central Time (UTC -6:00)

Payment Amount \$16,395.08

Payment Status Scheduled

Payment Date September 04, 2020

Reason for Payment Civil Penalty *Civil*

Payment Type Other Amount Due *(PAID)*

Tax Year for Payment 2017

Tax Month for Payment September

Bank Name WELLS FARGO BANK

Account Number xxxxxx0600

IRS
Signed in as: Marie Belony

Direct Pay Confirmation

Your payment has been submitted. An email confirming this transaction will be sent to the email address you provided. You may want to print or record the information on this screen for future reference.

Confirmation Number 222-0652-1417-6426

Submitted 09-04-2020 12:44 P.M. Central Time (UTC -6:00)

Payment Amount \$1,740.98

Payment Status Scheduled

Payment Date September 04, 2020

Reason for Payment Tax Return or Notice *Balance of 2018 file*

Payment Type 1040, 1040A, 1040EZ

Tax Year for Payment 2018

Bank Name WELLS FARGO BANK

Account Number xxxxxx0600

Email Address INTEGRITYTAXS@AOL.COM

From the date of receipt and deposit of Integrity Tax's Restart funds into the Belony Home Investors account through March 31, 2021 there were no money transfers from Belony Home Investors to Integrity Tax Services.

OIG Interview of Marie Belony

The OIG showed Ms. Belony the records she submitted to the OIG, which detailed her claim that Integrity Tax's use of Restart Grant funds totaled \$18,136.06. Ms. Belony clarified that \$10,902 of that Restart Grant money she received for Integrity Tax was used to pay off part of the 2017 \$16,395.08 IRS tax penalty⁶.

Ms. Belony stated that she believed that the Restart Grant program was intended to help small businesses in the community so they would not go out of business. Based on her research from the County website, Ms. Belony's understanding was that Restart Grant funds could be used for supplies, continued maintenance expenses, property taxes, tax bills, and mortgage payments. In general, she believed it could be used for any expenses that a business had prior to the pandemic in order to maintain the business. As such, it was Ms. Belony's understanding that the IRS tax debt of \$16,395.08 on Integrity Tax Services was an appropriate expense because it was a tax bill.

OIG Conclusion


Ms. Belony applied to the County and was approved for a Restart Business grant for Integrity Tax Services. Ms. Belony attested on Integrity Tax's Restart Grant application, which she resubmitted to the County on June 1, 2020, that the grant was necessary to support the ongoing operations of the applicant business due to the public health emergency with respect to COVID-19.

On August 17, 2020, Ms. Belony received \$10,902.00 in Restart Grant funds for Integrity Tax, which she deposited into the account of Belony Home Investors, instead of the Integrity Tax Services account. Over the next six months there were no funds transferred from Belony Home Investors to the Integrity Tax account or any indication that she actually used those funds for any expenses related to, for the benefit of, or to support the ongoing operations of Integrity Tax Services, as Ms. Belony affirmed it would in her application.

Although Ms. Belony told the OIG that she used the monies to pay tax penalties, the tax penalty payments were not made from the account where the Restart Grant funds were deposited. Additionally, pre-pandemic tax penalties unrelated to the public health emergency were not eligible expenses under the Restart Business grant guidelines.

According to Restart Grant program guidelines, "Grant funds can be used for business expenses including: employee wages/salaries; inventories; commercial lease, mortgage or rent payments; utilities; and other expenses incurred due to new safety provision (sic)." However, **Federal tax debts do not fall under the acceptable uses of grant funds.**

⁶ The Business Checking account for Marie L Belony DBA Integrity Tax Services had a beginning balance on September 4, 2020 of \$150,446.79. The Business Checking account for Belony Home Investors, LLC had a beginning balance on September 4, 2020 of \$121,692.38.



 PALM BEACH
 Anne M. Gannon,
 PO BOX 3353
 WEST PALM BEACH, FL 33402-3353
 (561) 355-2264

Cashier: RMunnial Location: RPTC
 Session: RMunnial-111320 Date: 11/13/2020

Payment Receipt: U21.65391
 Real Property \$2,276.85
 Bill Number: 101554093
 Bill Year: 2020
 Installment(s): 1
 PIN: 72-41-43-26-16-003-0080
 Owner: BELONY HOME INVESTORS LLC
 Prop Addr: 139 SPARROW DR 3H
 Prop Desc: ROYAL VILLAGE TOWNHOUSES COND BL
 DG 3 UNIT H
 TAG: 7248-VILLAGE OF ROYAL PALM BEACH

Tendered Information:
 Amount Due: \$2,276.85
 Check #162 \$2,276.85
 Total Tendered: \$2,276.85

By Whom Paid:
 MARIE L BELONY
 1219 CREEKSIDE DR
 WELLINGTON FL 33414-3137

Thank you

The receipts for the 2019 and 2020 property taxes and the HOA statement contain the address of 139 Sparrow Drive, 3H, Royal Palm Beach, FL. Palm Beach County Property Appraiser's (PAPA) records show that property is owned by Belony Home Investors, LLC. The mortgage statements reflect the property address as 5164 5185 Eadie Place, West Palm Beach, FL 33407. PAPA records show that both 5164 Eadie Place and 5185 Eadie Place are owned by Belony Home Investors LLC.

OIG Interview of Marie Belony

The documentation Ms. Belony provided the OIG for Belony Home Investors' use of Restart Grant funds totals approximately \$29,600. Ms. Belony clarified that she used the \$25,000 Restart Grant money for the mortgage payments⁸ and used the rest towards 2020 property taxes⁹.

Ms. Belony's stated that her understanding was that Restart Grant funds could be used for supplies, continued maintenance expenses, property taxes, tax bills, and mortgage

⁸ Ms. Belony later clarified that as a result of a bank credit, her September 2020 mortgage payment was actually \$10,528.78, and she used \$1,710.72 of the Restart Grant funds towards her Oct 21, 2020 Mortgage payment.

⁹ The OIG's review of Ms. Belony's personal and business bank records confirmed payments of these expenses.

payments. In general, she believed any expenses that a business had prior to the pandemic in order to maintain the business were appropriate for use. She said that in order for Belony Home Investors to keep its investment property, she had to pay the property taxes. As such, those property taxes were eligible uses of the Restart Grant funds.

OIG Conclusion

On July 31, 2020, Belony Home Investors received \$25,000.00 in Restart Grant funds. Ms. Belony stated that she used \$22,768.28 of those funds to pay mortgages on a business investment property, and the remaining \$2,231.72 to pay property taxes on a business investment property.

According to the Restart Grant program's guidelines, "Grant funds can be used for business expenses including: employee wages/salaries; inventories; commercial lease, mortgage or rent payments; utilities; and other expenses incurred due to new safety provision (sic)." **We find that the mortgage payments for an investment property made by a home investment business are an eligible use of Restart Grant funds, however; payment of the property tax bill is not.** This inappropriate use of funds resulted in \$2,231.72 in identified costs. The allegation is **supported**.

Allegation (3):

Ms. Belony made a false statement in Integrity Cleaning's Restart Grant application, which resulted in improper grant funding from a County program funded by the CARES Act.

Governing Directives:

Palm Beach County CARES for Business Restart Business Grant application guidelines.

Finding:

The information obtained **supports** the allegation.

The OIG reviewed Integrity Cleaning's Restart Grant applications, supporting documents, and financial records, as well as PPP loan information obtained from the U.S. Small Business Administration.

Integrity Cleaning's PPP Forgivable Loan

The OIG examined open source records that showed on May 27, 2020, the SBA approved a \$2,602 PPP forgivable loan to Integrity Cleaning.

The OIG's review of Integrity Cleaning's financial records showed that on May 28, 2020, the PPP loan proceeds were deposited into Integrity Cleaning's business checking account.



Transaction history

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
5/4		Mobile Deposit : Ref Number :414040094749	64.71		1,028.47
5/11		Zelle to Creary Corbin on 05/10 Ref #Rp054Gbcvx		230.00	798.47
5/20		Online Transfer to Belony Home Investors, LLC Ref #b08633Gm5 Business Checking City of Riviera Bch Water Deposit Transfer		64.71	733.76
5/22		Mobile Deposit : Ref Number :521210538157	900.00		1,633.76
5/28		WT Fed#01564 Zions Bancorporati /Org=Webbank Corp Srt# 2020052800005287 Trn#200528115269 Rfb# G3B00001Armkleab	2,602.00		

10

Integrity Cleaning’s Restart Grant Application

On May 24, 2020, Ms. Belony initially electronically signed and submitted a Restart Grant application for as Integrity Cleaning, and listed herself as 100 percent owner of the business. Ms. Belony responded "No" to Question 17 on the application, "Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program? For example a Payroll Protection Program (PPP) forgivable loan..."

PALM BEACH COUNTY CARES FOR BUSINESS

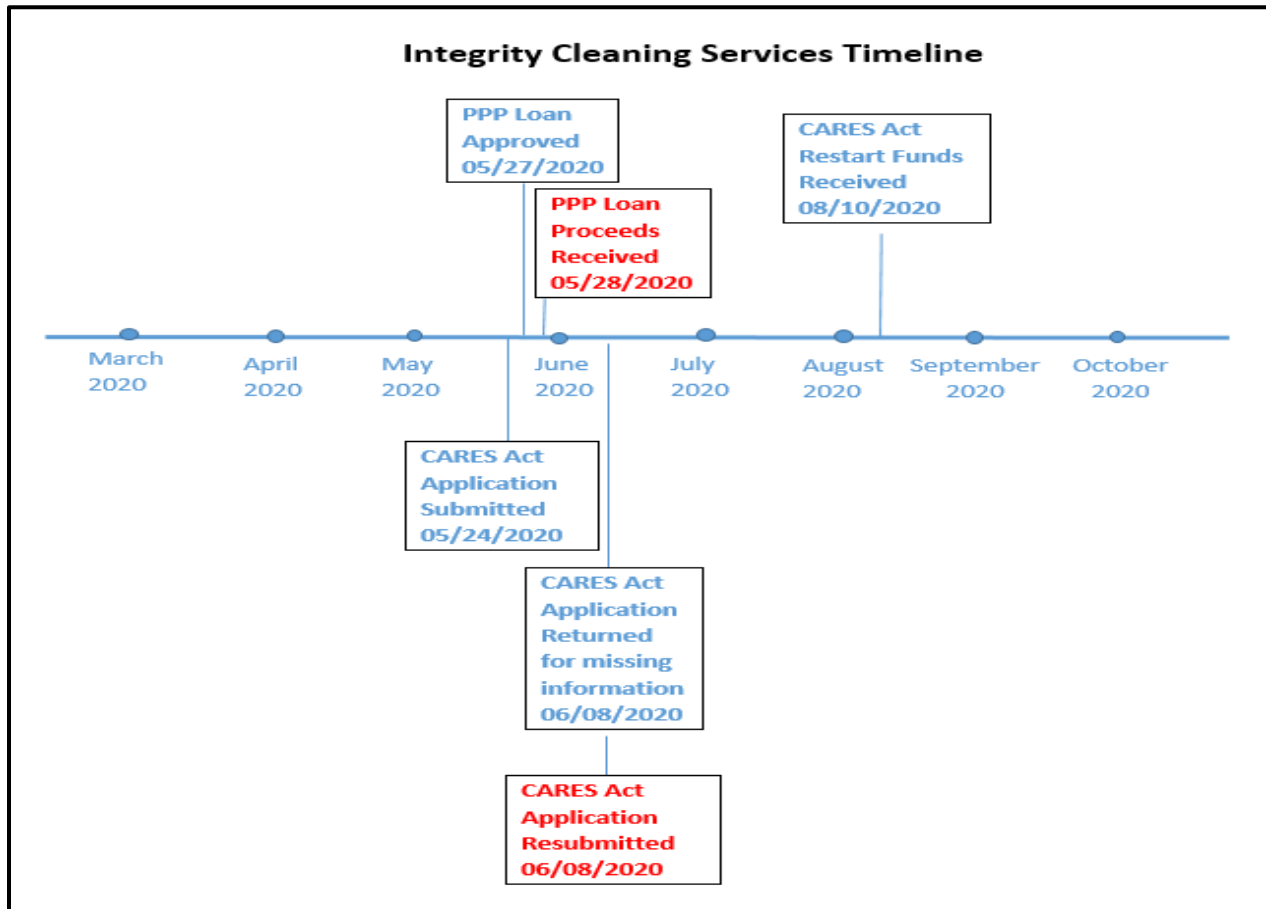
17. Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program?
 For example a [Payroll Protection Program](#) (PPP) forgivable loan or a grant from federal, state and/or local government where your business is located

No

On June 8, 2020, DHED's first reviewer returned the application to Ms. Belony, noting that she had to submit a signed income tax return, a Sunbiz certificate or Detail by Entity Name form available on Sunbiz.org, and an active Palm Beach County Tax Receipt.

On June 8, 2020, Ms. Belony resubmitted the application with her electronic acknowledgments and signature. Her answer to Question 17 remained "No." DHED

¹⁰ Handwritten notes on this and other records in this Report existed on those records when provided to the OIG by Ms. Belony.



OIG Conclusion

Integrity Cleaning was approved for a \$2,602 PPP forgivable loan on May 27, 2020. The PPP loan proceeds were deposited into Integrity Cleaning’s checking account on May 28, 2020.

Integrity Cleaning received this \$2,602 PPP loan approximately 11 days before Ms. Belony resubmitted a County Restart Grant application. Ms. Belony answered “No” to Question 17 on that application, both when she made her original Restart Grant submission on May 24, 2020, and when she made her final, corrected submission on June 8, 2020. Question 17 specifically asked if her applicant business had received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program, and specifically listed “Payroll Protection Program (PPP) forgivable loan” as an example of relief that needed to be disclosed.

While Ms. Belony’s answer was accurate at the time she initially submitted the application, Ms. Belony’s answer to that question was untrue and inaccurate at the time she resubmitted it. If she had answered that question truthfully, Integrity Cleaning’s Restart Grant would have been reduced by the \$2,602 it had already received in PPP funds, resulting in no Restart Grant award. Information provided by Ms. Belony on Integrity

Cleaning's Restart Grant application was not true and accurate as she certified, and as required per the applications. **As a result, Ms. Belony inappropriately received \$62.50.** The allegation is **supported**.

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Identified Costs: \$13,196.22

Finding	Description	Identified Costs
1	Inappropriate expenditure of grant funds- Integrity Tax Services, LLC	\$10,902.00
2	Inappropriate expenditure of grant funds- Belony Home Investors, LLC	\$2,231.72
3	False representation regarding prior PPP loan- Integrity Cleaning Services	\$62.50
Total Identified Costs		\$13,196.22

ACKNOWLEDGEMENT

The Office of Inspector General's Investigations Division would like to thank the County Department of Housing and Economic Development staff for their cooperation throughout this investigation.

RECOMMENDED CORRECTIVE ACTIONS

The OIG recommends that the County seek reimbursement of \$13,196.22 of inappropriately issued funds.

RESPONSE FROM MANAGEMENT

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

On July 19, 2022, DHED replied:

The County concurs with the IG recommendation included in OIG Investigation 2021-0004 that the County pursue action to recoup the \$13,196.22 in Restart Business funding granted to Marie Belony based on false statements and inappropriate expenditures.

RESPONSE FROM MARIE BELONY

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Marie Belony was provided the opportunity to submit a written explanation or rebuttal to the finding as stated in this Investigative Report within ten (10) calendar days. Her written response is attached to this report as Attachment A.

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

ATTACHMENT A

Date: July 30, 2022

To: Stuart Robinson, Director of Investigations
Office of Inspector General

Regarding: Cares Act Grant Investigation Report Case Number 2021-0004

Thank you for the opportunity to participate in receiving the Cares Act Grant. Like many other businesses in the county impacted by COVID-19 aftermath, this grant brought a major relief.

In regard to the allegations in the investigation report. I would like to clarify that I did not willfully and knowingly utilize grant funding inappropriately nor did I willingly and knowingly provide false statement to obtain funding.

Furthermore, In the case of Allegation (1) and (2) As stated during my interview with the investigation personnel, I was under the impression that funds were to be utilize to cover all expenses pertaining to my business. I wasn't aware that I could not use it to pay tax liabilities. As far as the check for Integrity Tax Services being deposited into Belony Home Investors account. that had to be a bank teller error. I wasn't aware of the mistake.

As far as Allegation (3) At the time I applied for the grant on May 24, 2020, I did not receive any PPP funding. Integrity Cleaning Services had come to a pause since Covid with minimal activity. I wasn't aware of the PPP deposit that was made on May 28, 2020 because I wasn't checking my account daily.

I ask that you please take my statement into consideration. Under no circumstances I would have knowingly or willingly commit any of the allegations listed in the report.

Sincerely,



Marie Belony