



John A. Carey
Inspector General

OFFICE OF INSPECTOR GENERAL
PALM BEACH COUNTY



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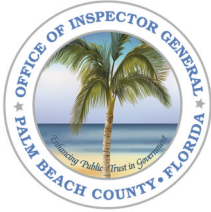
**Redacted Per §119.071(5)(b) and (5)(f)1,
F.S., and 15 U.S.C. §9058a(4)(A)**

Investigative Report

2022-0007

**False Information on Palm
Beach County Emergency
Rental Assistance Program
Lake Park Applications**

December 16, 2022



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INVESTIGATIVE REPORT 2022-0007

DATE ISSUED: December 16, 2022



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FALSE INFORMATION ON PALM BEACH COUNTY EMERGENCY RENTAL ASSISTANCE LAKE PARK APPLICATIONS

SUMMARY

WHAT WE DID

On March 20, 2022, the Palm Beach County (County) Office of Inspector General (OIG) received a complaint from the Palm Beach County Community Services Department (Community Services) concerning [REDACTED]'s (hereafter "Applicant(s)") applications to the County Emergency Rental Assistance program. Community Services alleged the employment documentation Applicant submitted with his applications (Nos. 77039 and 90758) was false, which resulted in his landlord inappropriately receiving \$13,200.00. During the course of our investigation, Applicant submitted an additional rental assistance application (No. 125948) for \$5,800.00 that also contained false information. Community Services did not approve nor fund this application.

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

Allegation (1): Applicant provided false information in his rental assistance

applications, which resulted in improper grant funding from a County program.

Our office reviewed Applicant's rental assistance applications, supporting documents, and the program guidelines. We also interviewed Applicant's employer and attempted to interview Applicant.

WHAT WE FOUND

Allegation (1) is supported. We found that Applicant submitted falsified documents to the County in support of his rental assistance applications.

As a result of his actions, the County approved Applicant's rental assistance applications dated June 16, 2021 and September 24, 2021, and issued payments of \$7,400.00 and \$5,800.00 to Lake Park Manors LLC and Grandview Heights Holdings LLC, respectively. The inappropriate payments resulted in Identified Costs¹ of **\$13,200.00**.

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

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.

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 \$13,200.00 in funds issued inappropriately.

BACKGROUND

Emergency Rental Assistance Program

On March 9, 2021, under the authority of the U.S. Department of Treasury Emergency Rental Assistance (ERA) Program 1 (as established by the Consolidated Appropriations Act, 2021) and 2 (as established by section 3201 of the American Rescue Plan Act of 2021), the Palm Beach County Board of County Commissioners (BCC) approved ERA-1 funding to assist Palm Beach County residents affected by COVID-19 with rental and utility assistance. On August 17, 2021, the BCC approved ERA-2 funding for the same purpose.

Eligible Palm Beach County households are renter households in which one or more individual(s) meets all of the following criteria:

- For ERA-1, qualifies for unemployment or experienced a reduction of household income, incurred significant costs, or experienced other financial hardships **due to** COVID-19 (either directly or indirectly), or for ERA-2, qualifies for unemployment or experienced other financial hardships **during or due to** (either directly or indirectly) COVID-19;
- Demonstrates a risk of homelessness or housing instability; and
- Has a household income at or below 80% of the area median.

Rental Assistance Applications

The County accepted applications electronically on the Community Services Online System for Community Access to Resources and Social Services (OSCARSS). OSCARSS required applicants to upload certain supporting documentation, including identification, a rental lease agreement, and a Balance Statement 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 digitally checking a box next to each one.

The Acknowledgement section for applications No. 77039 and 90785 included the following:

- 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 printed name and submission date.

Community Services assigned applications it received to a Community Services reviewer. The reviewer checked to ensure the application 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 income guidelines, 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.

Property Records for Applicant's Address

The Palm Beach County Property Appraiser's online database shows that Lake Park Manors, LLC owned the multi-unit residential apartment building known as [REDACTED] (hereafter "Applicant Address") from October 2018 until August 2021. Grandview Heights Holdings, LLC purchased the entirety of the property in August 2021. Representatives for Lake Park Manors LLC and Grandview Heights Holding LLC verified that Applicant resided in Apartment [REDACTED] at the time of his County applications.

ALLEGATIONS AND FINDINGS

Allegation (1):

The Applicant provided false information in his rental assistance applications, which resulted in improper grant funding from a County program.

Governing Directives:

Palm Beach County Emergency Rental Assistance Program application and program guidelines.

Finding:

The information obtained **supports** the allegation.

Applicant's First Rental Assistance Application

County records show Applicant electronically signed and submitted rental assistance application number 77039 to the County on June 9, 2021. Applicant listed his address as Applicant Address, and his monthly rent payment as \$1,450.00. He requested assistance for April 2021 through August 2021.

The County returned the application to Applicant on June 10, 2021, and requested additional information, including a copy of his social security card, an updated lease, and proof a Covid-19-related crisis. Applicant resubmitted his application that same date, and on June 11, 2021, the County again returned the application to him for failure to provide requested documents. Applicant resubmitted his application on June 15, 2021, and the County again returned it to him on June 16, 2021, for failure to provide requested information. He resubmitted the application later that same date. Per the OSCARSS review log, the County approved the application on June 28, 2021.

Applicant attested that his crisis was Covid-19 related. In the Declaration of Crisis section of the application, he wrote ***“shorting of hours at work due to covid 19.”*** [Emphasis added]

OSCARSS APPLICATION: 77039

Additional Questions - Self Attestation

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

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

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

At Risk of Homelessness or Housing Instability: *

- Rental Eviction Notice
- Past Due Rent Notice
- Utility Disconnection Notice
- Past Due Utility Notice

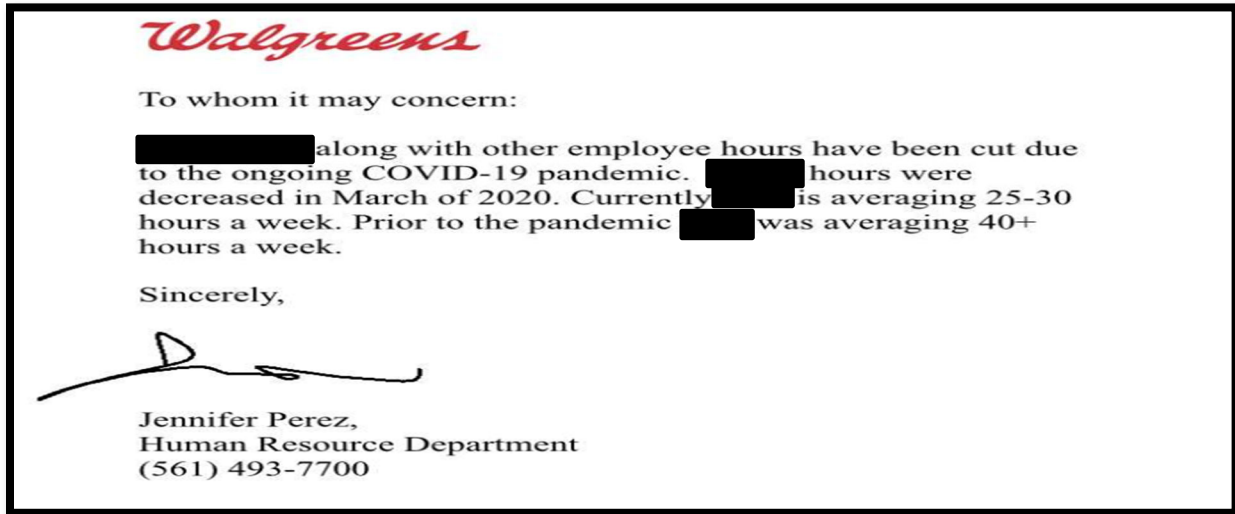
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Declaration of Crisis (Please Explain the reason for your Crisis Situation below): *

shorting of hours at work due to covid 19

Applicant submitted supporting documents with this application that included an undated letter, purporting to be from Walgreens and signed by Jennifer Perez in the Walgreens

Human Resource Department, along with five Walgreens Earnings Statements. The letter had a Walgreens logo and stated as follows:



Applicant submitted five Earnings Statements with pay dates between January 13, 2020 and May 31, 2021² that identified his employer as the Walgreens Distribution Center.

All five Earnings Statements show Applicant’s full name, redacted social security number, and employee number. They also show the employer’s name, phone number, and address, with Jupiter, FL misspelled as **Jupitor**, FL. The March 9, 2020 Earnings Statement reflected 85 hours for the two week reporting period. Although the letter stated that Applicant’s hours decreased in March 2020, the June 15, 2020 Earnings Statement reflected 80 hours for the two week reporting period.

WALGREENS DISTRUBUTION CENTER (561) 493-7900 15998 WALGREENS DR JUPITOR, FL 33478				EARNINGS STATEMENT		
EMPLOYEE NAME/ ADDRESS		EMPLOYEE NO.	REPORTING PERIOD	PAY DATE		
██████████ LAKE PARK, FL 33403		855	12/31/2019 - 01/13/2020	01/13/2020		
INCOME	RATE	HOURS	CURRENT PAY	DEDUCTION	TOTAL	YTD TOTAL
REGULAR	\$18.50	80.00	\$1,480.00	STATUTORY DEDUCTIONS		
OVERTIME	\$27.75	15.00	\$416.25	FICA Medicare	27.50	27.50
				FICA Social Security	117.56	117.56
				Federal Tax	255.25	255.25
				State Tax	0.00	0.00
YTD GROSS	YTD DEDUCTION	YTD NET PAY	TOTAL	DEDUCTION	NET PAY	
\$1,896.25	\$400.32	\$1,495.93	\$1,896.25	\$400.32	\$1,495.93	

² A duplicate of the May 31, 2021 paystub was submitted for application 77039.

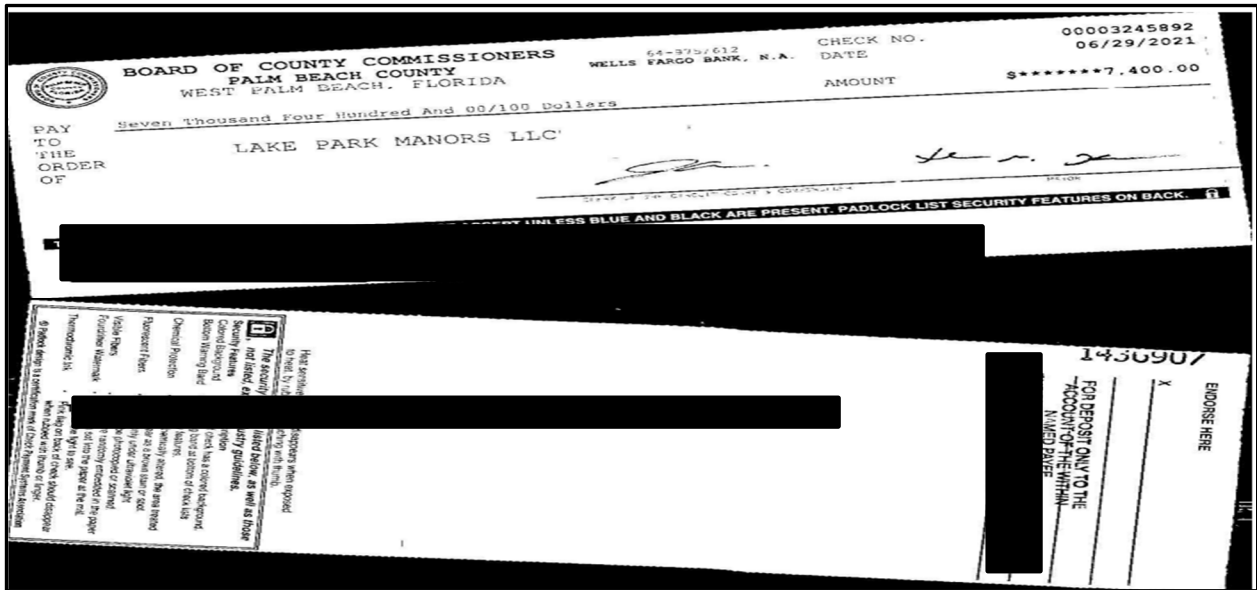
The Walgreens employee number listed on four of the Earnings Statements is 855. The fifth Earnings Statement, showing a pay date of June 15, 2020, listed the employee number as 1055.

WALGREENS DISTRIBUTION CENTER (561) 493-7900 15998 WALGREENS DR JUPITOR, FL 33478				EARNINGS STATEMENT		
EMPLOYEE NAME/ ADDRESS		EMPLOYEE NO.	REPORTING PERIOD	PAY DATE		
[REDACTED]		1055	06/02/2020 - 06/15/2020	06/15/2020		
LAKE PARK, FL 33403						
INCOME	RATE	HOURS	CURRENT PAY	DEDUCTION	TOTAL	YTD TOTAL
REGULAR	\$18.50	80.00	\$1,480.00	STATUTORY DEDUCTIONS		
OVERTIME	\$0.00	0.00	\$0.00	FICA Medicare	21.46	323.92
				FICA Social Security	91.76	1,385.00
				Federal Tax	170.00	2,977.75
				State Tax	0.00	0.00
YTD GROSS	YTD DEDUCTION	YTD NET PAY	TOTAL	DEDUCTION	NET PAY	
\$22,338.75	\$4,686.68	\$17,652.07	\$1,480.00	\$283.22	\$1,196.78	

Applicant certified that these Earnings Statements and all documents he provided were accurate when he electronically signed and submitted his rental assistance application.

Payment to Lake Park Manors LLC

On June 29, 2021, the County issued check number 00003245892 in the amount of \$7,400.00 to Lake Park Manors, LLC for rental assistance, including late fees.



Applicant's Second Rental Assistance Application

County records show Applicant electronically signed and submitted rental assistance application number 90785 on September 21, 2021, seeking rental assistance for October 2021 through January 2022. Applicant listed his address as Applicant Address, and his

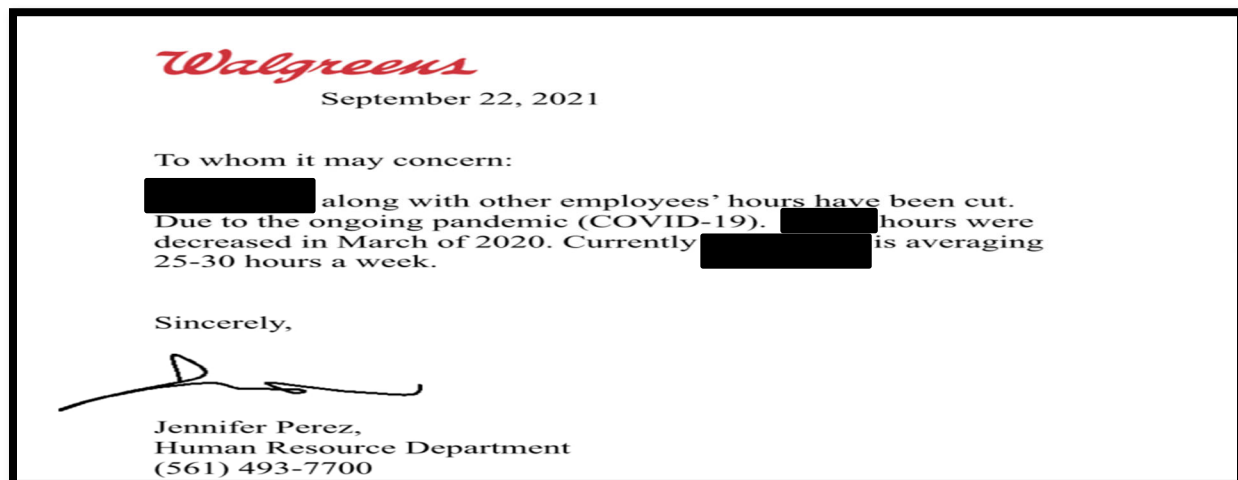
monthly rent payment as \$1,450.00. The County returned the application on September 22, 2021 and requested additional information, including paystubs for the two most recent months, and stating that the attached Walgreens employment letter needed to be dated. Applicant resubmitted his application that same date, and the County on September 24, 2021 again returned the application for failure to provide requested documents. Applicant resubmitted his application on September 24, 2021. Per the review log, the County approved the application on September 27, 2021.

In the Declaration of Crisis section of the form, Applicant wrote “**Loss of hours at work due to Covid 19.**” [Emphasis added]

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

Loss of hours at work due to Covid 19

The supporting documents Applicant submitted with this application included a letter dated September 22, 2021, purporting to be from Walgreens, and nine Earnings Statements. The letter is worded slightly differently than the Walgreens letter Applicant submitted with his first application, but also stated that Applicant’s employment hours had been reduced due to Covid-19. The letter was allegedly signed by Jennifer Perez in the Human Resource Department:



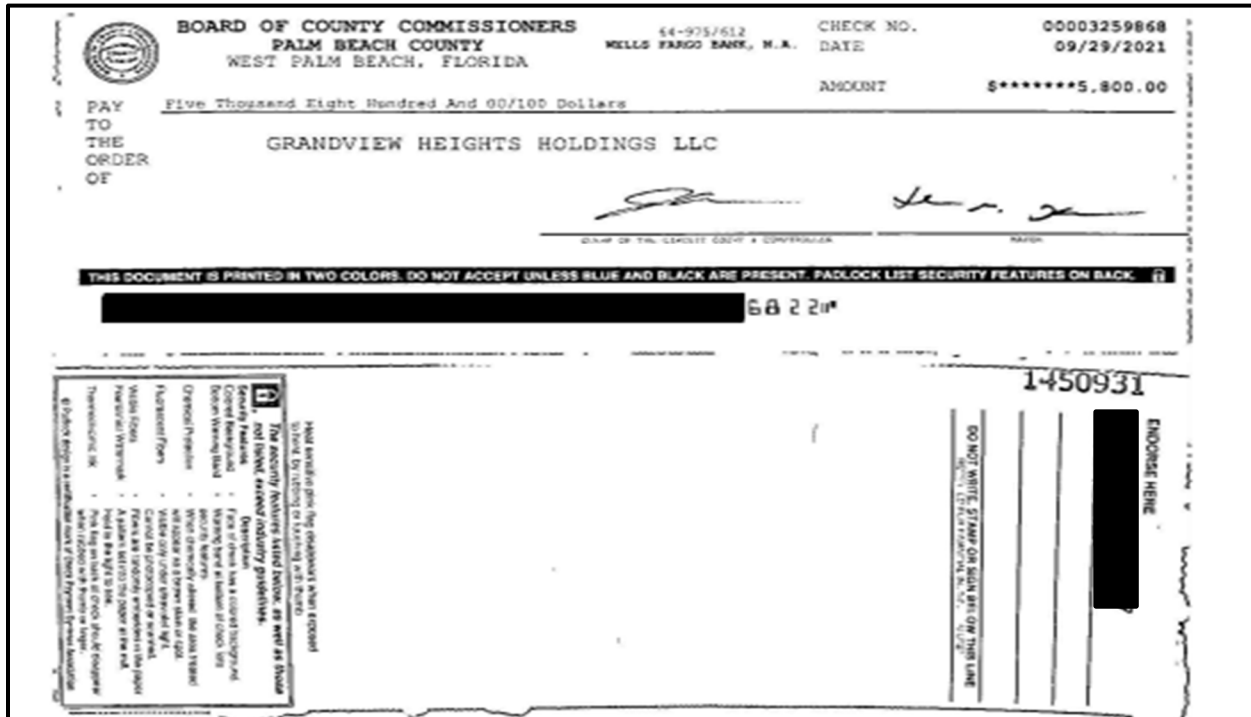
One of the nine paystubs Applicant submitted with this application, dated January 13, 2020, was also submitted with his first application. The other eight Earnings Statements represented pay reporting periods between January 13, 2020 and September 13, 2021. They shared the same format as the Earnings Statements submitted with the first application, and contained the same misspelling of Jupiter as “Jupitor”. Additionally, the overtime pay was not calculated correctly on several of the Earnings Statements.

WALGREENS DISTRIBUTION CENTER (561) 493-7900 15998 WALGREENS DR JUPITOR, FL 33478				EARNINGS STATEMENT		
EMPLOYEE NAME/ ADDRESS		EMPLOYEE NO.	REPORTING PERIOD	PAY DATE		
[REDACTED] LAKE PARK, FL 33403		855	08/31/2021 - 09/13/2021	09/13/2021		
INCOME	RATE	HOURS	CURRENT PAY	DEDUCTION	TOTAL	YTD TOTAL
REGULAR	\$18.50	55.50	\$1,026.75	STATUTORY DEDUCTIONS		
				FICA Medicare	14.89	258.46
				FICA Social Security	63.65	1,105.13
				Federal Tax	115.61	1,994.57
				State Tax	0.00	0.00
YTD GROSS	YTD DEDUCTION		YTD NET PAY	TOTAL	DEDUCTION	NET PAY
\$17,824.75	\$3,358.16		\$14,466.59	\$1,026.75	\$194.16	\$832.59

Applicant certified that these Earnings Statements and all other documents he provided were accurate when he electronically signed and submitted his application.

Payment to Grandview Heights Holdings LLC

On September 29, 2021, the County issued check number 00003259868, in the amount of \$5,800.00, to Grandview Heights Holdings LLC for Applicant’s rent assistance.



Applicant’s Third Rental Assistance Application

County records show Applicant electronically signed and submitted rental assistance application number 125948 on March 24, 2022. Applicant listed his address as Applicant

Address, and his monthly rent payment as \$1,450.00. He requested assistance for April 2022 through July 2022. On March 28, 2022, Community Services returned the application to Applicant, along with an email stating that his application was being returned because he had received rental assistance from both the State of Florida and County in October and November 2021. The email further stated that Applicant had 15 days to update his application³ and resubmit it or it would be “automatically closed due to non-response.” On April 12, 2022, Applicant’s third application was marked as non-responsive.

In the Declaration of Crisis Section of this application, Applicant stated “During the Covid my job reduced our hours, and the last month I also caught Covid and was out of work for two weeks. And that put me further behind.”

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

During the Covid my job reduced our hours, and the last month I also caught Covid and was out of work for two weeks. And that put me further behind

The supporting documents Applicant submitted with this application included a copy of Covid-19 test results and three paystubs. The paystubs represented three pay periods between January 31, 2022 and March 13, 2022 and shared the same format as the paystubs submitted with Applicant’s first two applications. This time, on all three paystubs “Jupiter” was spelled correctly.

WALGREENS DISTRUBUTION CENTER (561) 495-7800 15998 WALGREENS DR JUPITER, FL 33478				EARNINGS STATEMENT		
EMPLOYEE NAME/ ADDRESS		EMPLOYEE NO.	REPORTING PERIOD	PAY DATE		
[REDACTED] LAKE PARK, FL 33403		855	02/14/2022 - 02/27/2022	03/04/2022		
INCOME	RATE	HOURS	CURRENT PAY	DEDUCTION	TOTAL	YTD TOTAL
REGULAR	\$18.50	48.00	\$888.00	STATUTORY DEDUCTIONS		
				FICA Medicare	12.88	75.65
				FICA Social Security	55.06	323.46
				Federal Tax	38.99	287.79
				State Tax	0.00	0.00
YTD GROSS	YTD DEDUCTION	YTD NET PAY	TOTAL	DEDUCTION	NET PAY	
\$5,217.00	\$686.90	\$4,530.10	\$888.00	\$106.93	\$781.07	

Applicant certified that these paystubs and all other documents he provided were accurate when he electronically signed and submitted his application.

³ Community Services told the OIG that they discovered Applicant received a total of \$4,350.00 in rental assistance from the State of Florida for October, November, and December of 2021. The Community Services OSCARSS system is automatically linked to the State of Florida rental assistance system.

OIG Interview of Tonya White, Walgreens Human Resources Manager

In her capacity as the Human Resources Manager for the Palm Beach County, Florida Walgreens Distribution Center, Ms. White has access to all systems that identify Walgreens Palm Beach County Human Resources information and Walgreens Palm Beach County Distribution Center employees. Ms. White told the OIG that Applicant has been employed by Walgreens for almost three years.

Ms. White was shown the letter purportedly signed by Jennifer Perez dated September 22, 2021, and the Earnings Statements for reporting periods June 2 – June 15, 2020, and May 4 – May 17, 2021, and confirmed that they were “fraudulent.” She stated the Walgreens did not lay off any employees nor reduce hours as a result of COVID-19. Ms. White further said the company does not have an employee named Jennifer Perez, and that the format of the paystubs Applicant submitted to the County does not accurately reflect the company’s actual paystubs.

OIG Interview of Lamont Bailey, Walgreens Human Resources Generalist

The OIG subsequently contacted Walgreens Human Resources Generalist Lamont Bailey, who confirmed that all the paystubs and letters Applicant submitted with his three rental assistance applications “were not generated or issued by Walgreens.”

OIG Interview of Applicant

The OIG contacted Applicant, and he agreed to be interviewed on June 8, 2022. However, he did not appear for that interview. The OIG subsequently attempted to contact Applicant on multiple occasions to reschedule the interview, but he did not respond.

Conclusion

Applicant submitted three applications for rental assistance. On each occasion, he attested that he provided accurate information to the County. **Based upon our review of the documents and the statement of Applicant’s employer, we found that the paystubs and employment letters Applicant submitted to the County in support of his applications were fabricated.**

As a result of the false information Applicant provided in his first two applications, the County issued checks for \$7,400.00 and \$5,800.00, respectively, to Applicant’s landlord for his rent. We find the total amount of rental assistance issued of **\$13,200.00** to be Identified Costs. We also find that Applicant attempted to collect County funds based on his submission of false documents with a subsequent application, which was closed as non-responsive with no rental assistance issued.

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

IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

Identified Costs: \$13,200.00

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 \$13,200.00 of inappropriately issued funds.

RESPONSE FROM MANAGEMENT

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

The County concurs with the IG recommendation included in Investigative Report 2022-0007. The Community Services Department will seek reimbursement of the \$13,200.00 issued to the subject named in this investigation.

RESPONSE FROM APPLICANT

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, the Applicant was provided the opportunity to submit a written explanation or rebuttal to the finding as stated in this Investigative Report within ten (10) calendar days. The Applicant did not submit a response to this report.

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