



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

2023-0002

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

September 23, 2024



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

INVESTIGATIVE REPORT 2023-0002

DATE ISSUED: September 23, 2024



Inspector General
Accredited

"Enhancing Public Trust in Government"

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

SUMMARY

WHAT WE DID

The Palm Beach County (County) Office of Inspector General (OIG) received a complaint from the County Community Services Department (Community Services) concerning [REDACTED] (Applicant)'s applications to the County Coronavirus Aid, Relief and Economic Security (CARES) Act Program and Emergency Rental and Utilities Assistance (ERA) Program. Community Services alleged that Applicant submitted substantively the same employment termination letter on letterhead purportedly from different companies with various assistance applications. The County approved several of Applicant's applications, but denied others once inconsistencies were discovered. Community Services also reported that Applicant received assistance from the State of Florida.

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

Allegation (1): Applicant and Prosper Joseph¹ acted together to submit false

information to the County in support of Applicant's 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 Applicant, Mr. Joseph, and individuals with knowledge of the information contained in the documents submitted with Applicant's applications.

WHAT WE FOUND

Allegation (1) is supported. We found that Applicant and Mr. Joseph acted together to submit falsified documents to the County in support of Applicant's assistance applications.

As a result of their actions, the County approved four applications seeking food, rental, and/or utility assistance on behalf of Applicant. In addition, the County approved requests for utility assistance, while denying rental assistance, on behalf of Applicant in two other assistance applications after discovering inconsistencies in her supporting documentation. The County issued a total

¹ Pursuant to applicable law, the OIG redacts personal identifying information of applicants for or participants in federal, state, or local housing assistance programs. Mr. Joseph was not the applicant or participant for the assistance program identified in this report; thus, his name was not redacted.

of \$15,004.39 in rental, utility, and food assistance on behalf of Applicant, which we find to be Identified Costs.²

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 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.

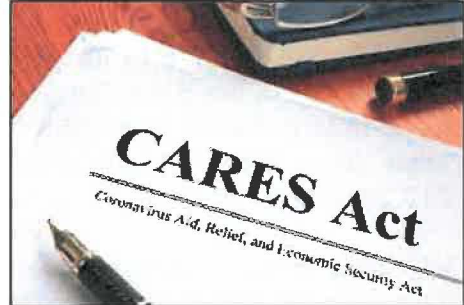
WHAT WE RECOMMEND

We make one recommendation; that the County seek reimbursement of \$15,004.39 in issued funds.

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

BACKGROUND**The CARES Act**

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



On March 27, 2020, the President 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 ERA-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 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, employment information, a rental lease agreement, and a Balance Statement from the landlord. The Balance Statement was to be completed by the applicant's landlord or property manager, and was to reflect the amount of rent owed by the applicant.



The form of the application differed slightly throughout the Program, but each included eligibility questions and acknowledgements. Applicants were required to affirm these statements by electronically 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 read³ the above information and, to the best of my knowledge and belief, the information is **accurate and has been properly recorded**. Additionally, I understand that **I am responsible for the accuracy of the information provided and that said information will be used as a basis for determining my eligibility for services**. I also understand that **any falsification or misrepresentation of this information is just cause for denial of services and prosecution for fraud**. [Emphasis added]

³ In the version of this acknowledgment for application No. 64167, there was a comma after the word "read." Otherwise, this acknowledgment was identical for applications Nos. 64167, 75033, 90113, 113627, 141688, and 81995.

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 a 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 [REDACTED], Lake Worth, FL.

Applicant's assistance applications Nos. 75033, 90113, 113627, 141688, and 81995 listed her address as [REDACTED] Lake Worth, FL 33461.⁴ This address is part of a 36-unit apartment complex located at [REDACTED], Lake Worth, FL. The Palm Beach County Property Appraiser's online database shows that [REDACTED] has been owned by [REDACTED] since January 2018.

ALLEGATIONS AND FINDINGS

Allegation (1):

Applicant and Prosper Joseph acted together to submit false information to the County in support of Applicant's 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.

⁴ Application No. 64167 requesting food assistance listed Applicant's address as [REDACTED] Lake Worth, FL 33460.

Finding:

The information obtained **supports** the allegation.

Food Assistance Application 64167

County records show Applicant's application No. 64167 seeking food assistance was electronically signed and submitted to the County on December 17, 2020. The application listed Applicant's address as [REDACTED] Lake Worth, FL 33460. The County returned the application and requested additional information on December 18, 2020. It was resubmitted that same date.⁵

The Declaration of Crisis section of application No. 64167 stated Applicant ***"Lost job due to covid 19."*** [Emphasis added]

Declaration of Crisis (Please Explain the reason for your Crisis Situation below):
Lost job due to covid 19

The supporting documents submitted with this application included Applicant's driver's license and a 2019 income tax return, along with a layoff letter dated "March, 20 2020" containing several typographical errors and purporting to be from Walmart and authored by Joe Bryant, a Walmart "HR Rep."

The layoff letter had a Walmart logo but did not include a phone number, email address, or corporate address for Walmart or HR Rep. Bryant. The letter stated that as a result of COVID-19, Applicant's "position is subject to a layoff" and her "last day of employment will be [20, March 2020]."

⁵ The County returned the application a second time, and it was resubmitted to the County on December 20, 2020.



The County processed the application on December 21, 2020 and approved the issuance of a grocery card to Applicant in the amount of \$1,300.00 on December 28, 2020.⁶

County records obtained by the OIG show that the food card was used for several unallowable⁷ expenses, including purchases at locations other than grocery stores and payments of \$342.59 to Geico Auto and \$607.00 to Carmax Auto Finance.

⁶ County records show that the card was funded on January 15, 2021, and the food card was mailed on January 17, 2021 to Applicant at the address listed in application No. 64167.

⁷ Community Services maintains information on its website regarding the rules for the food assistance program. Although the website was revised during the duration of the program, Community Services advised our office that the guidelines for allowable expenses remained consistent. The Palm Beach County's CARES ACT- Coronavirus Relief Fund – Rent and Utilities Assistance Program Frequently Asked Questions posted to the website provides, the "food assistance card may ONLY be used to **purchase food at grocery stores**. You may use the grocery store of your choice but the card is only valid on food items." [Emphasis added]

Beginning Balance	Total Credits	Total Debits	Ending Balance
\$0.00	+\$1,300.00	-\$1,299.10	\$0.90

Total: 13

Records: page v

Date	Description	Amount	Reference Number
1/15/2021 10:00:07 AM	VALUE LOAD	\$1,300.00	CC0037AC59F6
1/25/2021 12:31:44 AM	GEICO "AUTO MACON DC	-\$342.59	24092161025102581774488
1/25/2021 12:45:46 PM	PUBLI: 4895 GREENACRES FL	-\$9.67	24137461026301126203150
1/25/2021 12:56:33 PM	MCDONALD'S F25345 LAKE WORTH FL	-\$8.76	2442733102573237443301
1/25/2021 1:54:53 AM	VISBLE 866-331-3527 CO	-\$40.00	244932151025748656785203
1/25/2021 1:35:35 AM	KFC E320096 WEST PALM BEACH FL	-\$14.43	24432061025400324200879
1/26/2021 10:27:03 PM	MWS MW FOOD STORES002333RIVERA BEACH FL	-\$6.00	1025870670045
1/26/2021 11:03:19 PM	DOLLAR TREE WEST PALM BEACH FL	-\$10.70	102600038502
1/26/2021 11:50:09 PM	PUBLY SUPER MAR 4845 SOUGREENACRES FL	-\$26.23	102623401148
1/26/2021 2:27:44 AM	WM SUPERCENTER # LAKE WORTH FL	-\$191.51	102500702449
1/26/2021 5:16:01 PM	CARMAX AUTO FINANCE 770-792-4750 GA	-\$607.80	24445001026200087091413
1/27/2021 2:36:06 PM	PUBLY SUPER MAR 8989 CREEK WEST PALM BEACH FL	-\$12.89	102715721692
1/28/2021 4:12:39 PM	PUBLY SUPER MAR 8989 CREEK WEST PALM BEACH FL	-\$29.90	170316169020

Rental Assistance Application 75033

County records show Applicant's rental assistance application No. 75033 was electronically signed and submitted to the County on May 4, 2021. Application No. 75033 listed Applicant's address as [REDACTED], Lake Worth, FL, her landlord as Avaira [sic] at Lake Worth, and her monthly rent payment as \$1,795.00.⁸ The

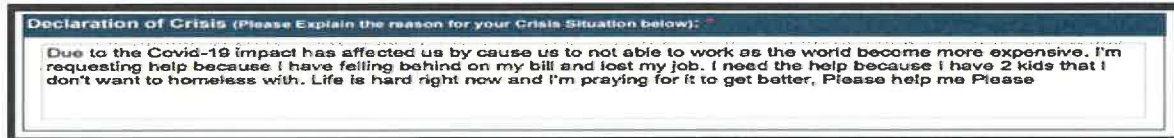
Additional Questions - Rental Assistance	
What is the Rent Due Date?	
What is your Landlord's Name?	Avaira at Lake Worth
What is your Landlord's Address?	933 S Congress Ave, Delray Beach, FL 33445
What is your Landlord's Email Address?	support@avairafloida.com
What is your Landlord's Phone Number?	561-463-8400
What is your Monthly Rent Amount?	\$1,795.00
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?	No
What is the Rental Months Requested?	08/2021, 07/2021, 06/2021, 05/2021
What is the Rental Past Due Amount Requested?	\$7,489.00
What is the Rental Late Fees Amount Requested?	\$304.00
What is the Rental Total Amount Requested?	\$7,793.00
How many Bedrooms are in your Home?	3

application sought assistance for May through August 2021 in an amount totaling

⁸ The lease, landlord balance statement, and letter purportedly from Avaira Florida Properties submitted with application No. 75033 lists the monthly rental rate as \$1,785.00.

\$7,789.00.⁹ The application's Declaration of Crisis states Applicant's needed assistance was COVID-19 related.

Due to the Covid-19 impact (sic) has affected us by cause (sic) us to not (sic) able to work as the world become (sic) more expensive. I'm requesting help because I have felling (sic) behind on my bill and lost my job. I need the help because I have 2 kids that I don't want to (sic) homeless with. Life is hard right now and I'm praying for it to get better, Please help me Please.



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

Due to the Covid-19 impact has affected us by cause us to not able to work as the world become more expensive. I'm requesting help because I have felling behind on my bill and lost my job. I need the help because I have 2 kids that I don't want to homeless with. Life is hard right now and I'm praying for it to get better, Please help me Please

The County returned the application on May 5, 2021 and requested additional information, including proof of Covid-19 crisis, a State of Florida Department of Economic Opportunity (DEO) unemployment letter showing amounts received and payment history, and food stamp letter showing Applicant's name and benefits. Thereafter, the County returned the application on ten separate occasions, requesting that Applicant provide additional information on income history, address information, employment information, more details about her Covid crisis, and lease information. On each occasion, Applicant responded by providing additional information. Additionally, during the review process, a Community Services reviewer spoke with Applicant regarding the information in her application.

The supporting documents submitted with this application included Applicant's driver's license; three Virgo Health Service earnings statements; and a layoff letter dated "May, 1 2021" containing several typographical errors and purporting to be from Virgo Health Service and signed by Kemari Bryant, an "HR Rep." The layoff letter had a Virgo Health Service logo but did not include a phone number, email address, or corporate address for Virgo Health Service or HR Rep. Bryant. The letter stated that "Adecco" was experiencing financial difficulties, and that Applicant's employment "is subject to a layoff" and her "last day of employment will be 01, March 2021]."

The layoff letter purportedly from Walmart submitted with application No. 64167 and the layoff letter purportedly from Virgo Health Services submitted with application No. 75033 were virtually identical in form and verbiage, typographical errors, format of the date (both letters had a comma after the month instead of the day), and the last name (Bryant) of the H.R. Rep who supposedly signed the letters.

⁹ We were unable to reconcile the amount requested in the application with lease amount and late fees listed in the lease and landlord Balance Statement.

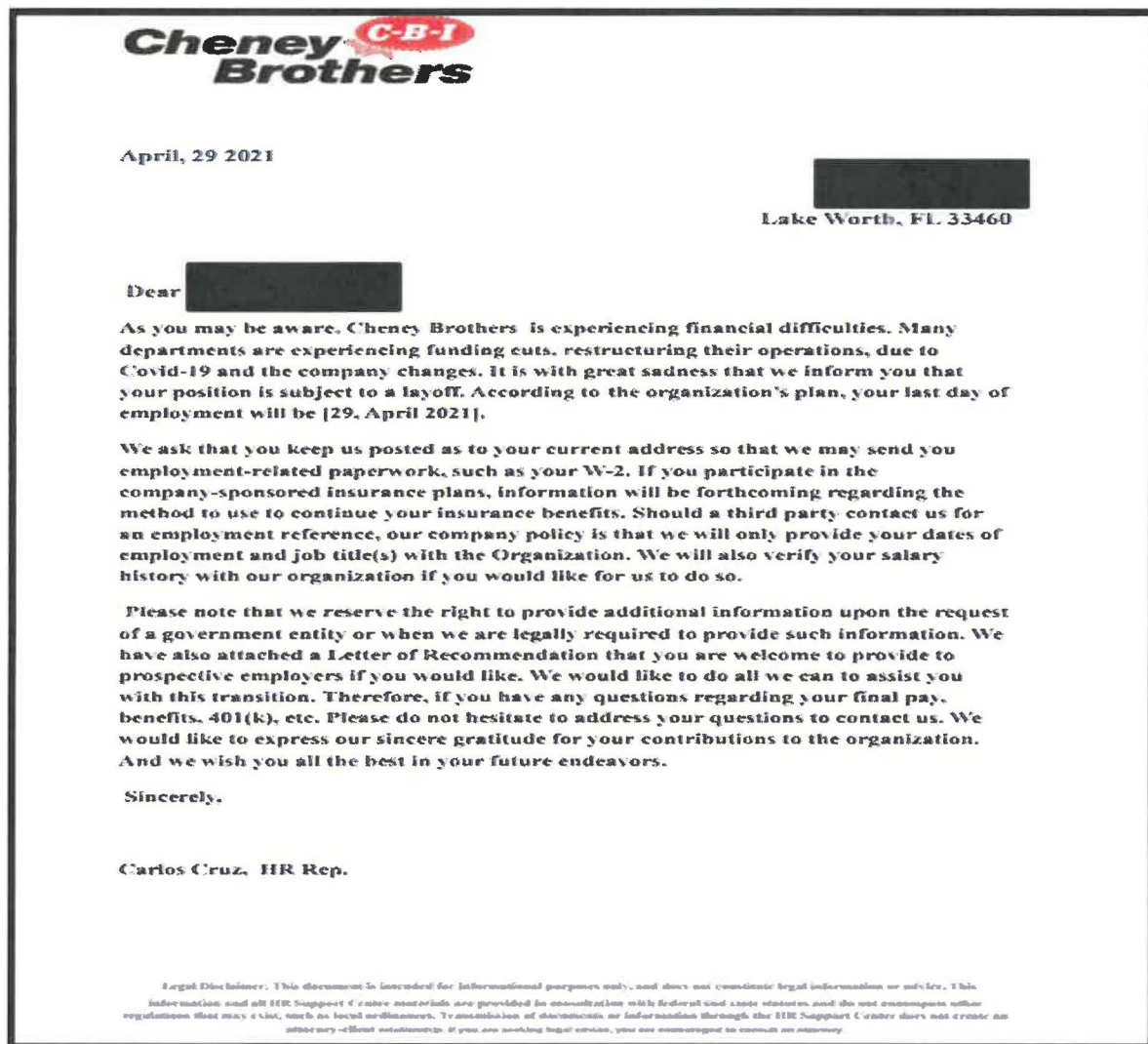


The three earnings statements submitted with application No. 75033 had pay dates of March 26, 2021, April 2, 2021, and May 10, 2021, and identified Applicant's employer as Virgo Health Services.¹⁰

¹⁰ The layoff letter and three earnings statements show Applicant's address as [redacted] Lake Worth, FL 33460. This address, which was also listed as Applicant's address in application No. 64167, is the residence of Applicant's mother. Applicant resided there with her mother prior to and after residing at [redacted] Lake Worth, FL.






Applicant also submitted supporting documents for another individual, whom she listed on her application as a household member and her alleged "Significant Other." The documents included four earnings statements and a layoff letter for that individual purporting to be from Cheney Brothers. The letter was dated "April, 29 2021" and purportedly signed by Carlos Cruz, a Cheney Brothers "HR Rep." The layoff stated [REDACTED] position "is subject to a layoff" and his "last day of employment will be [29, April 2021]."




The layoff letter purportedly from Cheney Brothers was almost identical in form and verbiage, typographical errors, and format of the date (the three letters had a comma after the month instead of the day) as Applicant's layoff letters purportedly from Walmart and Virgo Health Service submitted with application No. 64167 and application No. 75033, respectively.

The four earnings statements had pay dates between March 26, 2021 and May 7, 2021, and identified that individual's employer as Cheney Brothers, Inc.

 CHENEY BROTHERS, INC. ONE CHENEY WAY RIVIERA BEACH, FL 33404-7000 (561) 845-4700		Earnings Statement Period Beginning: 03/21/2021 Period Ending: 04/03/2021 Pay Date: 04/09/2021	
CO: FILE DEPT CLOCK YCRF, NO 130 99J 015015 835300 0000410248 1			
Filing Status: Single/Married Filing separately Exemptions/Allowances: Federal: Standard Withholding Table			
Earnings		Additional Tax Withholding Information	
Regular	rate 18.2100 hours 80.00 this period 1,456.80 year to date 12,585.64	Exemptions/Allowances:	
Overtime	27.3150 20.85 569.52 2,680.08	FL: No State Income Tax	
Retroactive			
Gross Pay \$2,026.32		434.19 15,699.91	
Deductions			
Statutory			
Federal Income Tax -177.37 1,081.42			
Social Security Tax -125.13 970.91			
Medicare Tax -29.27 227.07			
Other			
Dental Ins 125 -8.01* 40.05			
Lid -4.00 20.00			
Shortterm Dis 6.46			
Net Pay \$1,682.54			
Checking Acct -1,682.54			
Net Check \$0.00			
* Excluded from federal taxable wages Your federal taxable wages this period are \$2,018.31			
Additional Tax Withholding Information Taxable Marital Status: FL: Single			
 CHENEY BROTHERS, INC. ONE CHENEY WAY RIVIERA BEACH, FL 33404-7000 (561) 845-4700		Advice number: 00000410248 Pay date: 04/09/2021	
Deposited to the account of Gerald Paulmon		account number 300000006286 transit ABA XXXX XXXX amount \$1,682.54	
THIS IS NOT A CHECK NON-NEGOTIABLE			

The County processed application No. 75033 on June 28, 2021.

Payment to 

On June 29, 2021, the County issued check number 00003245914 in the amount of \$7,410.00 to  for rental assistance for application No. 75033, including late fees.

[illegible]**Utility Assistance Application 81995**

County records show Applicant's application 81995 seeking utility assistance was electronically signed and submitted to the County on July 14, 2021. The application listed Applicant's address as [REDACTED], Lake Worth, FL, stated that her utility bill was \$272 past due,¹¹ and requested electric assistance of \$500.00.

Additional Questions - Home Energy Assistance		
What is the Electric Bill Due Date?	07/07/2021	
What is the Electric Company's Name?	LAKE WORTH UTILITES (LAKE0023)	
What is the Electric Company Account Number?	23727176802	
Did you receive an Electric Bill Late Notice?	Yes	
What is the Electric Bill Due Start Date?	07/02/2021	
What is the Electric Bill Due End Date?	08/05/2021	
What is the Electric Bill Due Amount Requested?		\$500.00
Is your Electric Bill in a household member's name?	Yes	
Is the Electric Bill in your name?	Yes	
What is the name on the Electric Bill?		
What is their relationship to you? (Person on Electric Bill)		
What is your Electricity Past Due Amount?		\$272.00

¹¹ The utility bill submitted with Applicant's application No. 81995 showed a total due of \$271.50.

The application stated that Applicant's crisis was COVID-19 related. The Declaration of Crisis section of the application stated, "I am a mother of two kids who is going thru a hard time and need some help."

Additional Questions - Self Attestation

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

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

- ☒ Reduction or Loss of Income
- ☒ Lost Employment
- ☒ Qualified for Unemployment
- ☒ Increase in Expenses Due to COVID-19
- ☒ Caring for or being a High Risk Individual
- ☒ Responsible for Caring for Children / Grandchildren at Home
- ☒ 30% or More Rent Increase

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

I am a mother of two kids who is going thru a hard time and need some help

The County returned the application to Applicant on July 14, 2021 and requested a signature on the social security card submitted with the application. The application was resubmitted that same day.

The supporting documents submitted with this application included a City of Lake Worth Beach utility bill dated July 7, 2021 in the name of her alleged "Significant Other", reflecting a past due amount totaling \$271.50, as well as the same layoff letters and earnings statements from Virgo Health Service for Applicant and from Cheney Brothers for her alleged "Significant Other" that were submitted with application No. 75033.

City of Lake Worth Beach utility bill

City of Lake Worth Beach
July 07, 2021

Account Number
237271-76802

End Bill Amount	Payments	Adjustments	Previous Balance	New Charges	Total Amount Due	New Charges Due By
\$ 204.73	\$ -85.55	\$ 11.00	\$ 130.18	\$ 141.32	\$ 271.50	08/03/2021

Message Center
Your account is past due. Any previous balance is subject to disconnection.
NEW Options
- Pay by Phone: 833-336-0893 (24 hours per day)
- Pay by CASH at 7-Eleven, CVS - sign up via: PayNearMe.com/LakeWorthBeach
- Pay Online - www.LakeWorthBeachFL.gov
- Pay by Mail: City of Lake Worth Beach
PO BOX 30562
TAMPA FL 33630-3562
- Report a Power Outage or Street Light issue: outage.LakeWorthBeachFL.gov

Summary of New Charges
Electric:
Total New Charges: 141.32
Previous Balance Forward: 130.18
Total Amount Due: \$ 271.50

Electric Service
Electric: 86.45
Fuel Charge: 41.50
Gross Receipts Tax: 3.28
Public Utility Tax: 10.09
Electric Total: 141.32

Electric Usage History
Bar chart showing electric usage history from June 2020 to July 2021. The y-axis represents usage in kWh, ranging from 0 to 1200. The x-axis shows months from June 2020 to July 2021. Usage fluctuates between approximately 400 and 1000 kWh.

Meter # E 70011081
Service Period 05/26/2021 to 06/25/2021
Service Days 30
Current Read 18683
Previous Read 18523
KWH USED 1160

THE 2020 ANNUAL DRINKING WATER QUALITY REPORT FOR THE CITY OF LAKE WORTH BEACH IS AVAILABLE FOR DOWNLOAD AND VIEWING AT lakeworthbeachfl.gov/2020-water-quality-report. A COPY OF THE REPORT WILL ALSO BE MAILED SEPARATELY TO ALL UTILITY ACCOUNT HOLDERS.

Please see back of statement for additional charges.

City of Lake Worth Beach
414 Lake Avenue
Lake Worth, FL 33460-3807

Account Number
237271-76802
Total Amount Due
\$ 271.50

Optional Donation
\$ _____
\$ _____

Care to Share Tax Deductible
Total Amount Enclosed: \$ _____
Make check payable to City of Lake Worth Beach

000237271000076802000000027150

City of Lake Worth Beach
414 Lake Avenue
Lake Worth, FL 33460-3807

Office Hours
Monday through Friday
8:00 a.m. - 5:00 p.m.



Customer Service
561-533-7300
Now Open 24 hours per day to better serve you in English & Spanish

Email us at:
customer-service@lakeworthbeachfl.gov

The County processed application No. 81995 on July 20, 2021.

Payment to Lake Worth Utilities

County records show that on July 21, 2021, the County issued payment of \$271.50¹² to Lake Worth Utilities for Applicant's application No. 81995.

 BOARD OF COUNTY COMMISSIONERS PALM BEACH COUNTY WEST PALM BEACH, FLORIDA		64-975/612 WELLS FARGO BANK, N.A.	CHECK NO. 0000324886	DATE 07/21/2021
FAY One Thousand Seven Hundred Sixty And 97/100 Dollars		AMOUNT \$*****1,760.97		
TO THE ORDER OF LAKE WORTH UTILITIES				
THIS DOCUMENT IS PRINTED IN TWO COLORS - DO NOT ACCEPT UNLESS BLUE AND BLACK ARE PRESENT. PADLOCK L & T SECURITY FEATURES ON BACK.				
#000324886 10				

Have a pen or pencil handy when you need to fill in the information on this form. The security features listed below, as well as those not listed, are used to verify the authenticity of the document. Security Features: - Color: The document is printed in two colors (blue and black). - Paper: The document is printed on high quality paper. - Markings: The document contains markings that are not visible to the naked eye. - Chemical: The document is printed with chemical-resistant ink. - Fluorescent: The document is printed with fluorescent ink. - Visible: The document is printed with visible markings. - Invisible: The document is printed with invisible markings. - Thermal: The document is printed with thermal ink. - Magnetic: The document is printed with magnetic ink. - Other: The document is printed with other security features.	Seq: 49 Dep: 005794 Date: 07/27/21	DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RECEIVED FOR DEPOSIT ONLY
--	---	---

For Deposit Only to City of Lake Worth, FL City of Lake Worth, FL Utilities Deposited by: Rose

Rental and Utility Assistance Application 90113

County records show Applicant's rental and utility assistance application No. 90113 was electronically signed and submitted to the County on September 10, 2021. The application listed Applicant's address as [REDACTED], Lake Worth, FL and her landlord as "Avaira [sic] at Lake Worth." The application listed Applicant's monthly rent payment as \$1,785.00 and requested rental assistance for September 2021 through December 2021. Additionally, Applicant requested \$141.00¹³ in electric utility assistance.

¹² The \$271.50 payment on behalf of Applicant was included in County check number 00003248861 to Lake Worth Utilities in the amount of \$1,760.97.

¹³ Applicant requested \$141.00 in assistance on her application. The utility bill she submitted with her application showed a total due of \$140.77.

Additional Questions - Rental Assistance	
What is the Rent Due Date?	Avaira at Lake Worth
What is your Landlord's Name?	933 S Congress Ave, Delray Beach, FL 33445
What is your Landlord's Address?	support@evianflorida.com
What is your Landlord's Email Address?	561-463-8400
What is your Landlord's Phone Number?	\$1,785.00
What is your Monthly Rent Amount?	No
Are you currently receiving section 8 or any federal housing subsidies?	Yes
Did you receive a Rental Late or Eviction Notice?	No
Have you received an eviction notice (issued after 3/15/2020) caused by the COVID-19 pandemic?	12/2021, 11/2021, 10/2021, 09/2021
What is the Rental Months Requested?	\$7,140.00
What is the Rental Peak Due Amount Requested?	\$300.00
What is the Rental Late Fees Amount Requested?	\$7,440.00
What is the Rental Total Amount Requested?	3
How many Bedrooms are in your Home?	

The application attested that Applicant's crisis was COVID-19 related. In the Declaration of Crisis section of the application, Applicant stated, "I still need help with my rent I'm currently still unable to (sic) do (sic) to covid 19 that a member of my household has."

Declaration of Crisis (Please Explain the reason for your Crisis Situation below):
I still need help with my rent I'm currently still unable to do to covid19 that a member of my household has

The same layoff letters for Applicant purportedly from Walmart submitted with application No. 64167 and from Virgo Health Service submitted with application No. 75033 were submitted with this application. A City of Lake Worth Beach utility bill dated August 5, 2021 in Applicant's name was also submitted with the application. The August 5 utility bill reflected the same account number and service address as the July 7 utility bill in her alleged "Significant Other's" name that was submitted with application No. 81995.

On September 15, 2021, the County approved the utility assistance portion of the application and made a payment to Lake Worth Utilities on September 17, 2021 on behalf of Applicant in the amount of \$140.77.¹⁴


The County processed the rental assistance portion of the application on September 27, 2021, and made payment on September 29, 2021.

Payment to [REDACTED]

On September 29, 2021, the County issued check number 00003259840 in the amount of \$11,487.00¹⁵ to [REDACTED] for rental assistance for application No. 90113.

¹⁴ The \$140.77 payment on behalf of Applicant was included in County check number 00003257336 to Lake Worth Utilities in the amount of \$376.85.

¹⁵ County records show this check reflected rental assistance for Applicant in the amount of \$5,355.00, as well as for another individual in the amount of \$6,132.00.

 <p>BOARD OF COUNTY COMMISSIONERS PALM BEACH COUNTY WEST PALM BEACH, FLORIDA</p>	44-9757612 TELLER 778000 BANK, N.A.	CHECK NO. DATE	00003259840 09/29/2011
		AMOUNT	\$*****11,487.00

PAY TO THE ORDER OF Eleven Thousand Four Hundred Eighty Seven And 00/100 Dollars

[REDACTED] LLC

[Signature] *[Signature]*

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

BB 2218

1450903

<p>DO NOT WRITE IN THESE SPACES</p> <p>FOR DEPOSIT ONLY</p> <p>BANK OF AMERICA, N.A.</p>	<p>DEPOSIT SLIP</p> <p>TO THE ORDER OF ACCOUNT OF</p> <p>W/INAMED PAYEE</p> <p>FOR DEPOSIT ONLY</p> <p>DATE: 09/29/2011</p> <p>AMOUNT: \$11,487.00</p> <p>TOTAL: \$11,487.00</p>
---	---

Rental and Utility Assistance Application 113627

County records show Applicant's rental and utility assistance application No. 113627 was electronically signed and submitted to the County on April 13, 2022. The application listed Applicant's address as [REDACTED], Lake Worth, FL; her landlord as "Avaira [sic] at Lake Worth;" her monthly rent payment as \$1,875.00; and requested assistance for April 2022 through August 2022. Additionally, the application requested \$75.00¹⁶ in water utility assistance.

¹⁶ Applicant requested \$75.00 in assistance on her application. The utility bill she submitted with her application showed a total due of \$74.88.

Additional Questions - Rental Assistance	
What is your Landlord's Name?	Avaira at Lake Worth
What is your Landlord's Address?	933 S Congress Avenue Delray Beach, FL 33445
What is your Landlord's Email Address?	support@aviarafflorida.com
What is your Landlord's Phone Number?	561-463-8400
What is your Monthly Rent Amount?	\$1,875.00
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?	06/2022, 07/2022, 06/2022, 05/2022, 04/2022
What is the Rental Past Due Amount Requested?	\$9,375.00
What is the Rental Late Fees Amount Requested?	\$400.00
What is the Rental Total Amount Requested?	\$9,775.00
How many Bedrooms are in your Home?	3

The application indicated that Applicant's crisis was *not* COVID-19 related.

Additional Questions - Self Attestation	
Is your Crisis COVID-19 or NON-COVID Related? *	NON-COVID

However, the Declaration of Crisis section of the application stated, "due to job loss of covid 19, high risk issues due pregnancy."

Declaration of Crisis (Please Explain the reason for your Crisis Situation below): *	
due to job loss of covid 19, high risk issues due pregnancy	

Additionally, the application noted that Applicant had received funding from "Our Florida."¹⁷

Have you received any subsidy or assistance for Rental or Utilities from another Entity? *	Yes
Who provided this Assistance?	PBC, Our Florida

The County returned this application to Applicant on April 15, 2022 and requested additional information, including proof that she had no pending applications with Our Florida, had no income, and received food stamps or child support. The application was resubmitted that same day.

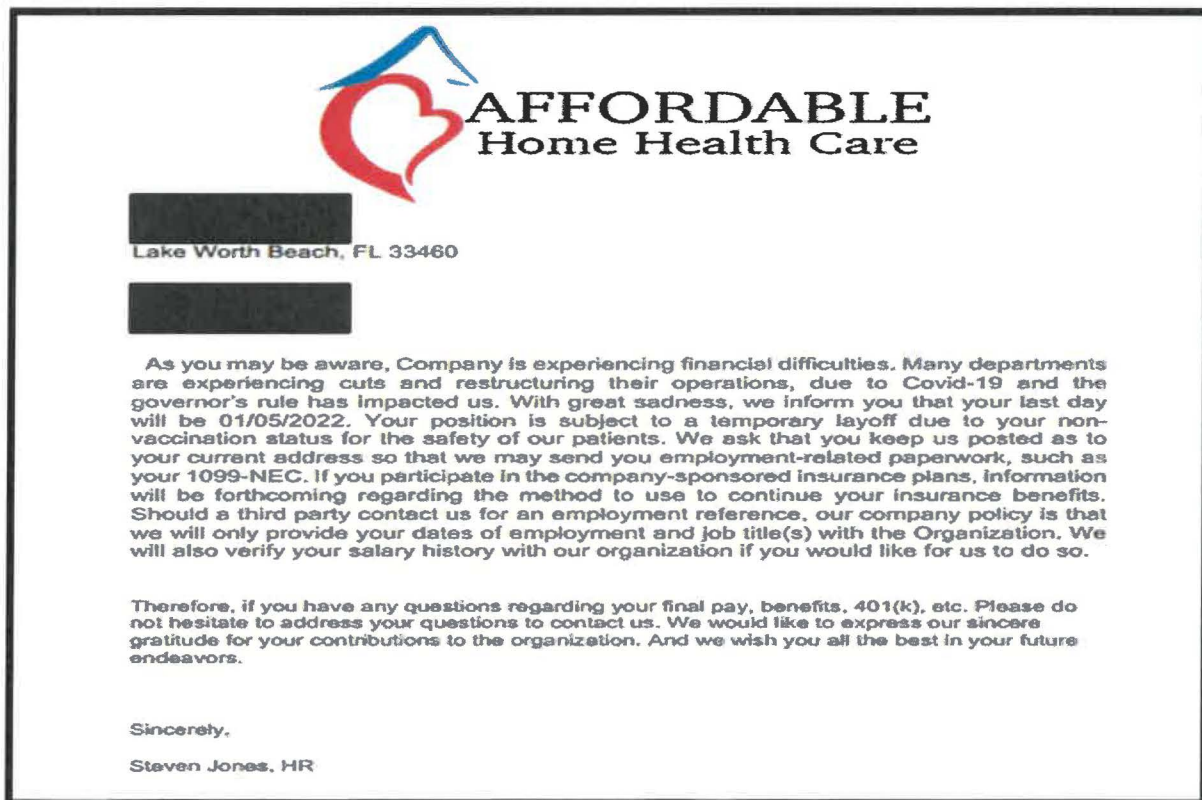
¹⁷ OUR Florida was a program that provided rental and utility assistance to eligible renters facing financial hardship due to the COVID-19 pandemic. The program was administered by the Florida Department of Children and Families (DCF) and was funded by federal dollars from the U.S. Treasury. Community Services told the OIG that it discovered Applicant received a total of \$11,250.00 in rental assistance from the State of Florida for September 2021 through February 2022. Community Services had provided Applicant with rental assistance totaling \$5,355.00 for September through December 2021 pursuant to her assistance application No. 90113. The Community Services OSCARSS system is automatically linked to the State of Florida rental assistance system.

The County again returned the application on April 18, 2022, and notified Applicant that the County would be unable to process her application until the State made a decision on her pending application with them. The application was resubmitted on April 19, 2022. The County again returned the application on April 20, 2022, citing the same rationale. The application was resubmitted on April 26, 2022 with information showing that Applicant's application with Our Florida had been denied.

On May 5, 2022, the County approved the utility portion of assistance application No. 113627, but the County again returned Applicant's rental assistance application on May 6, 2022 and requested that she provide the last two months' bank statements if she was not working, and that she certify zero income if no income existed. On May 10, 2022, the County denied Applicant's rental assistance application due to questions regarding her income documents.

On May 15, 2022, Applicant requested an appeal of the County's decision. On June 22, 2022, the County notified Applicant that her appeal had been denied.

The supporting documents Applicant submitted with her application included an undated layoff letter purporting to be from Affordable Home Health Care and signed by "Steven Jones, HR." The letter had an Affordable Home Health Care logo, but did not include an email address, phone number, or address for the company or HR Rep. Jones.



The Affordable Home Health Care letter submitted with application No. 113627 is similar to the Walmart layoff letter submitted with application No. 64167 and the Virgo Health Service and Cheney Brothers layoff letters submitted with application No. 75033. The Home Health Care letter added that "Company" was experiencing financial difficulties, and Applicant's position "is subject to a temporary layoff due to your non-vaccination status...."

Payment to Palm Beach County Water Utilities Department

County records show that on May 6, 2022, the County issued payment of \$74.76¹⁸ to Palm Beach County Water Utilities Department on behalf of Applicant.

Rental and Utility Assistance Application 141688

County records show Applicant's rental and utility assistance application 141688 was electronically signed and submitted to the County on July 15, 2022. The application listed Applicant's address as [REDACTED] Lake Worth, FL and her landlord as Avaira at Lake Worth. The application listed her monthly rent payment as \$1,800.00 and requested assistance for April 2022 through September 2022. The application also requested \$306.00¹⁹ in electric utility assistance and \$146.00²⁰ in water utility assistance.

The application attested that Applicant's crisis was not COVID-19 related, as permitted under the Emergency Rental Assistance Program ERA-2.

Additional Questions - Self Attestation	
Is your Crisis COVID-19 or NON-COVID Related? *	NON-COVID
Please enter the Start Date of your NON-COVID Related Crisis: *	02/09/2020
Crisis is due to following NON-COVID related issues: *	
<input type="checkbox"/> Absent Household Member <input type="checkbox"/> Non-Covid Related <input type="checkbox"/> Car Repairs <input type="checkbox"/> Bereavement Expenses <input type="checkbox"/> Income Reduced <input checked="" type="checkbox"/> Lost Job <input checked="" type="checkbox"/> Medical Expenses	

¹⁸ The \$74.76 payment on behalf of Applicant was included in County check number 00003287878 to Palm Beach County Water Utilities Department in the amount of \$194.12.

¹⁹ Applicant requested 306.00 in assistance on her application. The utility bill she submitted with her application showed a total due of \$306.40.

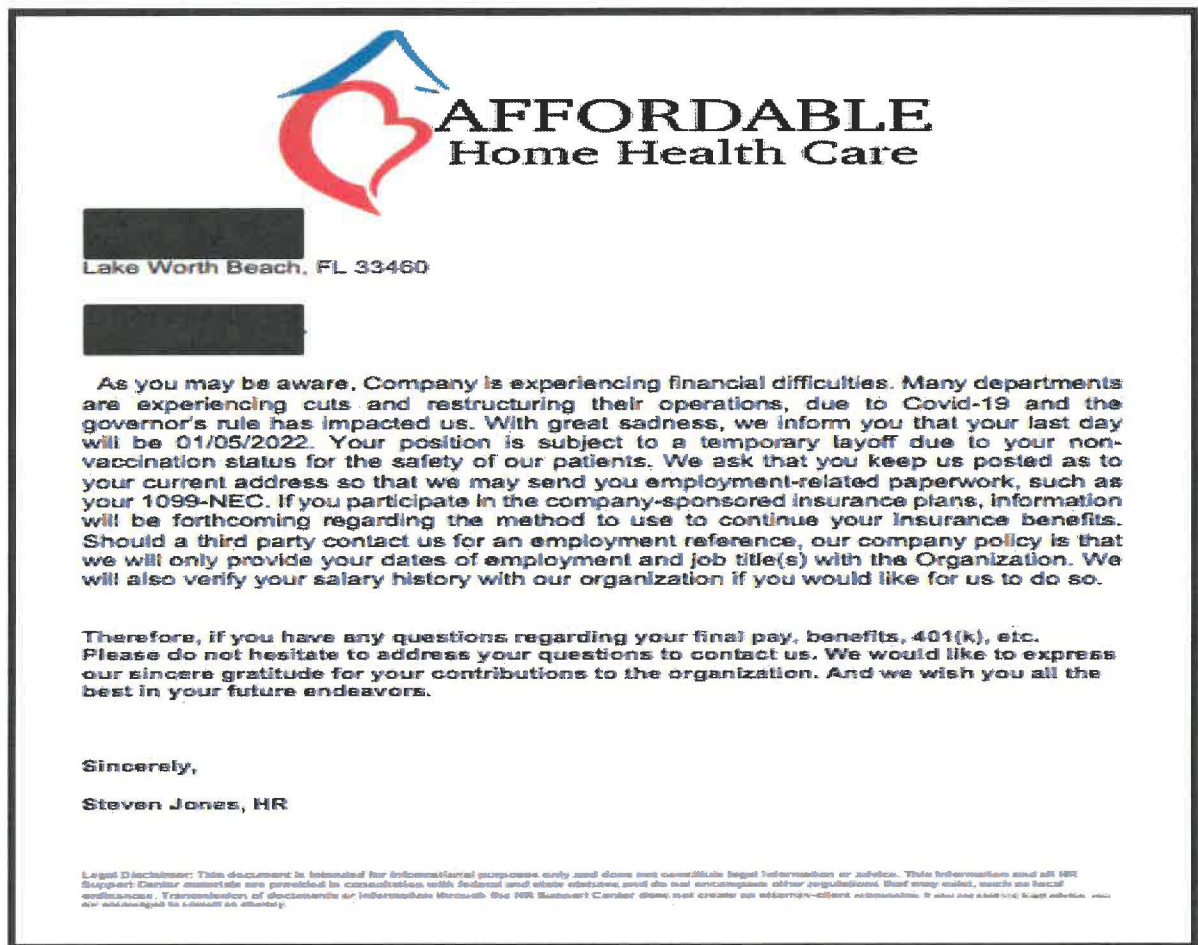
²⁰ Applicant requested \$146.00 in assistance on her application. The utility bill she submitted with her application showed a total due of \$145.96.

In the Declaration of Crisis section of the application, the application states, "I just gave birth to a newborn and as well looking for a new job and I'm on the edge of getting evicted with my three children and currently don't have anywhere to go."

Declaration of Crisis (Please Explain the reason for your Crisis Situation below): *
I just gave birth to a newborn and as well looking for a new job and I'm on the edge of getting evicted with my three children and currently don't have anywhere to go.

The County returned the application on July 21, 2022 and requested additional information, including proof of COVID crisis and a current government assistance letter. The application was resubmitted on July 22, 2022. The County again returned the application on August 2, 2022 and requested additional information, including Applicant's August 2022 water bill and July 2022 electric bill. The application was resubmitted on August 2, 2022. The County again returned it to her on that same date, requesting that she upload her rental ledger. The application was resubmitted on August 4, 2022.

The supporting documents submitted with this application included a letter purporting to be from Affordable Home Health Care, which was nearly identical to the letter submitted with application No. 113627.



On August 14, 2022 the County made final approval of the water utility assistance. On August 21, 2022, the County denied Applicant' rent assistance application, stating, "client has used various employment letters in prior applications—same exact letter from different companies..." On August 24, 2022 the County made final approval of the electric utility assistance.

Payment to Palm Beach County Water Utilities Department

County records show that on August 15, 2022, the County issued payment of \$145.96²¹ to Palm Beach County Water Utilities Department on behalf of Applicant.

²¹ The \$145.96 payment on behalf of Applicant was included in County check number 00003299737 to Palm Beach County Water Utilities Department in the amount of \$1,084.67.

Payment to Lake Worth Utilities

County records show that on August 25, 2022, the County issued payment of \$306.40²² to Lake Worth Utilities on behalf of Applicant.

OIG Interview of Affordable Home Health Care Case Coordinator

The Affordable Home Health Care Case Coordinator told the OIG she handles human resources for Affordable Home Health Care and has access to employee files. She told the OIG that Applicant began working for Affordable Home Health Care in 2010 as an independent caregiver. The Affordable Home Health Care Case Coordinator stated that Applicant was not terminated, furloughed, or laid off due to the pandemic.

The OIG showed the Affordable Home Health Care Case Coordinator the letters purportedly from Affordable Home Health Care and signed by Steven Jones. She stated Mr. Jones was the company's former owner. In a follow up interview, she told the OIG that she spoke to Mr. Jones about the letter and he told her that he did not write nor did he give permission for anyone to write the letter.

OIG Interview of the Aviara Florida Property Manager

The OIG provided the Property Manager for Aviara Florida, with a copy of the letter purportedly from Aviara Florida Properties submitted with application No. 75033. She stated that she provided a letter to Applicant, but the letter did not have the company's letterhead on it. She stated that Applicant altered the original letter.

OIG Interview of the Cheney Brothers Senior Director of Human Resources

The OIG interviewed the Senior Director of Human Resources of Cheney Brothers. The OIG showed her the layoff letter for her alleged "Significant Other" purporting to be from Cheney Brothers and signed by Carlos Cruz that was submitted with applications No. 75033 and 81995. The Cheney Brothers Senior Director of Human Resources stated that the letter was not from Cheney Brothers. She said Carlos Cruz is not an HR representative for the company, and no one by the name of Carlos Cruz has ever worked for Cheney Brothers in Human Resources.

The Cheney Brothers Senior Director of Human Resources told the OIG that the individual never worked for the company. She said the earnings statements submitted to the County with his name resembled those issued by her company, but the file number (also known as the employee number) listed on the statements belongs to a different person.

²² The \$306.40 payment on behalf of Applicant was included in County check number 00003301352 to Lake Worth Utilities in the amount of \$1,489.64.

OIG Interview of Applicant

Applicant told the OIG that she stopped working in November 2021 because she was expecting a child. She learned about the rental assistance program through family friend Prosper Joseph, who resided with Applicant's mother. Mr. Joseph knew about the rental assistance program as he had previously helped Applicant's niece complete a successful application.

Applicant stated Mr. Joseph asked her to provide him with a copy of her lease, water bill, and light bill. She said she provided the requested documents for use with her assistance applications, but did not give him any other documents. Applicant further stated she did not pay Mr. Joseph any money for helping her complete her applications. Applicant remembered applying and getting approved for rental assistance three times, but she was not asked whether the rental assistance was from the County or the State of Florida.

Applicant stated that Mr. Joseph had access to her online rental assistance portal with the County, and she allowed him to be in charge of "everything" on her behalf. She stated that there were times that Mr. Joseph told her that he spoke with Community Services on her behalf and that he was keeping track of her application.

The OIG showed Applicant the employer letter purportedly from Virgo Health Service. She told the OIG that the name Kemari Bryant, the Human Resources representative listed on the employer letter for Virgo Health Service, is an alias Mr. Joseph sometimes uses. Applicant stated she did not provide this document to the County, and that it was "probably" obtained by Mr. Joseph and was "not legitimate." Applicant was also shown the earnings statements submitted with her applications purportedly from Virgo Health Service. Applicant stated, "I don't work for Virgo Health Services. These aren't real check stubs..." Applicant stated that she knows nothing about Virgo Health Service and has never worked for the company.

The OIG showed Applicant a copy of the driver's license of her alleged "Significant Other," earnings statements, and purported employer letter submitted with her applications. She stated that she did not upload her alleged "Significant Other's" driver's license to the rental assistance portal and he was not living in the home at the time she applied for rental assistance. She said he never worked for Cheney Brothers, and she had no knowledge of the earnings statements and letter. She further stated that the documents are "not legitimate," as he never worked there.

The OIG showed Applicant the employer letter purportedly from Walmart dated March 20, 2020. She stated she has not worked for Walmart since 2016, and that it is not a true and accurate letter. She said Mr. Joseph knows that she worked for Walmart in the past and he is the person who completed this application. She also stated Joe Bryant, the name of the Human Resources representative listed on the letter, is another alias Mr. Joseph uses.

Applicant stated she did not create the Walmart and Virgo Health Service letters, and she had never seen them prior to speaking with the OIG.

The OIG showed Applicant the letter purportedly from Aviara Florida Properties that was submitted with application 75033. She stated that this was a true and accurate document created by Aviara. Applicant was also shown the letter provided to the OIG by Aviara Florida Properties without a letterhead. She stated she did not know if this was the same letter sent to her by Aviara. Applicant told the OIG that Mr. Joseph uploaded all of the records submitted to the County on her behalf, with the exception of her lease.

The OIG showed Applicant the letter purportedly from Affordable Home Health Care. She stated she got the letter from Steve, the former owner. When the OIG told Applicant that a case coordinator who handles human resources for Affordable Home Health Care said the company's owner did not create this letter, she reiterated that it is real. While viewing the letter, Applicant stated "this doesn't even seem right because I don't even get paid benefits. I'm an independent contractor." She then stated that Steve wrote her a letter, but Mr. Joseph must have edited it because she did not get benefits as part of her employment as an independent contractor.

In a follow-up OIG interview, Applicant told the OIG that she was not aware that four rental assistance applications had been submitted in her name to the County. She stated that she only remembers submitting two rental assistance applications. Applicant told the OIG that she is the person who clicked the button to submit those two applications into the portal.

OIG Interview of Prosper Joseph

Mr. Joseph told the OIG he used to have a credit services business. He learned about the Palm Beach County Rental Assistance program through the Florida Department of Children and Families (DCF). DCF told him there was a program open to Palm Beach County residents who had trouble making rental or utility payments. Mr. Joseph shared that information on social media. He also informed some of his clients that this program was available and he was willing to help. Mr. Joseph said he assisted his clients in the rental assistance process by answering their questions in order to complete the application.

Mr. Joseph has known Applicant since around 2013, and he helped her with her rental assistance applications. He had her fill out her applications and then review them. Based upon his review, he would tell her if he recommended that she submit the application or if she needed to make changes. He said he also had direct access to Applicant's application portal.

Mr. Joseph said the County required a support letter, Applicant's identification documents, and her children's information. Applicant provided those documents, but Mr. Joseph had to contact Walmart in order to get a letter on Applicant's behalf. He said Walmart provided him with a generic letter.

The OIG showed Mr. Joseph the employment letter on Walmart letterhead that was submitted with Applicant's rental assistance application. He said he did not upload this document. He believes he had Applicant upload the document because he did not have internet access at the time. Mr. Joseph said that this was not an actual document from Walmart. He said he drafted this letter based on what the representative from Walmart told him the letter would say. Mr. Joseph told Applicant that they could not submit the letter he wrote. According to Mr. Joseph, he did not upload the Walmart letter to the application, but Applicant did. When asked why he provided Applicant with the Walmart letter if she could not use it, Mr. Joseph said it was "for educational purposes only."

Mr. Joseph stated Virgo Health Services is a home health care company that he and Applicant were trying to start. He said Applicant was considered his employee, and she worked for him for about six months starting around the end of 2020. The OIG showed Mr. Joseph the letter on Virgo Health Service letterhead that was uploaded with Applicant's rental assistance application, purportedly signed by Kemari Bryant. He said Kemari Bryant is an alias that he uses, but it should not have been used on this document. Mr. Joseph said he wrote this letter with wording based on the conversation he had with the Walmart representative. He did not upload this letter to the rental assistance portal, but he provided it to Applicant to upload.

Mr. Joseph was also shown an earnings statement from Virgo Health Services that was uploaded with Applicant's rental assistance application. He said it was an actual earnings statement that he created through QuickBooks, the payment processor that he was using at the time.

The OIG showed Mr. Joseph the employment letter on Affordable Home Healthcare letterhead that was uploaded with Applicant's rental assistance application. He stated this letter was not given to him, but he knows that Mr. Jones owned the company. Mr. Joseph did not recall uploading that letter.

The OIG showed Mr. Joseph the letter purportedly from Cheney Brothers that was uploaded with Applicant's rental assistance application. He did not recall drafting this letter. Mr. Joseph was also shown an earnings statement purportedly from Cheney Brothers that was uploaded with Applicant's rental assistance application. He remembered Applicant providing him with an earnings statement, but he did not upload it.

When the OIG told Mr. Joseph that Applicant said that many of the documents shown to her were created and uploaded by Mr. Joseph, he said that was not true. He said he can verify some of the letters, and he "cannot agree" that he fabricated "all" of the letters.

Mr. Joseph said he did not receive any money for creating any of the documents, nor did he receive any money from assisting Applicant in the rental application process. He also said he never uploaded any documents to Applicant's rental assistance portal without her knowledge.

Conclusion

Assistance applications Nos. 64167, 75033, 90113, 113627, 141688, and 81995 were submitted to the County on Applicant's behalf. Applicant told the OIG that Mr. Joseph assisted her with submitting those applications. Applicant stated to the OIG that she gave Mr. Joseph documents needed for her applications and access to her application portal, and that he uploaded all documents on her behalf, except her lease agreement.

During our interview with Applicant, we showed her documents submitted on her behalf. She said Mr. Joseph "must have" edited some of the submitted documents and that other documents were "not legitimate."

She, however, acknowledged that she "clicked the button" to submit at least two applications submitted with the County with Mr. Joseph's assistance. Each of the applications submitted by her or on her behalf contained an attestation that the information provided was accurate and that the applicant understood that any falsification or misrepresentation is just cause for denial of services and prosecution for fraud.

Mr. Joseph acknowledged creating employment letters in support of Applicant's applications. The OIG also interviewed individuals with knowledge of the information in those employment letters who told the OIG that the letters were false. Based upon our review of documents and the statements of Applicant, Mr. Joseph, and the company representatives, we found that Applicant and Mr. Joseph acted together to submit falsified documents to the County in support of Applicant's applications..

As a result, the County issued a total of \$15,004.39 in grant funding on Applicant' behalf.

The allegation is **supported**.

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Identified Costs: \$15,004.39

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 \$15,004.39 of inappropriately issued funds.

RESPONSE FROM MANAGEMENT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, 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 2023-0002. The Community Services Department will seek reimbursement for \$15,004.39 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 was provided the opportunity to submit a written explanation or rebuttal to the finding as stated in the Investigative Report within ten (10) calendar days. The Applicant did not submit a response.

RESPONSE FROM SUBJECT

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

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