



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)(f)1, F.S.

Investigative Report

2021-0002

**False Representations on
CARES Act Rental Assistance
Applications**

September 28, 2021



OFFICE OF INSPECTOR GENERAL
PALM BEACH COUNTY



INVESTIGATIVE REPORT
2021-0002

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DATE ISSUED: SEPTEMBER 28, 2021

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SUMMARY

WHAT WE DID

On December 15, 2020, the Palm Beach County (County) Community Services Department (Community Services) referred a complaint to the Palm Beach County Office of Inspector General (OIG) concerning [REDACTED] application to the County Coronavirus Aid, Relief, and Economic Security (CARES) Act-Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program (Program). [REDACTED] landlord, [REDACTED] contacted Community Services and alleged that [REDACTED] "forged [his] signature" on COVID assistance documents in order to receive rental assistance funds. He further alleged that [REDACTED] and her co-tenant, [REDACTED], were fully employed and had no lapse in income. According to [REDACTED], instead of paying rent, [REDACTED] saved the money and purchased a home.

Based upon our initial review of [REDACTED] applications, accompanying documents, and Program guidelines, the OIG initiated an investigation of the following allegations:

Property photographs and personal identifying information of an applicant for or a participant in a federal, state, or local housing assistance program for the purpose of disaster recovery assistance for a presidentially declared disaster are confidential and exempt. Section 119.071(5)(f)1., F.S.

Allegation (1): [REDACTED] provided false information in her rental assistance applications.

Allegation (2): [REDACTED] had more than \$5,000 in liquid assets in checking, savings, and cash card balances at the time of her application for rental assistance; therefore, she did not meet the eligibility requirements for the Program.

Our office reviewed [REDACTED] rental assistance applications and the supporting documentation she submitted to the County; the Program guidelines and eligibility requirements; and [REDACTED] financial records. We also

interviewed [REDACTED], [REDACTED] and County personnel.

WHAT WE FOUND

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

Allegation (2) is supported. We found that on the date of her first rental assistance application, [REDACTED] bank accounts had a total balance of

\$12,668.42, which exceeded the \$5,000.00 maximum threshold for Program eligibility.

The rental assistance payment to [REDACTED] [REDACTED] resulted in Identified Costs¹ of \$10,000.00, which [REDACTED] should reimburse to the County.

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

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

WHAT WE RECOMMEND

We make one recommendation; that the County seek reimbursement of \$10,000 in issued funds from [REDACTED]

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, 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 Act² 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 Program was designed to utilize CARES Act funds to provide 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,

- Applicant must reside within the corporate limits of Palm Beach County.
- Applicant(s) must meet gross annual incomes not exceeding 140% of Area Median Income (AMI) limits prior to COVID-19 established by HUD for the jurisdiction of Palm Beach County, FL.
-
- Applicant(s) must have documentable information to evidence loss of income, reduction in hours, or unemployment because of the COVID-19 pandemic that contributed to the missed rental payments.
-
- Applicant (s) must have less than \$5,000 in liquid assets in checking, savings, and cash card balances.

² The legislation is the largest economic stimulus package in U.S. history, amounting to 10% of total U.S. gross domestic Product.

Rental Assistance Applications

The County accepted applications electronically on the Community Services Online System for Community Access to Resources and Social Services (OSCARSS). OSCARSS required applicants to upload certain supporting documentation, including identification, a rental lease agreement, and a balance statement. Per the balance statement form, 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.



Applications were assigned to a Community Services reviewer. The reviewer reviewed whether the applicant submitted all required information and whether the submission had discrepancies. If information was missing or if information submitted was inconsistent, the reviewer would return the application to the applicant, noting missing or inconsistent items. If applicants met the income guidelines and submitted appropriate documentation, and their landlord had registered or was in the process of registering with the County as a vendor, the reviewer would send the application for supervisory review. Thereafter, the application was submitted to Community Services fiscal personnel, and then to the County Clerk & Comptroller's Office for payment processing.

Applicants had to check a box next to 13 certifications, affirmations, and acknowledgements.

Included among those certifications were the following:

- This application is a result of a Temporary Loss of Income due to the current Corona-virus (COVID-19) outbreak.
- I further certify that I have read, the above information and, to the best of my knowledge and belief, the information is accurate and has been properly recorded. Additionally, I understand that I am responsible for the accuracy of the information provided and that said information will be used as a basis for determining my eligibility for services. **I also understand that any falsification or misrepresentation of this information is just cause for denial of services and prosecution for fraud.** [Emphasis added]

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

Upon the approval of applications for rental assistance, the County paid funds directly to the applicant's landlord. In order to be paid, the landlord had to register as a vendor with the County. If not already registered, the County sent the landlord a link to a portal to complete the vendor registration process.

ALLEGATIONS AND FINDINGS**Allegation (1):**

██████████ *provided false information in her rental assistance applications.*

Governing Directives:

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

Finding:


The information obtained **supports** the allegation.

██████████ Rental Assistance Applications

County records show ██████████ electronically signed and submitted her first rental assistance application, number 27107, into the OSCARSS system on August 3, 2020, and her second application, number 48379, on November 12, 2020. The second application was returned for additional information and re-submitted on November 14, 2020.


Application 27107 was assigned to Community Services case reviewer Felisha Spence. On August 15, 2020, an email was sent to ██████████ requesting that she upload a water bill, a current lease, and a copy of her social security card. The application was processed by a supervisor on August 18, 2020.

The OSCARSS application system contains two separate balance statements for ██████████ ██████████ August 3, 2020 application. On August 3, 2020, a balance statement dated July 1, 2020 with the letters ██████████ handwritten above the landlord's signature line was uploaded to OSCARSS application 27107.



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



██████████
Tenants Name (Print)

██████████
Tenants Name (Print)

Address: ██████████

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$6,525.00

Monthly arrears:

Example: Month <u>April 2011</u>	\$ <u>1000</u>	Late Charges <u>\$50</u>	
Month <u>June</u>	\$ <u>2025</u>	Late Charges <u>150</u>	
Month <u>July</u>	\$ <u>2025</u>	Late Charges <u>150</u>	
Month <u>August</u>	\$ <u>2025</u>	Late Charges <u>150</u>	
Month _____	\$ _____	Late Charges _____	
Month _____	\$ _____	Late Charges _____	

Attorney Fees: \$ 0

Court Cost \$ 0


██████████
Landlords Name (Print)

██████████
Signature

07/01/2020
Date


The second balance statement, dated September 2, 2020, indicates it was electronically signed by ██████████ on that date. A rental assistance payment of \$5,800 was issued to ██████████ landlord, ██████████, on September 9, 2020.

OSCARSS reflects that application 48379 was submitted November 12, 2020. On November 13, 2020, an OSCARSS system-generated email was sent to ██████████ stating her application was being returned because she needed to provide her lease agreement. The application was re-submitted on November 13, 2020, and returned to ██████████ again on that same date, along with an email stating the balance statement and the lease had conflicting information regarding late fees. The application was re-submitted on November 14, 2020, and accepted by the case reviewer on that date. The system also reflects that ██████████ November 14, 2020 application contains a balance statement dated November 12, 2020 with the signature ██████████



**Palm Beach County
COMMUNITY
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Balance Statement
(To be completed by Landlord/Property Manager)



██████████

Tenants Name (Print)

██████████

Tenants Name (Print)

Address: ██████████

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 6,450.00

Monthly arrears:

Example: Month	<u>April 2011</u>	\$ <u>1000</u>	Late Charges	<u>\$50</u>
	Month <u>September</u>	\$ <u>2050</u>	Late Charges	<u>100</u>
	Month <u>October</u>	\$ <u>2050</u>	Late Charges	<u>100</u>
	Month <u>November</u>	\$ <u>2050</u>	Late Charges	<u>100</u>
	Month _____	\$ _____	Late Charges	_____
	Month _____	\$ _____	Late Charges	_____

Attorney Fees: \$ _____

Court Cost \$ _____

██████████

Landlords Name (Print)

██████████

Signature

11/12/2020

Date

The application was processed by a supervisor on November 16, 2020, and a rental assistance payment of \$4,200 was made to ██████████ on November 25, 2020.

OIG Review of ██████████ Employment

██████████ asserted that she lost her employment on April 1, 2020. ██████████ application documents included a Notice of Monetary Determination from the Florida Department of Economic Opportunity, Reemployment Assistance Program dated July 21, 2020, showing that ██████████ was awarded unemployment benefits beginning April 5, 2020. ██████████ bank records showed weekly direct deposits from her former employer, Project and Property, until April 9, 2020, at which point those payments ceased.

Emails from Felisha Spence

Ms. Spence was the Community Services Reviewer assigned to ██████████ August 3, 2020 application. She provided the OIG emails reflecting conversations she had with both ██████████ and ██████████. An August 18, 2020 8:30 AM email from Ms. Spence to ██████████ stated, in part:

“Please be advised that your application has been accepted. Rent assistance was accepted for June, July and August totaling \$5,800 (maximum assistance)... The vendor registration link (sic) sent to ... Please reply back confirming the receipt of this message.”

An August 18, 2020 11:11 AM email from [REDACTED] to Ms. Spence stated, in part:

“... I also sent [REDACTED] the email we received. Can you please let me know if/when he responds. He’s very hard to get to respond to anything and he’s already been a handful on other matters regarding terms of our lease...”

A September 2, 2020 10:20 AM email from [REDACTED] to Ms. Spence stated, in part:

*“...I am in receipt of your email but I am not sure what you mean in regards to a balance statement that I have sent to PBC. Besides my attorney **I have not sent any items at all to PBC** or to anyone in this regard...[Emphasis added]*

...

Until we were contacted by you we were not aware of the Tenants being affected by Covid... “

A September 2, 2020 10:53 AM email from Ms. Spence to [REDACTED] stated, in part:

“The document attached what (sic) was uploaded by the applicant. I will submit a memo to by (sic) Fiscal department regarding the late fees being \$100 so the processing can continue... The payment is made to the landlord using the information from the vendor registration...”

Attached to the email was a pdf file of a “Balance Statement” document, dated July 1, 2020, and the letters [REDACTED] handwritten above the landlord’s signature line.

In a September 2, 2020, 12:22 PM emailed reply to Ms. Spence, [REDACTED] wrote the following:

Felisha

*I wanted to make sure I let you know that **I did not send this document nor is that my signature on the document.** [Emphasis added] I just want to make sure that is clear.*

Thank you

On September 2, 2020 at 12:25 PM, Ms. Spence replied to [REDACTED] as follows:

“The applicant uploaded it so I was not aware. Would you like me to proceed with processing the application or deny it? Please advise.”

On September 2, 2020 at 1:22 PM, [REDACTED] sent an email to Ms. Spence stating, in part:

“Here is the signed form you requested”

Attached to the email was a pdf file of a “Balance Statement” dated September 2, 2020, and a handwritten signature which appears to read [REDACTED] in the space for the landlord’s signature.

Payments to [REDACTED]

On September 9, 2020, County check number 00000003199104, in the amount of \$5,800, was issued to NuView IRA Inc FBO [REDACTED] IRA. On November 25, 2020, County check number 00000003215139, in the amount of \$4,200, was issued to NuView IRA Inc FBO [REDACTED] IRA. Both are reflected in County records as rental payments on behalf of [REDACTED]. NuView IRA records provided to OIG by [REDACTED] confirmed that the checks were electronically deposited into his account.

Interview of [REDACTED]

[REDACTED] stated [REDACTED] and her co-tenant [REDACTED] resided at a property owned by [REDACTED] land trust, which is held in the name, “NuView IRA FBO [REDACTED].” [REDACTED] has had multiple issues with [REDACTED], including her cancelling rent checks she sent to NuView.

[REDACTED] said that on July 1, 2020, [REDACTED] forged his signature on a document, and submitted it with an application to a County COVID Assistance Program [REDACTED] first became aware of the matter when he was contacted by the County regarding vendor registration. He was told that [REDACTED] had submitted a document that [REDACTED] had filled out and signed. [REDACTED] told the OIG that when he advised the County personnel that he did not sign any such document, the County personnel produced a balance statement document with his signature forged.

[REDACTED] said he was then told that [REDACTED] needed assistance with her rent and was asked whether he wanted to help or stop the process. He agreed to allow the process to move forward, but said he would only do it one time. It was his understanding that there were no employment issues, but rather that [REDACTED] was simply not paying rent. [REDACTED] completed and signed electronically the balance statement for [REDACTED] application. He was sent a link to complete the vendor registration and the balance statement. He stated [REDACTED] received \$5,800 in assistance from the program, which was directly deposited into NuView IRA.

██████████ stated another direct deposit, in the amount of \$4,200, was made into the NuView IRA account from the County on or about December 4, 2020. He said he never signed or approved any balance statement or other documents regarding this transaction.

██████████ stated that ██████████ purchased a home in December 2020. He believes that she used the money she had saved from not paying rent as a down payment to purchase that home. He said that ██████████ stopped paying rent in April 2020 and told him she did not have to pay, using the COVID-19 pandemic as an excuse.

Interview of Felisha Spence

Ms. Spence stated that on ██████████ August 3, 2020 application, in the space for the landlord's email address, it states ██████████ Ms. Spence corresponded with ██████████ via email and thinks ██████████ may have received the link for the landlord to register as a vendor. ██████████ said she would forward the link to ██████████

Ms. Spence had several email exchanges with ██████████ She explained to him that there was a discrepancy between the late fee listed on the lease and the late fee indicated on the landlord's balance sheet, and asked for clarification. She also told him that she had noticed that the vendor registration email had been sent to the wrong email address and asked if he needed the link re-sent. Ms. Spence believes that ██████████ must have agreed to move forward with ██████████ application; otherwise, she would not have proceeded. Ms. Spence has had such situations occur on other occasions.

Ms. Spence said Community Services has had applicants who have registered themselves as a vendor, pretending to be a landlord. She further stated that this assistance program allowed for applicants to print the balance statement off the website, complete it, and submit it. She said the applicants were supposed to take it to the landlord for completion, but some have not actually done so.

OIG Interview of County Information Systems Services Integrator Dicky Komalan

Ms. Komalan explained to the OIG that there were two ways to include a balance statement with an application. Either the applicant could upload a hard copy of a balance statement or a link could be sent directly to the landlord to allow the landlord to register for a County vendor code and input the the tenant's past due rent information. The system then created a balance statement based on the information the landlord entered. The system-generated balance statement had the "Electronically signed by" label at the bottom to show the landlord's name, whereas the version of the form that would be uploaded had a space at the bottom for the landlord's signature.

Ms. Komalan further explained **it would have been impossible for a landlord to have independently uploaded a balance statement to an application [Emphasis added]**, because the applicant was required to log in with a password in order to upload

documents. No one other than the applicant and Community Services personnel could upload documents.

Interview of ██████████

██████████ stated she lost her job on April 1, 2020 because her employer was downsizing due to the COVID-19 pandemic. At the time, she was in the midst of issues with her landlord and was exploring legal options, including withholding rent. She had paid her rent through March 2020. ██████████ became aware of CARES Act funds available through Community Services and decided that she would apply for the rental assistance since she was out of work and not yet receiving unemployment. Her intention was that if approved she would pay her rent, and if not she would pursue legal action regarding her lease.

██████████ said she applied for rental assistance and was approved. She spoke with Ms. Spence multiple times throughout the process. ██████████ copied ██████████ on the application, and Ms. Spence sent ██████████ the electronic link for his portion of the application. ██████████ said she sent ██████████ an email stating he would be getting his rental funds, but that he would need to do his part of it. She said he never responded to her, but he did do his part and got whatever rent was past due.

██████████ said that toward the end of her lease she applied again for assistance and was approved, and ██████████ was again paid. She had been uncertain as to whether she would pay her rent, but since the County offered the Program, she applied.

██████████ understanding of the assistance Program was that it was rental assistance for anyone who suffered a financial loss due to having been affected by COVID. She read through the application information, spoke to Ms. Spence about it multiple times, and submitted everything that was requested.

██████████ did the main application. She believes that Ms. Spence sent ██████████ a link to become a vendor in the portal and send in his W-9³ "and do the rest of it." ██████████ said the Balance Statement, the W-9, and registering as a vendor were ██████████ share of the process. ██████████ said she did not forge ██████████ signature on the statements dated July 2020 and November 2020, and that the signatures on the documents belong to ██████████

Regarding her second Program application with the County, ██████████ does not recall the details of the process. She does not recall how ██████████ completed his part of the application, nor whether she did her part first or he did his.

██████████ stated she did not intend to do anything wrong, and does not think she did. She said that at the time her applications were submitted, all of the information in them

³ A Form W-9 is an IRS form used by entities to provide their Taxpayer Identification Number.

was true and correct. She further said that when she completed her application she read the Program guidelines and FAQs, and “It seemed pretty straightforward”.

OIG Conclusion

The OIG’s review showed that a balance statement dated July 1, 2020 and bearing the handwritten initials [REDACTED] above the landlord’s signature line was submitted with [REDACTED] Rental Assistance applications on August 3, 2020. Her landlord, [REDACTED] advised the OIG that he did not prepare the balance statement nor affix his initials to it. He indicated that he did submit electronically a balance sheet to the County on September 2, 2020. Thereafter, he received a payment for \$5,800 for [REDACTED] past due rent.

On November 14, 2020, a balance sheet dated November 12, 2020 was uploaded to the County system relating to her second application for rental assistance. She advised the OIG that she did not recall how [REDACTED] completed his part of the application, nor whether she did her part first or he did his. [REDACTED] said she did not forge [REDACTED] signature on the balance statements, and that the signatures on the documents belong to [REDACTED]. [REDACTED], however, advised the OIG that he did not prepare nor sign this balance statement. [REDACTED] received a payment for \$4,200 based on this application.

Based on the totality of the evidence, we conclude that [REDACTED] applications included balance sheets that contained false representations that the information had been prepared by and signed by [REDACTED]. The allegation is **supported**.

Allegation (2):

[REDACTED] had more than \$5,000 in liquid assets in checking, savings, and cash card balances at the time of her first application for rental assistance; She therefore did not meet the eligibility requirements for the CARES Act- Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program.

Governing Directives:

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


Finding:

The information obtained **supports** the allegation.


[REDACTED] Financial Disclosures on her OSCARSS Application

The OIG contacted Palm Beach County Information Systems Services (ISS) and obtained the electronic verification dates for [REDACTED] applications and uploaded supporting documents.

ISS told the OIG that the original date of submission for [REDACTED] application number 27107 was August 3, 2020, and the original date of submission for application number 48379 was November 12, 2020. This August 3, 2020 submission date is reflected on her application:



OSCARSS APPLICATION: 27107




[REDACTED]

Print Name


08/03/2020

Submitted Date

In that application, [REDACTED] disclosed a checking account balance of \$1,700.00 and a savings account balance of \$140.00:



OSCARSS APPLICATION: 27107



Annual Household Income		
Description		
Annual Income Prior to COVID-19 Crisis	\$48,000.00	\$52,000.00
Checking Account Balance		\$1,700.00
Savings Account Balance		\$140.00
Unemployment Wages (Last 2 Months)		\$275.00

A bank statement for the period from June 10, 2020 through July 9, 2020 relating to a checking account held jointly with [REDACTED] with an ending balance of \$1,820.48 was uploaded to [REDACTED] application number 27107 on August 3, 2020. Although the application stated that the balance of that joint checking account on August 3, 2020 was \$1,700.00, the actual balance of the account was \$2,102.06.

Additionally, the application stated that on August 3, 2020, [REDACTED] also had a savings account with a balance of \$140.00. The actual balance of the savings account held jointly with [REDACTED] was \$163.02.

[REDACTED] Bank Records

The OIG reviewed records that revealed on August 3, 2020, [REDACTED] had multiple bank accounts with balances, as follows:

Type of Account	Ownership of Account	Balance on August 3, 2020
Checking	Sole	\$10,403.34
Checking ⁴	Joint	\$2,102.06
Savings	Joint	\$163.02
Total		\$12,668.42

House Purchase

The OIG reviewed records related to [REDACTED] purchase of a house in December of 2020. Palm Beach County Property Appraiser records confirmed this purchase. [REDACTED] provided the OIG with a letter from an individual who attested to a \$2,100 gift to [REDACTED] on December 1, 2020.

OIG Interview of [REDACTED]

[REDACTED] said she submitted bank account information that Ms. Spence asked for with her application. She told the OIG that she has more than one bank account but did not submit statements for all of them. The only one she said she submitted was the one she described as her primary account.

[REDACTED] stated that her parents and a friend gave her the funding that she used for her house purchase down payment, and that the allegation that she used her own money to purchase a house is not true.

OIG Conclusion

OIG review of records shows that on August 3, 2020, at the time of her submission of her first rental assistance application [REDACTED] bank account balance exceeded the \$5,000.00 maximum threshold under the program's guidelines, making her ineligible to receive the benefit of \$5,800.00 in rental assistance paid to her landlord on September 9, 2020.

While [REDACTED] stated that she did not have a balance above \$5,000 in her collective bank accounts, she admitted that she only disclosed one of her bank accounts. While the account she disclosed had a balance under \$5,000, collectively, her bank accounts had a balance of \$12,668.42 on that date.

The allegation is **supported**.

⁴ This account corresponds with the bank account [REDACTED] uploaded in support of her Program application.

IDENTIFIED COSTS

Identified Costs: \$10,000.00

Finding	Description	Identified Costs
1	False representation on balance sheet	\$4,200.00
2	Exceeded Program's financial requirements	\$5,800.00
	Total Identified Costs	\$10,000.00

ACKNOWLEDGEMENT

The Inspector General's Investigations Division would like to thank the Palm Beach County Community Services Department staff and Information Systems Services staff for their cooperation throughout this investigation.

RECOMMENDED CORRECTIVE ACTION

The OIG recommends that the County seek reimbursement from [REDACTED] of \$10,000.00 in issued funds.

RESPONSE FROM MANAGEMENT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Community Services was provided the opportunity to submit a written explanation or rebuttal to the findings and recommendation as stated in this Investigative Report within ten (10) calendar days. On September 24, 2021, Community Services provided the following response:

The County concurs with the IG recommendation included in OIG Investigation 2021-0002. The County will consider pursuing action to recoup the \$10,000 or other actions to remedy issues associated with this application.

RESPONSE FROM [REDACTED]

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

OIG RESPONSE TO [REDACTED]

After receipt of [REDACTED] response, the OIG interviewed multiple County ISS employees and re-examined the computer logs for [REDACTED] submission of her Rental Assistance application. We confirmed that:

1. ██████████ application dated August 3, 2020 was **originally** submitted on August 3, 2020. It was also created on that date. It was not submitted prior to that date and then resubmitted on August 3.
2. ██████████ did not upload any documents now associated with her applications prior to August 3, 2020.

ISS provided the OIG with the computer log for that original submission:

Application creation date

The screenshot shows a data table with a toolbar at the top. The toolbar includes various icons for filtering, sorting, and refreshing. On the right side of the toolbar, there are four checkboxes: 'Sort by PK' (unchecked), 'Desc' (unchecked), 'Read Only' (unchecked), and 'Auto Refresh' (unchecked).

APPLICATION_SEQ	CLIENT_SEQ	ACCOUNT_HOLDER_SEQ	APPLICATION_DATE	END_DATE	PREFERRED_SITE	STATUS
27107	72061	25379	8/3/2020 6:40:58 PM			3

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

ATTACHMENT A

Gentlemen,

Following the email of the draft sent to me this morning and my subsequent phone conversation with Mr. Dyckman, I have had a chance to put my emotions, reaction and being completely blindsided off for a second and would like to formally respond to the Allegations of [REDACTED] as he reported them to the County and ultimately, your office.

As indicated in your email, the allegations that you investigated were:

Allegation (1): [REDACTED] provided false information in her rental assistance applications.

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

Allegation (2): [REDACTED] had more than \$5,000 in liquid assets in checking, savings, and cash card balances at the time of her application for rental assistance; therefore, she did not meet the eligibility requirements for the Program.

Allegation (2) is supported. We found that on the date of her first rental assistance application, [REDACTED] bank accounts had a total balance of \$12,668.42, which exceeded the \$5,000.00 maximum threshold for Program eligibility.

PLEASE Understand that I take these allegations very seriously, but they are completely false. In reference to the first allegation; I did not falsify documents. That is simply not true. In reference to the second allegation; It is also, respectfully, inaccurate, I applied in early July 2020 (I believe on or before 7/1/2020) to the County for CARES rental assistance. I took the afternoon off work early to meet with and showed Mr. Dyckman multiple documents, including those bank statements and he said that he had them. I understand what you think your findings were based on the inaccuracy of the dates, but the dates are not correct in your report. This is a huge misunderstanding. I gave you substantial documents that prove the opposite. These are not true, I DID lose my job due to covid and applied in financial hardship and duress before I received the 5 month late wave of backdated Pandemic Unemployment. The state took forever to process my unemployment due to the overwhelming loss in jobs because of COVID. I had no other option than to apply for the assistance. I was home trying to make ends meet, unable to get unemployment, struggling on one income and had three children to shelter and provide for during a terrible worldwide crisis and pandemic. I did not take advantage. My application was submitted on or before July 1st, before those funds ever came and we WERE struggling, when I submitted the application online, I was truthful, I absolutely qualified for the assistance.

- Applicant must reside within the corporate limits of Palm Beach County. **(We did qualify)**
- Applicant(s) must meet gross annual incomes not exceeding 140% of Area Median Income (AMI) limits prior to COVID-19 established by HUD for the jurisdiction of Palm Beach County, FL. **(We did qualify)**
- Applicant(s) must have documentable information to evidence loss of income, reduction in hours, or unemployment because of the COVID-19 pandemic that contributed to the missed rental payments. **(We did qualify)**

- Applicant (s) must have less than \$5,000 in liquid assets in checking, savings, and cash card balances. (**We did qualify, On July 1, 2020, when I submitted my application, I did have significantly less than \$5,000 in the banks at the time I filled out the application. With bills due and had no idea if or when my taxes or unemployment would even come. At the time I was calling and emailing Unemployment EVERY SINGLE DAY begging for a response, an answer, anything. I was looking for jobs, applying to so many companies every day.**)

Once the funding was approved for the CARES assistance, The rent went directly to the landlord, [REDACTED] I did not *SAVE* that as he accused me of to buy my house. It paid him rent, my father and mother helped with my down payment. It's in my Bank statements that you have copies of. These kinds of false accusations could literally ruin my life, career and future and they're not true. I am mortified that this is even being entertained by [REDACTED] who clearly falsely accused me and is retaliating for us asking him to make necessary repairs to the house during our lease and threatening to stop payment until he does. I am terrified that accusation could ruin me. I did not do what you're claiming. I did not forge anything he sent these. This makes absolutely no sense.

I submitted my application on or before July 1, 2020 in the middle of the night as I had been working on gathering all of the documents for the application, I had to locate identification documents and was sent back for resubmittal by the staff reviewing it multiple times. Which might explain the issue with the "signed date"... I don't know for sure... She sent me back into the portal multiple times to add a document, a license, social security information, tax information, etc. The dates on the forms from the balance statements reflect that date that I applied. At the time I sent it in, my bank account balances were all accurately represented. I went on the apps while I was online filling out the application to see the balance. My accounts through July did not ever exceed \$5,000. It was more often than not, under 1,000.00 in my PNC accounts. And, until I received the back payment from Unemployment, my USAA account was typically under \$100.00. I applied for the utility assistance in the beginning of July as well when I filled out the form online. After not hearing back from the application, I paid my June FPL bill July 10th (reflected on my PNC account statement) because I was worried it would be disconnected and still hadn't heard back on my application. This proves that these dates are off and not accurate to my submitting the application initially. I was behind a month on rent, so I applied for June, which I was behind, July and August. Giving us the opportunity to get back on our feet.

Later, November 12, 2020 my parents sent me a cashiers check for 5,000.00 towards my home purchase from a bonus my father received at work, because our landlord had started the eviction process illegally and unwarranted. He knew I was leaving but wanted to make sure he put evictions on our records even if it was dismissed, which it was. I had every intention of leaving. He was still harassing us, showing up unannounced almost daily, leaving the gates open for our dogs to get out and lost, leaving the shed ajar, so many times that the police had to be called because he was trying to enter when my children were home alone and a lot of other very unethical and bully like tactics, like illegally turning the power into his name and shutting it off. Later on, Friends gifted me \$2,100 on December 1, 2020 for the remaining balance of the amount needed to complete the purchase on December 3, 2020.

It states in your report *The second balance statement, dated September 2, 2020 (The form is dated 7/1/20)*, indicates it was electronically signed by ██████████ on that date. A rental assistance payment of \$5,800 was issued to ██████████ landlord, ██████████ on September 9, 2020. Again, it took WEEKS for the first assistance to even be reviewed by an agent. These dates are off. And, if the county doesn't have accurate ways of representing true timestamps on that, that's terrible to go back and accuse someone of lying later. Maybe there should be a rule based on providing the links with dates on the forms uploaded? There has to be a way to avoid this from happening to anyone else, I wish I did at that time. But, when I had to provide my documents and statements for my mortgage, they require the time and date stamps. The county should seriously consider that requirement to avoid this from happening to someone else.

In the same, it states that *OSCARSS reflects that application 48379 was submitted November 12, 2020. On November 13, 2020, an OSCARSS system-generated email was sent to ██████████ stating her application was being returned because she needed to provide her lease agreement. The application was re-submitted on November 13, 2020, and returned to ██████████ again on that same date, along with an email stating the balance statement and the lease had conflicting information regarding late fees. The application was re-submitted on November 14, 2020, and accepted by the case reviewer on that date. The system also reflects that ██████████ November 14, 2020 application contains a balance statement dated November 12, 2020 with the signature ██████████* Again, it was definitely NOT processed in one day. This is a totally inaccurate representation of the actual time it took to process and the dates that I submitted true representations for. It's just not right. I'm sure if I looked for other people who received the same assistance, they could verify these truths. Perhaps from the date that it was APPROVED then, to the dates that they were PROCESSED, but definitely not the original submission, prior to it being assigned to the case reviewer or the corrections they had requested being processed.

Regardless of what happens with this investigation, I've learned a valuable life lesson through this and will undoubtedly timestamp and date anything I ever print to submit anywhere ever again, as if it is a bank giving a mortgage. And, I will be reaching out to whoever oversees the application processes for the County to suggest the same.

Meeting ██████████ was a complete nightmare. From the first day I moved into that house, the hot water heater broke as I was taking a shower, he refused to properly fix it. It grounded out and shocked me when I was in the shower and then broke again. Then the AC broke and he did the same, plumbing leaked all over the guest bathroom from a rigged plumbing job under the sink, irrigation broke costing tons in water, it was a nice neighborhood for our children, close to their schools and our friends and family, so we dealt with the nightmare the best we could and tried to just be grateful for what we had and move on. But it was a tense relationship, constantly. He was a slumlord and did whatever he could to collect above market value in rent for a home that he refused any and all repairs on until I threatened to stop paying rent each time. Then he'd fix it with as little effort as possible. In early 2020, I sent legal letters to him for Notices to Cure and similar communication to try to push him to fix things, before I submitted this CARES rental application. He made it very clear he was livid and was going to make my family's life miserable. When a neighbor knew we were struggling pretty badly, after being out of work for months and the Unemployment process taking a huge hit to

their online system processing claims, she suggested I apply online for the Cares assistance for rent to make ends meet until I got back to work. I figured and I told her, I believe that everything happens for a reason, I didn't want to not pay him, so if it was approved, I'd see it as a sign that I needed to let go and let it be until our lease was up and we could move as amicably as possible. It was later approved, so I figured it was what it was and I'd be out of there soon enough... He grew increasingly angry and vengeful and did anything he could to make our lives miserable. Including, but not limited to these accusations. He took the money from this assistance, sent in the forms with his EIN or Social and his information, his signatures. He knew exactly what he was doing. I sent him emails and texts explaining it. Then, he went and did this to retaliate.

I wish I had the courage to reach out to the Governor and local & state representatives to share this story. Brian Mast goes to church with my sister. My mother in law's sister was a local District Representative and will be planning to run again. I knew Sharon Materio for years while she was in office. People should know how inaccurate and inadequate the system is and how the wrong person like [REDACTED] can do this to someone with such little effort, because it's even a possibility. I'm entirely too prideful to admit publicly that I asked for help, and further, that it got this involved and thrown out of whack. It's embarrassing, darn near mortifying. I've been hysterical all day thinking that any job whoever pulls my background check could find this, I just applied to PBSO for God's sake... Then, my children's school, my current employer, our boy scout troop, all do background checks...it's completely mortifying. I certainly hope that it's a fixable misunderstanding and I'm justifiably overreacting. This misrepresentation could ruin my life and was definitely not worth asking for the assistance when I needed it, I'd rather have slept in my car than go through this again.

I am honest. I do not lie. I pride myself on having good moral character and integrity in a time where most people don't anymore and raising my kids that way... I was not raised that way. I have no reason to lie. I do right by everyone I can and do my best to help others whenever I can. This time I needed help, put my pride aside and tried my best to accurately represent the situation, in a crisis, with children to care for and now I am being punished for a year now, with these false accusations, from a man who knew it wasn't true from the beginning. It's disgusting and sad that when people really do need help, the system fails them. This is why people end up on the streets. This is why we have more homeless Veterans than homeless drug addicts. The system fails when we have the ability to do better. It is so sad that in this day and age, the world is as much of a mess as it is.. That asking for help when it's available and necessary, is met with something like this... It's just not right.

Thank you for your time in reading this response, I hope that it falls on open ears and open minds to see the truth for what it is. This is definitely resolvable and honestly, avoidable for anyone in the future.

Have a great day,
[REDACTED]