

Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



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2021-0006

Biggy Productions -CARES Act Restart Grant False Statement and Inappropriate Expenditures September 8, 2022



John A. Carey Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

INVESTIGATIVE REPORT 2021-0006

DATE ISSUED: SEPTEMBER 8, 2022



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BIGGY PRODUCTIONS- CARES ACT GRANT FALSE STATEMENT AND INAPPROPRIATE EXPENDITURES

SUMMARY

WHAT WE DID

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

The OIG identified 32 Restart Grant applications for further review. One of those Restart Grant applications was submitted by Alner Auguste, owner of Biggy Productions, LLC (Biggy Productions).

The OIG's initial review revealed that prior to Mr. Auguste applying for Biggy Productions' Restart Grant, the U.S. Small Business Administration (SBA) approved Biggy Productions for a Paycheck Protection Program (PPP) forgivable loan.

Biggy Productions provided the OIG financial records showing how the business spent the Restart Grant funds

received. The OIG reviewed the records to determine whether funds were used to pay unauthorized expenses under Restart Grant Program guidelines.

Based on our review, the OIG initiated an investigation of the following allegations:

Allegation (1): Biggy Productions submitted a Restart Grant application containing a false statement, resulting in improper grant funding from a County program funded by the CARES Act.

Allegation: (2): Biggy Productions used Restart Grant funds contrary to program guidelines.

Our office reviewed Biggy Productions' Restart Grant application; its SBA PPP loan records; the funding agencies' program eligibility guidelines; and the Biggy Productions' financial records. We also interviewed Mr. Auguste and his wife, Marie Belony.

WHAT WE FOUND

Allegation (1) is supported.

On May 16, 2020, SBA approved Biggy Productions for a \$10,000.00 PPP forgivable loan through WebBank. Biggy Productions received that funding on May 18, 2020. Mr. Auguste submitted a Restart behalf application on Grant Biggy Productions on June 10, 2020. Mr. Auguste did not report the PPP funding on Productions' Restart Biggy Grant application as required, and the County awarded Biggy Productions a Restart Grant of \$19,368.00. Had Mr. Auguste reported the PPP funding as required, Biggy Productions' Restart Grant would have been reduced by \$10,000.00, the amount of the PPP loan.

Biggy Productions' receipt of Restart Grant funds *in excess* of the amount for which it was eligible resulted in Identified Costs¹ of \$10,000.

Allegation (2) is not supported.

The OIG review of Biggy Productions' financial statements showed that the company had not exhausted the Restart Grant funds as of the end of our review period. Biggy Productions had sufficient assets from non-County sources to pay its expenses that did not qualify under the Restart Grant guidelines; thus, we cannot determine that Biggy Productions had used \$9,368.00 of the Restart Grant funds

for improper purposes as of March 31, 2021. Since there is no expiration date on the expenditure of Restart Grant funds, Biggy Productions may use \$9,368.00 funds for eligible expenses in the future.

With respect to allegation 1, we found sufficient information to warrant referring our finding that Biggy Productions' Restart Grant application contained false statements to local law enforcement (with copy to the State Attorney's Office) for a determination of whether the facts arise to criminal acts under section 817.03, Florida Statutes.

We also found sufficient information to warrant referral of our finding to the United States Attorney's Office for a determination of whether the Biggy Productions application constitutes 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 \$10,000.00 in improperly issued funds.

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

BACKGROUND

The CARES Act

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

On March 27, 2020, the President signed the CARES Act into law. The CARES Act allocated \$2.2 trillion in economic relief to individuals, businesses, and governments affected by COVID-19. State governments were allocated a total of \$139 billion based on their populations (as measured by the U.S. Census Bureau in 2019), with no state



receiving less than \$1.25 billion. Florida received a total of \$8.328 billion, with \$261,174,832 of that total provided to Palm Beach County.

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

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

Eligible businesses included:

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

Eligible uses of Restart Business Grant Program funds included:

• Salaries/Payroll;

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

Restart Grant Applications

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

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

The maximum grant was \$25,000 for the first two of the three application periods. The maximum grant was \$15,000 for the third period. Before accessing, completing, and submitting the grant application, users were required to register with the Restart Grant portal by creating a user name and password and answering a ten-question Eligibility Questionnaire. If the applicant's answers to the questionnaire indicated that the applicant met the eligibility requirements, the applicant would then fill out an 18 question application.

The application asked for information including the business' name, address, type, and number of employees. The application also asked for the name, title, and percentage of ownership for each person with an ownership interest in the business.

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

Included among those certifications was the following:

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

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

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

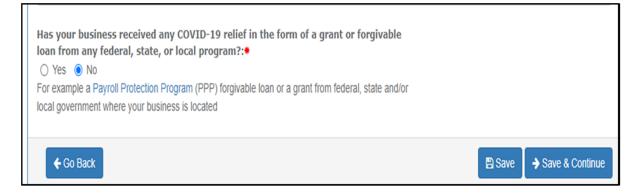
First reviewers also calculated the grant amount for eligible applicants. The amount of revenue listed in the tax return provided with applications was the primary factor in determining the need for the requested grant amount.

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

Question 17 of the County Restart Business Grant Application

There were 18 questions in the General Information section of the online application. Question 17 asked the following:

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



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

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

Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program?:*	Enter Amount:*
 If "YES", please provide documentation (such as executed Promissory Notes, Grant Agreements 6 If "YES", any amounts your business received will be deducted from any potential award your business Program 	
← Go Back	🖺 Save 🖌 Save & Continue

SBA PPP Forgivable Loans

The SBA PPP is a \$953 billion business loan program established by the United States federal government in 2020 through the CARES Act to provide forgivable emergency loans help to help certain businesses, self-employed workers, sole proprietors, certain nonprofit organizations, and tribal businesses continue to keep and rehire employees. As a result, if the business spends



the PPP loan on eligible expenses, such as payroll, rent, mortgage interest, personal

protective equipment, or utilities, and the business timely applies for loan forgiveness, the United States government will forgive the loan.

Biggy Productions LLC

Biggy Production's Articles of Organization were filed with the Florida Secretary of State Division of Corporations on March 19, 2013, with Alner Auguste as the registered agent. He signed the Articles as "member or an authorized representative of a member." The Annual Reports for Biggy Productions filed in 2014 and 2015 list Marie Belony as the manager, and were electronically signed by her. The business was administratively dissolved in September 2016 for failure to file an Annual Report. It was reinstated upon filing an Annual Report on September 14, 2017, with Mr. Auguste as manager and the signatory of the filing.

Biggy Productions was again administratively dissolved in September 2018, and reinstated on September 17, 2019, with Mr. Auguste listed as manager and signing the Annual Report as "CEO." After being administratively dissolved again on September 25, 2020, it was reinstated on October 20, 2021, with Mr. Auguste as the listed manager and signing the Annual Report as "Owner." The Annual Report filed in April 2022 lists Mr. Auguste as manager and is signed by him as "President."

Sunbiz corporate records show that at the time of Biggy Productions' Restart Grant application in May and June of 2020, Mr. Auguste was the registered agent and manager, and CEO.

ALLEGATIONS AND FINDINGS

Allegation (1):

Biggy Productions submitted a Restart Grant application containing a false statement, resulting in improper grant funding from a County program funded by the CARES Act.

Governing Directives:

Palm Beach County CARES for Business Restart Business Grant application guidelines

Finding:

The information obtained supports the allegation.

The OIG reviewed Biggy Productions' Restart Grant applications and supporting documents, its financial records, and open-source PPP loan information.

Biggy Productions' SBA PPP Forgivable Loan

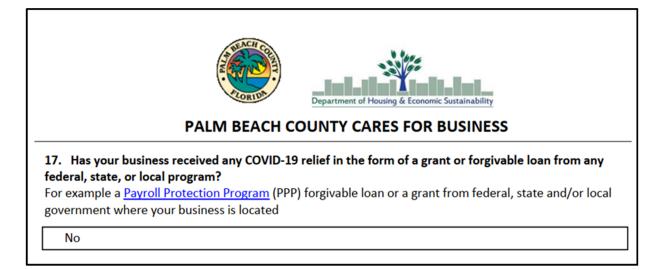
The OIG reviewed public records showing that on May 16, 2020, the SBA approved a \$10,000 PPP loan to Biggy Productions.

The OIG's review of Biggy Productions' financial records showed that on May 18, 2020, the PPP loan proceeds were direct deposited into Biggy Productions' business checking account. Mr. Auguste is the only authorized signatory on the account, and statements were sent to his home address.

1040101	history				
	Check		Deposita/	Withdrawels/	Ending d
Date	Number	Description	Credita	Debits	bela
5/5		Deposit Made In A Branch/Store	40.00		33
5/18		WT Fed#01526 Zons Bancorporati /Org=Webbank Corp Srt# 2020051800004133 Trn#200518094860 Rfb# G3B00001Arhtyeaj	10,000.00		
5/18		Wire Trans Svc Charge - Sequence: 200518094860 Srl# 2020051800004133 Trn#200518094860 Rfb# G3B00001Arhiyea		15.00	10,018
5/27	10300	11		130.00	9,888
5/28	10299	Check		184.38	9,704
5/29		Monthly Service Fee		14.00	9,690
Ending ba	ance on 5/31				9,690.

Biggy Productions' Restart Business Grant Application

On May 27, 2020, Mr. Auguste submitted a Restart Grant application on behalf of Biggy Productions and listed himself as 100 percent owner of the business. Mr. Auguste responded "No" to Question 17 on the application, "Has your business received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program? For example a Payroll Protection Program (PPP) forgivable loan..."



Mr. Auguste acknowledged and electronically signed the Restart Business Grant application, Number 3655.

On June 10, 2020, the County Department of Housing and Economic Development (DHED)'s first reviewer returned the application to Biggy Productions at the email address at: biggyproduction@gmail, with instructions to "[p]lease sign and date tax return. Please remove your name on line 1 of the W-9 and replace it with the company name..."

On June 10, 2020, Mr. Auguste resubmitted the application with his electronic acknowledgments and signature. His answer to Question 17 remained "No." DHED issued the final approval for Biggy Productions' Restart Grant application on June 29, 2020.

Restart Business Grant Payment to Biggy Productions

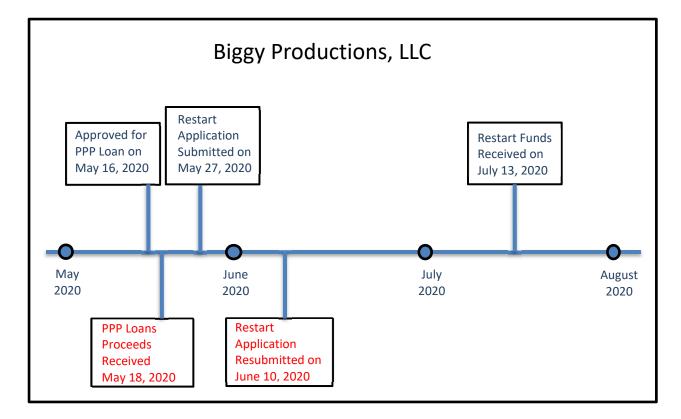
On July 6, 2020, the County issued check #00003192300 for \$19,368.00 to Biggy Productions.

1	AMOUNT	\$*****19.368.00
PAY Nineteen Thousand Three Nundred Sixty Eigh THE BIGGY PRODUCTIONS LLC ORDER OF	State of the state	مربع مربع
THIS DOCUMENT IS PRINTED IN TWO COLORS, DO NOT ACCEPT UNLESS	con i congun	SECURITY PEATURES ON BACK.

On July 13, 2020, this check was endorsed by Biggy Productions and deposited into Biggy Productions' business account.

nsaction	history				
	Check		Deposits/	Withdrawals/	Ending dail
Date	Number	Description	Credits	Debits	balanc
7/13		Edeposit IN Branch/Store 07/13/20 10:57:41 Am 9861	19,368.00		
		Okeechobee Blvd West Palm Beach FL 6265			
7/13		Tele-Transfer to xxxxx0492 Reference #TF08GytI8T		500.00	52,380.6
7/16		Purchase authorized on 07/15 Total Wine and Mor Village of We		58.84	52,321.8
		FL S300197790745275 Card 7379			
7/17	10210	Check		5,000.00	47,321.8
7/20		Recurring Payment authorized on 07/18 Tmobile*Auto Pay		270.07	47,051.7
		800-937-8997 WA S580200374989820 Card 7379			
7/24		Withdrawal Made In A Branch/Store		1,000.00	46,051.7
Ending ba	Ending balance on 7/31				46,051.7
Totals			\$19,368.00	\$6,828.91	

The OIG's review of the relevant facts established the following timeline:



OIG Interview of Marie Belony

Ms. Belony told the OIG that she is Mr. Auguste's wife, and that her role with Biggy Productions was to help him with the initial business start-up tasks, including incorporation. Ms. Belony said she filled out the Restart Grant application for Biggy Productions, but Mr. Auguste signed and submitted it.

OIG Interview of Alner Auguste

Mr. Auguste told the OIG he is the CEO of Biggy Productions. He said Ms. Belony is his wife and helps him with the business, but she is not an employee of the company. Mr. Auguste said that Ms. Belony filled out the Restart Grant application for Biggy Productions, but he signed and submitted it. Mr. Auguste stated he does not remember when he submitted the application, and thinks he completed it only once before it was approved. He said he may have received \$17,300 from the Restart Grant but was not sure. He also believed he received the grant money around May, 2020, before receiving PPP loan funds.

Mr. Auguste stated he answered "no" on Question # 17 of the Restart Grant application because he did not know the PPP money was in the account at the time that he submitted the application.

OIG Conclusion

Biggy Productions was approved for a \$10,000 PPP forgivable loan on May 16, 2020. The PPP loan proceeds were direct deposited into Biggy Productions' checking account on May 18, 2020.

Biggy Productions received this \$10,000 PPP loan approximately 23 days before Mr. Auguste resubmitted a Restart Business Grant application to the County attesting that the company had not received a PPP loan. Ms. Belony stated she physically completed the application on Biggy Productions' behalf and Mr. Auguste, the business' sole officer at the time, confirmed to the OIG that he signed and submitted it.

Question 17 specifically asked if the applicant business had received any COVID-19 relief in the form of a grant or forgivable loan from any federal, state, or local program, and specifically listed "Payroll Protection Program (PPP) forgivable loan" as an example of relief that needed to be disclosed. The applicant answered "No" to Question 17, both for the original Restart Grant submission on May 27, 2020, and for the final submission on June 10, 2020.

Mr. Auguste submitted a Restart Grant application with untrue and inaccurate statements. The fact that Biggy Productions had received PPP proceeds at the time that its Restart Business application was submitted rendered the company ineligible to receive a grant totaling \$19,368.00 from the County. If Mr. Auguste had answered that question truthfully, Biggy Productions' Restart Grant would have been reduced by the

\$10,000 it had already received in PPP funds. Information provided by Mr. Auguste on Biggy Productions' Restart Business Grant application was not true and accurate as he certified, and as required per the application. **As a result, Biggy Productions improperly received \$10,000.** The allegation is **supported**.

Allegation (2):

Biggy Productions used Restart Grant funds contrary to program guidelines.

Governing Directives:

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

Finding:

The information obtained **does not support** the allegation.

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

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

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

Among the 11 certifications, affirmations, and acknowledgements in the Restart Grant application, the applicant affirms that due to the public health emergency with respect to COVID-19, the grant is necessary to support the ongoing operations for the applicant business. Mr. Auguste submitted a Restart Grant application for his business Biggy Productions on May 27, 2020 and resubmitted it on June 10, 2020, checking the affirmations both times.

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

On July 6, 2020, the County issued check #00003192300 for \$19,368.00 to Biggy Productions. On July 13, 2020, this check was deposited into Biggy Productions' business account. Two months after receiving the check from the County, in September 2020, Mr. Auguste allowed Biggy Productions' registration with the Florida Division of

Corporations to administratively dissolve. The company was not reactivated with the Division of Corporations until October 2021.

Records Received From Biggy Productions

In response to the OIG's request for records of expenditures of the Restart Grant funds received by Biggy Productions, Ms. Belony provided Biggy Productions' invoices for advertising flyers, banners, and posters totaling \$5,758.50; production of a music video showing payment of \$8,500.00; audio production in the amount of \$400.00; and a performance agreement contract with a musical band for \$5,000.00. These expenditures were from May 1, 2020 through March 31, 2021 and totaled \$19,658.50.

OIG Interview of Alner Auguste

Mr. Auguste told the OIG that Biggy Productions dissolved on September 25, 2020 due to the COVID-19 pandemic and other financial issues, but the business was now again operating. He said he reactivated the entity through Sunbiz on October 20, 2021.

Mr. Auguste said Biggy Productions provided event hosting services and concerts within Palm Beach, Broward, and Miami Dade Counties, and that banners and flyers were part of the business' expenses. Mr. Auguste told the OIG that he applied for the Restart Grant because his business stopped when the pandemic happened, and that the business lost money because people were no longer attending its events due to the pandemic.

The OIG showed Mr. Auguste the documents that Ms. Belony provided to the OIG as records of Biggy Productions' Restart Grant fund expenditures. He confirmed the documents were an accurate reflection of how the money was spent

OIG Review of Biggy Productions Bank Records

The OIG reviewed the bank records of Biggy Productions, Alner Auguste, and Biggy Records, LLC, a separate entity for which Mr. Auguste is president. The \$19,368.00 Restart Grant check was deposited into Biggy Productions' business checking account on July 13, 2020. At the time of that deposit, the account had a balance of \$33,512.68.

The OIG examined Biggy Productions' bank records from the receipt of Restart Grant funding through March 31, 2021. During that time period, Biggy Productions had additional deposits of \$7,910. The account had \$36,968.99 in withdrawals during that time period.

The records showed a \$6,000.00 check to a videography company, Trillion Visuals, dated March 1, 2021 and posted to Biggy Productions' business checking account on March 15, 2021. Our review found that in the eight months³ subsequent to the Restart Grant deposit, there has been no substantiation of payments to other business-related

³ The OIG subpoenaed and reviewed bank records for the period from May 1, 2020 through March 31, 2021.

subcontractors of Biggy Productions, nor substantiation of other allowable expenses under the Restart Grant guidelines.

OIG Conclusion

On July 13, 2020, Biggy Productions received \$19,368.00 in Restart Grant funds. At the time of that deposit, Biggy Productions' bank account already had a balance of \$33,512.68. For the remainder of the OIG financial review period, Biggy Productions had additional deposits totaling \$7,910.00. In total, excluding the Restart Grant funding, Biggy Productions had \$41,422.68 in assets that were available for expenditure. The account had \$36,968.99 in withdrawals during that time period.

Mr. Auguste stated he used the grant funds to pay for advertising, audio and video production, and performance contracts, and provided invoices for those expenditures. Those expenditures do not fall within the allowable Restart Grant expenditures of; salaries/payroll, inventories, commercial lease, mortgage, or rent payments, utilities, or other expenses incurred due to new safety provisions.

However, during the OIG review period Biggy Productions had sufficient non-Restart Grant assets to pay for the entirety of its expenditures without using Restart Grant funds. Thus, we cannot determine that Biggy Productions had used the Restart Grant funds for improper purposes as of March 31, 2021. The Restart Grant Program guidelines do not contain a time frame for expenditure of the properly issued \$9,368.00 of Restart Grant funding. Therefore, while Biggy Productions has yet to incur allowable expenditures under program guidelines, the company may appropriately do so in the future.

The allegation is **not supported**.

IDENTIFIED COSTS

Identified Costs: \$10,000.00

ACKNOWLEDGEMENT

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

RECOMMENDED CORRECTIVE ACTIONS

1. The OIG recommends that the County seek reimbursement of \$10,000.00 of improperly issued funds.

RESPONSE FROM MANAGEMENT

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

The Department of Housing and Economic Development concurs with finding and recommendation included in the Draft Investigative Report for Case Number 2021-0006 regarding Biggy Productions.

Upon release from the OIG of the final report, the Department of Housing & Economic Development will begin the process of seeking reimbursement of the \$10,000 of improperly issued funds due to inaccurate statements by the business included in their application.

If you need any additional information, please contact us.

RESPONSE FROM BIGGY PRODUCTIONS

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Biggy Productions 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. Mr. Auguste's written response is as follows:

Regarding: Cares Act Grant Investigation Report Case Number 2021-0006

In regard to the allegations in the mentioned report. I would like to clarify that I did not willingly and knowingly provide false statement to obtain the grant funding. I wasn't aware of the SBA deposit that was made to the account prior to applying for the grant. I ask that you please take my statement into consideration. Under no circumstances I would have knowingly or willingly commit any of the allegations listed in the report.

Sincerely, Alner Auguste

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