



John A. Carey  
Inspector General

OFFICE OF INSPECTOR GENERAL  
PALM BEACH COUNTY



Inspector General  
Accredited

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*“Enhancing Public Trust in Government”*

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

# **Investigative Report**

## **2022-0008**

### **False Information on Palm Beach County Emergency Rental Assistance West Palm Beach Applications December 27, 2023**



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# OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

## INVESTIGATIVE REPORT 2022-0008

DATE ISSUED: DECEMBER 27, 2023



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### FALSE INFORMATION ON PALM BEACH COUNTY EMERGENCY RENTAL ASSISTANCE WEST PALM BEACH APPLICATIONS

#### SUMMARY

##### WHAT WE DID

The Palm Beach County (County) Community Services Department (Community Services) referred a matter to the Palm Beach County Office of Inspector General (OIG) concerning applications to the County Coronavirus Aid, Relief and Economic Security (CARES) Act – Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program and Emergency Rental Assistance Program (ERA Program).

Community Services alleged that [REDACTED] (Applicant 1), [REDACTED] (Applicant 2), and [REDACTED] (Applicant 3) submitted multiple assistance applications containing falsified information.

Based upon our initial review of the applications, supporting documents, and ERA Program guidelines, the OIG initiated an investigation of the following allegations:

**Allegation (1):** Applicant 1 provided the County false information in support of his rental assistance applications, which

resulted in improper grant funding from a County Program.

**Allegation (2):** Applicant 2 provided the County false information in support of her assistance applications, which resulted in improper grant funding from a County Program.

**Allegation (3):** Applicant 3 provided the County false information in support of his assistance applications, which resulted in improper grant funding from a County Program.

Our office reviewed Applicant 1, Applicant 2, and Applicant 3's assistance applications and supporting documents, publicly available information, and the program guidelines. We interviewed individuals with knowledge regarding the lease agreements and utility services at the addresses listed in the assistance applications, County and State of Florida officials, and attempted to interview Applicant 1, Applicant 2, and Applicant 3.<sup>1</sup>

##### WHAT WE FOUND

**Allegation (1) is supported.** We found that Applicant 1 submitted falsified

<sup>1</sup> Per publicly available information, Applicant 3 is Applicant 2's father. Applicant 3 died on August 8, 2022 and his obituary described him as a resident of Port St. Lucie, Florida.

information to the County in support of his rental assistance applications Nos. 42638, 65615, 72720, and 108272.

As a result, the County approved applications Nos. 42638, 65615, and 72720 and issued total payments of **\$19,600** on behalf of Applicant 1. The County denied application No. 108272. These inappropriate payments are Identified Costs.<sup>2</sup>

**Allegation (2) is supported.** We found that Applicant 2 submitted falsified information to the County in support of her rental assistance application No. 92742 and food assistance application No. 100924.

As a result, the County approved application 100924 and issued a payment of **\$400** to Applicant 2. The County did not process application No. 92742. This inappropriate payment is an Identified Cost.

**Allegation (3) is supported.** We found that Applicant 3 submitted falsified documents to the County in support of his rental assistance application No. 105177

and food assistance application No. 105107.

As a result, the County approved application No. 105107 and issued a payment of **\$400** to Applicant 3. This inappropriate payment is an Identified Cost.

We found sufficient information to warrant referring our findings to law enforcement, with notification 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 **\$20,000**<sup>3</sup> in improperly issued funds.

<sup>2</sup> 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.

<sup>3</sup> Because Applicant 3 is deceased, we do not make a recommendation regarding recovery of the \$400 in funds issued to him.

## BACKGROUND

### The CARES Act

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



On March 27, 2020, the President signed the CARES Act into law. The CARES Act allocated \$2.2 trillion in economic relief to individuals, businesses, and governments affected by COVID-19. State governments were allocated a total of \$139 billion based on their populations (as measured by the U.S. Census Bureau in 2019), with no state receiving less than \$1.25 billion. Florida received a total of \$8.328 billion, with \$261,174,832 of that total provided to Palm Beach County.

On May 15, 2020, the Palm Beach County Board of County Commissioners dedicated \$40 million of the approximately \$261 million allocated to it for "Emergency Mortgage, Rental and Utility Assistance." Community Services administrated the Rental Assistance portion of this funding.

### CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program Guidelines

The CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program was designed to utilize CARES Act funds to provide one-time rental and utility assistance to eligible County residents who experienced loss of income, reduction in hours, or unemployment as a direct result of the COVID-19 pandemic. The Community Services website explained that in order to be eligible for the program, the applicant must reside within the corporate limits of Palm Beach County and have documentable information to evidence loss of income, reduction in hours, or unemployment because of the COVID-19 pandemic, that contributed to missed rental payments and/or utility payments. Eligibility guidelines on the website also listed the income and asset requirements to qualify for the program. Assistance was provided for past due rent and/or utilities due from March 1, 2020 to December 31, 2020.

### Emergency Rental Assistance Program

On March 9, 2021, under the authority of the U.S. Department of Treasury Emergency Rental Assistance (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 17th, 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 online applications electronically on the Community Services Online System for Community Access to Resources and Social Services (OSCARSS). OSCARSS allowed applicants to upload certain supporting documentation, including identification and a rental lease agreement. A Balance Statement reflecting the amount of rent due was to be completed by the applicant's landlord or property manager. The Balance Statement could be uploaded by the landlord, property manager, or the applicant.



The form of the application differed slightly throughout the program, but each included eligibility questions and acknowledgements. Applicants were required to affirm these statements by electronically checking a box next to each one prior to submitting and resubmitting an application.

The Acknowledgement section for Applicant 1's rental assistance applications Nos. 42638, 65615, 72720, and 108272; Applicant 2's applications Nos. 92742 and 100924; and Applicant 3's applications Nos. 105107 and 105177, included the following:

- I further certify that I have read<sup>4</sup> 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]

<sup>4</sup> In the version of this acknowledgment for applications 42638 and 65615, there was a comma after the word "read." The rest of this acknowledgment has been identical for all applications.

The final page of the applications includes a space for the applicant's name.

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 eligibility requirements, 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.

Thereafter, 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.

### Addresses of Subjects

[REDACTED]

Applicant 1 listed his rental address as [REDACTED] West Palm Beach, Florida, 33401. Per the Palm Beach County Property Appraiser's online database, [REDACTED], Inc. has owned [REDACTED] since June 2017. [REDACTED], Inc.'s ownership of [REDACTED] encompasses ownership of [REDACTED].

The Florida Division of Corporations sunbiz.org records reflect that since May 2003, Luciano Tedesco has been the Registered Agent and one of the directors of [REDACTED], Inc.



We did not find any sunbiz.org records, official property records, or publicly available records connecting Applicant 3, Applicant 1, or Applicant 2 to [REDACTED], Inc. or reflecting that they had any ownership or management interest in [REDACTED].

[REDACTED]

Per Saint Lucie County, Florida Property Appraiser records, [REDACTED] is a single family residence purchased by Applicant 3 on December 11, 2020.



Publicly available records show that Applicant 3 died on August 8, 2022, and that this residence was his home at the time of his death.

Publicly available records also establish that Applicant 2 is the daughter of Applicant 3.

## ALLEGATIONS AND FINDINGS

### Allegation (1):

***Applicant 1 provided the County false information in support of his rental assistance applications, which resulted in improper grant funding from a County Program to Applicant 3.***

### Governing Directives:

Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program application and program guidelines; Palm Beach County Emergency Rental Assistance Program (ERA-1 and ERA-2) application and program guidelines.

### Finding:

The information obtained **supports** the allegation.

The following assistance applications were submitted on behalf of Applicant 1:

Applicant 1 Application Information							
Application Date	Application No.	Rental Address	Listed Landlord	Actual Landlord	Assistance Type	Status	Amount Funded
10/23/2020	42638	[REDACTED]	Applicant 3	[REDACTED]	Rental Assistance	Approved	\$4,800
1/22/2021	65615	[REDACTED]	Applicant 3	[REDACTED]	Rental Assistance	Approved	\$5,200
8/6/2021	72720	[REDACTED]	Applicant 3	[REDACTED]	Rental Assistance	Approved	\$9,600
12/6/2021	108272	[REDACTED]	Applicant 3	[REDACTED]	Rental Assistance	Denied	\$0
<b>Total Funded</b>							<b>\$19,600</b>

### **Applicant 1 Rental Address**

Applicant 1's address is listed as [REDACTED], West Palm Beach, FL 33401 in rental assistance applications Nos. 42638 and 65615. Applicant 1's address is listed as [REDACTED], West Palm Beach, FL 33401 (without a unit number) in applications No. 72720 and 108272. In each of the applications, Applicant 3 is listed as Applicant 1's landlord.

### **Applicant 1 Identification Information**

On each of these applications, Applicant 1 submitted the application and communicated with the County via email address [REDACTED]. The OIG determined through its review of various public and proprietary databases that this email address is directly linked to Applicant 1. Similarly, the telephone contact number listed on Applicant 1's applications is independently linked to him. Applicant 1's applications also contained his true social security account number.

### **Applicant 1 Economic Injury Disaster Loan**

The Small Business Administration OIG provided the Palm Beach County OIG with a copy of Rapid Finance Application #3314780584 submitted by Applicant 1 on September 29, 2020. The application showed the following information:

Legal Name: Applicant 1  
Company DBA: Applicant 1  
Entity Type: Sole-Proprietorship  
Business Full Address: [REDACTED] West palm beach fl 33401  
Business Email: [REDACTED]  
Business Phone: [REDACTED]  
Business Open Date: 3/15/2019

There were multiple similarities between this application and the rental assistance applications Applicant 1 submitted to Community Services. Both applications reflected the same date of birth, address, and email address for Applicant 1.<sup>5,6</sup>

<sup>5</sup> Applicant 1 is listed as having 100% ownership interest in a business in his September 29, 2020 Economic Injury Disaster Loan application. Under "Financial Info-Actual," Applicant 1 stated that the company's gross revenues for 2019 were \$88,000 and the cost of goods was \$6,500. The SBA issued a "Decline Letter" on October 2, 2020 because he did not meet the requirements for the loan.

<sup>6</sup> The OIG also examined publicly available information that revealed on February 10, 2021 (after Applicant 1 had received County funds for rental assistance applications Nos. 42638 and 6561, but prior to submitting application No. 72720), that the SBA approved a \$20,028 Payroll Protection Program (PPP) forgivable loan to Applicant 1 as a sole proprietorship. According to the loan information, Applicant 1 said that all but \$3 of this PPP funding was used to cover payroll expenses for his business. This loan was forgiven in April of 2022.



**Applicant 1 - Application 42638**

County records show application No. 42638 was electronically signed and submitted on behalf of Applicant 1 on October 23, 2020. The application listed Applicant 1's address as [REDACTED], West Palm Beach, FL., and listed the landlord as Applicant 3.

Vendor ID	Company Name	Alias / DBA Name	Address	Contact Name	Emails	Phone No	View
VC0000170859	[REDACTED]	[REDACTED]	[REDACTED] West Palm beach 33417	[REDACTED]	[REDACTED]	[REDACTED]	Info

What is the Rent Due Date? *	10/06/2020
What is your Landlord's Name?	[REDACTED]
What is your Landlord's Address?	[REDACTED]
What is your Landlord's Email Address?	[REDACTED]
What is your Landlord's Phone Number?	[REDACTED]
What is your Monthly Rent Amount? *	\$1,600.00

The application listed Applicant 1's monthly rent amount as \$1,600, sought \$5,100 in rental assistance for August to October 2020 including late charges, and stated the reason for his crisis situation as, "Was working for Ocean detailing when the pandemic started I was let go and currently still unemployed."

Declaration of Crisis (Please Explain the reason for your Crisis Situation below): *
Was working for Ocean detailing when the pandemic started I was let go and currently still unemployed

**Lease Document Submitted with Application 42638**

Applicant 1 attached to the application a three page "Contract to Lease" on a Lehmann Realty Team form with the verbiage "**This is a not a Lease. A Lease should be signed before occupancy.**" [Emphasis added] The Contract to Lease listed the "Prospective Landlord" as Applicant 3 and "Prospective Tenant" as Applicant 1 and stated the parties "agree to execute a lease agreement" for the property located at [REDACTED] [REDACTED] West Palm Beach Florida 33401 no later than April 20, 2020. The Contract to Lease stated that the lease term was to be May 1, 2020 through April 30, 2021. The document showed the monthly rent would be \$1,600.

**LEHMANN REALTY TEAM**

**Contract to Lease**  
(This is not a Lease. A Lease should be signed before occupancy.)

1. Parties: \_\_\_\_\_ (Prospective "Landlord") and \_\_\_\_\_ (Prospective "Tenant") agree to execute a lease agreement ("Lease") no later than 4/30/2020 [date] for the property described below. The Lease will include the terms set forth in Paragraphs 3-12 of this Contract to Lease ("Contract") and other mutually agreeable terms.  Landlord  Tenant (Landlord if left blank) will prepare the Lease.

2. Deposit: With the intention of entering into a Lease with Landlord, Tenant has paid \$ 1000 ("Deposit") to Lehmann Realty (Upon Acceptance) [deposit holder]. Upon execution of a Lease by both parties, the parties authorize the deposit holder to transfer the Deposit according to Landlord's instructions, and Landlord will credit the Deposit to the money due under Paragraph 5 below.

3. Property Address: \_\_\_\_\_ West Palm Beach, FL 33401

The property will be  unfurnished  furnished (attach inventory).  
The property will be used for only residential purposes and occupied by only Tenant and the following persons:

4. Lease Term: The lease will begin on 5/1/2020 [date] and end on 4/30/2021 [date].

Paragraph 16 of the Contract to Lease showed the "Prospective Tenant's Agent's Name" as Samuel Barber III of Lehmann Realty Inc. and the "Prospective Landlord's Agent's Name" as Applicant 3. Samuel Barber III holds a real estate broker license with the department of business and professional regulation.


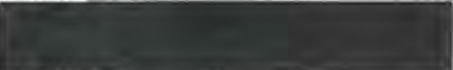
16. Brokers: The following real estate licensees ("Brokers") are the only Brokers involved in the procurement of this Contract to Lease:

Prospective Tenant's Agent's Name: Samuel Barber III  
 Prospective Tenant's Brokerage Name: Lehmann Realty Inc

Prospective Landlord's Agent's Name: \_\_\_\_\_  
 Prospective Landlord's Brokerage Name: \_\_\_\_\_



Each page of the Contract to Lease was initialed in the Prospective Tenant and Landlord sections. The final page showed what appears to be a handwritten signature "\_\_\_\_\_" as the Prospective Tenant and a signature for the Prospective Landlord.<sup>7</sup>

<sup>7</sup> The signature of Prospective Landlord is visible but unclear, but appears to read, "Applicant 3."

	<u>Apr 18, 2020</u>
Prospective Tenant	Date
Prospective Tenant	Date
Prospective Tenant's Address: _____	
Telephone and Email: _____	
	_____
Prospective Landlord	Date
Prospective Landlord	Date

**Balance Statement Submitted with Application 42638**

The Balance Statement submitted with this application showed past due rent of \$1,600 per month from August through October 2020, including a late fee of \$150 per month, for a total amount owed of \$5,200.<sup>8</sup> The document listed Applicant 3 as the landlord, purported to include a signature for Applicant 3,<sup>9</sup> and was dated October 22, 2020.

<b>Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ <u>\$5200</u></b>		
<b>Monthly arrear:</b>		
<b>Example: Month</b>	<u>April 2011</u>	<b>\$ <u>1000</u></b>
		<b>Late Charges <u>\$50</u></b>
<b>Month</b>	<u>August 2020</u>	<b>\$ <u>\$1600</u></b>
		<b>Late Charges <u>\$150</u></b>
<b>Month</b>	<u>September 2020</u>	<b>\$ <u>\$1600</u></b>
		<b>Late Charges <u>\$150</u></b>
<b>Month</b>	<u>October 2020</u>	<b>\$ <u>\$1600</u></b>
		<b>Late Charges <u>\$150</u></b>
<b>Month</b>	_____	<b>\$ _____</b>
		<b>Late Charges _____</b>
<b>Month</b>	_____	<b>\$ _____</b>
		<b>Late Charges _____</b>
<b>Attorney Fees: \$</b>	_____	<b>Court Cost \$</b> _____
		<u>10/22/2020</u>
<b>Landlords Name (Print)</b>	<b>Signature</b>	<b>Date</b>

Prior to the approval of an application, the landlord/property manager is required to register with the County as a vendor to allow the County to make payments. The alleged landlord, Applicant 3, was registered with the County as a vendor. The vendor registration

<sup>8</sup> The Balance Statement appears to include a mathematical error, as  $(\$1,600+150) \times 3 = \$5,250$ .

<sup>9</sup> The signature of the Balance Statement is similar to the signature of the Prospective Landlord on the Contract to Lease.



and stated the reason for his crisis was "I Was working for Ocean detailing when the pandemic started I was let go and currently still unemployed." The same Contract to Lease submitted with application 42638 was submitted with this application.

What is the Rent Due Date? *	02/06/2021
What is your Landlord's Name? *	[REDACTED]
What is your Landlord's Address? *	[REDACTED]
What is your Landlord's Email Address? *	[REDACTED]
What is your Landlord's Phone Number? *	[REDACTED]
What is your Monthly Rent Amount? *	\$1,600.00

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

I Was working for ocean detailing when the pandemic started I was let go and currently still unemployed

The Balance Statement submitted with the application was dated "1/22.20"<sup>10</sup> and showed a total of \$5,250 in past-due rent, including late fees for November, December, and January. The document lists the landlord as Applicant 3. A signature purporting to be Applicant 3's signature appears on the document next to his typed-written name.

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ 5250

Monthly arrears:

Example: Month April 2011 \$ 1000 Late Charges \$50

Month NOVEMBER \$ 1800 Late Charges \$150

Month DECEMBER \$ 1800 Late Charges \$150

Month JANUARY \$ 1000 Late Charges \$150

Month \_\_\_\_\_ \$ \_\_\_\_\_ Late Charges \_\_\_\_\_

Month \_\_\_\_\_ \$ \_\_\_\_\_ Late Charges \_\_\_\_\_

Attorney Fees: \$ \_\_\_\_\_ Court Cost \$ \_\_\_\_\_

[REDACTED]

Landlord's Name (Print) \_\_\_\_\_ Signature \_\_\_\_\_ Date 01.22.20

On January 28, 2021, the County processed the application. The Community Services internal notes state, "Late fee not listed on lease. Rent (only) assistance for November,

<sup>10</sup> This citation of the date as "1/22.20" appears to be a typographical error and may be intended to reflect January 22, 2021.

December, January 2021 and February 2021 added. Exhausting remaining balance \$5,200.”<sup>11</sup>

On February 4, 2021, the County issued check number 00003226119, in the amount of \$5,200 for rental assistance payable to Applicant 3. The check was purportedly endorsed by Applicant 3, but again with handwriting that is dissimilar to the Contract to Lease and the Balance Statement.

BOARD OF COUNTY COMMISSIONERS  
PALM BEACH COUNTY  
WEST PALM BEACH, FLORIDA

64-275/412  
WELLS FARGO BANK, N.A.

CHECK NO. 00003226119  
DATE 02/04/2021

AMOUNT \$\*\*\*\*\*5,200.00

PAY TO THE ORDER OF [REDACTED]

Five Thousand Two Hundred And 00/100 Dollars

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

5749211758

1417135

DO NOT WRITE, STAMP OR SIGN BEYOND THIS LINE

BURN PROOFING

**Applicant 1 - Application 72720**

County records show assistance application No. 72720 was electronically signed and submitted on behalf of Applicant 1 on August 6, 2021. Applicant 1’s address is listed as [REDACTED] West Palm Beach, FL 33401, with no reference to a unit number, and his landlord is listed as Applicant 3. Applicant 1 explained in his Declaration of Crisis that he “Was laid off from my job when the coronavirus came in put us into lockdown.”

What is your Landlord's Name?	[REDACTED]
What is your Landlord's Address?	[REDACTED] west palm beach do 33417
What is your Landlord's Email Address?	[REDACTED]
What is your Landlord's Phone Number?	[REDACTED]
What is your Monthly Rent Amount?	\$1,600.00

<sup>11</sup> Community Services could not explain to the OIG why even though the application requested three months rent and the balance sheet requested the same three months rent, Community Services nevertheless paid \$5,200 instead of \$4,800.

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

Was laid off from my job when the coronavirus came in put us into lockdown

The County returned the application, requesting "Balance Statement from Landlord" and stating, "Please contact your landlord as we have not received the balance statement."

The application was resubmitted on August 10, 2021. Two Balance Statements dated August 10, 2021 were submitted less than one hour apart in support of the application. The first Balance Statement showed a total of \$5,250 in past due rent, including late fees for May through July of 2021. The document is purportedly signed by Applicant 3.

Total balance (Rent + Late Fees + Court Cost) owed by the tenant: \$ \$5,250.00

Monthly arrears:

Example: Month April 2011 \$ 1000 Late Charges \$50

Month MAY 2021 \$ \$1600 Late Charges \$150.00


Month JUNE 2021 \$ \$1600 Late Charges \$150.00

Month JULY 2021 \$ \$1600 Late Charges \$150.00

Month \_\_\_\_\_ \$ \_\_\_\_\_ Late Charges \_\_\_\_\_

Month \_\_\_\_\_ \$ \_\_\_\_\_ Late Charges \_\_\_\_\_

Attorney Fees: \$ \_\_\_\_\_ Court Cost \$ \_\_\_\_\_


 08-10-2021

Landlords Name (Print) Signature Date

The second Balance Statement showed a requested rental amount totaling \$10,200, for May 2021 to October 2021, including late fees for May through August 2021. This included a request for future rental payments for September and October 2021. The document was dated August 10, 2021 and contained a notation that it was electronically signed by Applicant 3.

	Month	Rent Due	Late Fee	Legal Fee	Total Due
<b>Month 1</b>	May 2021	\$1,600.00	\$150.00	\$0.00	\$1,750.00
<b>Month 2</b>	June 2021	\$1,600.00	\$150.00	\$0.00	\$1,750.00
<b>Month 3</b>	July 2021	\$1,600.00	\$150.00	\$0.00	\$1,750.00
<b>Month 4</b>	August 2021	\$1,600.00	\$150.00	\$0.00	\$1,750.00
<b>Month 5</b>	September 2021	\$1,600.00	\$0.00	\$0.00	\$1,600.00
<b>Month 6</b>	October 2021	\$1,600.00	\$0.00	\$0.00	\$1,600.00
<b>Grand Total:</b>					<b>\$10,200.00</b>

 <b>Electronically Signed By</b>	08/10/2021 <b>Date</b>
--	---------------------------

The same Contract to Lease submitted with applications No. 42638 and 65615 was submitted with this application. The Contract to Lease referenced the tenant and landlord's agreement to execute a lease for the period from May 1, 2020 to April 30, 2021. The applicant did not submit any lease documents relating to the rental term addressed in Application No. 72720.


**Reemployment Assistance Document submitted with Application 72720**

Applicant 1 submitted a State of Florida Department of Economic Opportunity (DEO) document as proof of income with the application. The document showed Applicant 1's Claimant ID as 690236 and Claim Status as active.

Claimant Information					
Name:		Claimant ID: 690236	Claim ID: 2020-02		
Effective Date:	03/29/2020	Benefit Year End: 09/04/2021	Claim Status: Active		
Monetary Information					
Weekly Benefit Amount:	\$125	Balance:	\$1,625	Monetary Status:	Eligible Redetermined
Maximum Benefit Amount:	\$9,875	Earnings Disregard:	\$58.00	File Date:	02/05/2021
Requested Benefit Payment Information					
Last Week Signed:	6/27/2021 - 7/3/2021	Waiting Week:		Current Program Type: Pandemic - COVID 19	
Last Week Paid:	6/27/2021 - 7/3/2021	Service Language:	English		

On August 12, 2021, the County issued check number 00003252398 payable to Applicant 3 in the amount of \$9,600 for Applicant 1' rental assistance for May through October 2021, which excluded late fees. The check was purportedly endorsed by Applicant 3, again with handwriting that is dissimilar to the Lease and Balance Statement.




 <b>BOARD OF COUNTY COMMISSIONERS</b> <b>PALM BEACH COUNTY</b> <b>WEST PALM BEACH, FLORIDA</b>	64-575/A12 WELLS FARGO BANK, N.A.	CHECK NO. 00003252398 DATE 09/12/2021
	AMOUNT \$*****9,600.00	
PAY TO THE ORDER OF Nine Thousand Six Hundred And 00/100 Dollars	[Redacted]	
[Signature]		
THIS DOCUMENT IS PRINTED IN TWO COLORS DO NOT ACCEPT UNLESS BLUE AND BLACK ARE PRESENT. PADLOCK LIST SECURITY FEATURES ON BACK.		
[Redacted] 68220		
6543086510		
1433409		
DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE		

**Applicant 1 - Application 108272**

County records show that on August 6, 2021, assistance application No. 108272 was electronically signed and submitted on behalf of Applicant 1 stating that his monthly rental payment was \$1,600, and requesting a total of \$6,400 in rental assistance. The County returned the application to Applicant 1's listed email address, requesting that he "Please try and delete some of the social security cards on the application. I also need the payout sheet of unemployment form..." The application was resubmitted on December 8, 2021.

The application listed the same residential monthly rental payment amount and landlord information as in the previous applications. The application stated a Declaration of Crisis that "my place of employment was closed do [sic] to covid -19." A document similar to the Contract to Lease submitted with the other applications was submitted with the application. The Lehmann Realty Team form submitted in support of assistance application No. 108272 was titled "Lease", and reflected a term of May 1, 2021 to April 30, 2022. Applicant 3 is listed as the "Prospective Landlord" and Applicant 1 is listed as the "Prospective Tenant."



**Lease**

1. **Parties:** \_\_\_\_\_ (Prospective "Landlord")  
 and \_\_\_\_\_ (Prospective "Tenant")  
 agree to execute a lease agreement ("Lease") no later than 04/20/2021 [date] for the property described below. The Lease will include the terms set forth in Paragraphs 3-12 of this Contract to Lease ("Contract") and other mutually agreeable terms.  Landlord  Tenant (Landlord if left blank) will prepare the Lease.

2. **Deposit:** With the intention of entering into a Lease with Landlord, Tenant has paid \$ 1600 ("Deposit") to Lehmann Realty (Upon Acceptance) [deposit holder]. Upon execution of a Lease by both parties, the parties authorize the deposit holder to transfer the Deposit according to Landlord's instructions, and Landlord will credit the Deposit to the money due under Paragraph 5 below.

3. **Property Address:** \_\_\_\_\_ West Palm Beach, FL 33401

The property will be  unfurnished  furnished (attach inventory).  
 The property will be used for only residential purposes and occupied by only Tenant and the following persons:  
 \_\_\_\_\_

4. **Lease Term:** The lease will begin on 05/01/2021 [date] and end on 04/30/2022 [date].

The Prospective Tenant's Agent was listed as Samuel Barber, III and the Prospective Landlord's Agent's Name was listed as Luciano Tedesco on behalf of United Realty Group Inc.

16. **Brokers:** The following real estate licensees ("Brokers") are the only Brokers involved in the procurement of this Lease:

Prospective Tenant's Agent's Name: Samuel Barber III  
 Prospective Tenant's Brokerage Name: Lehmann Realty Inc

Prospective Landlord's Agent's Name: Luciano Tedesco  
 Prospective Landlord's Brokerage Name: United Realty Group Inc

A three-page Property Management Agreement executed on January 7, 2020 was submitted with this application showing Applicant 3 as "Owner" and \_\_\_\_\_ Inc. as "Agent." The Agreement indicated that Applicant 3 appointed \_\_\_\_\_ Inc. to exclusively manage \_\_\_\_\_ West Palm Beach, FL 33401 from January 7, 2020 through January 7, 2022.

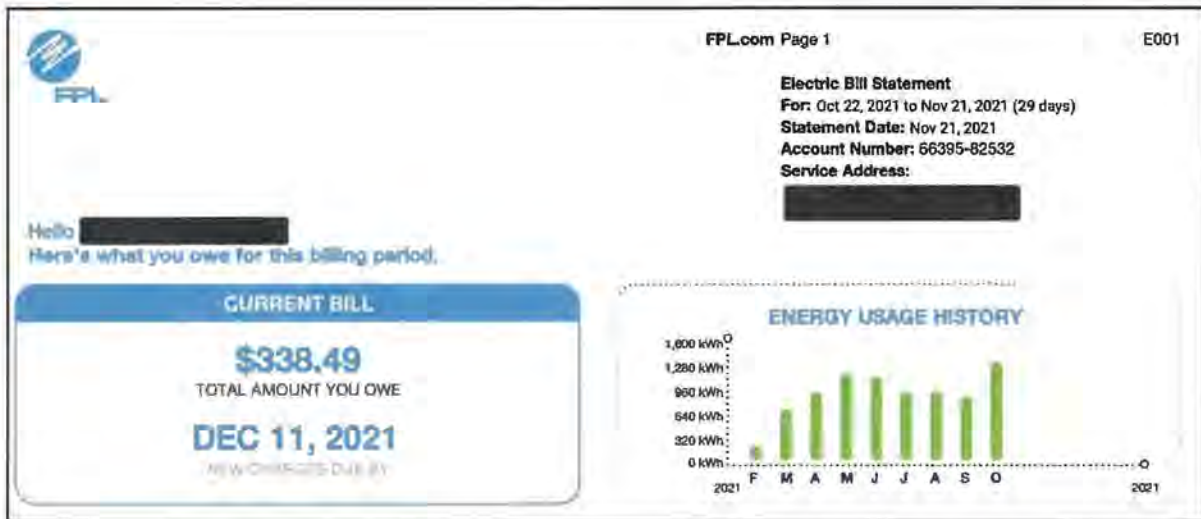
State of Florida	Rev. 13462F4
<b>PROPERTY MANAGEMENT AGREEMENT</b>	
This Property Management Agreement (this "Agreement") is made this 07 day of January, 2020, by and between [REDACTED] ("OWNER") and [REDACTED] ("AGENT"). The parties agree as follows:	
<b>1. Managing Agent.</b> Owner appoints Agent to exclusively manage the property located at [REDACTED] [REDACTED] West Palm Beach, FL 33401 (the "Premises"). Agent accepts the appointment and agrees to provide building management services. Owner agrees to pay all reasonable expenses in connection with those services. Agent agrees to use due diligence and act under reasonable care during the performance of this contract and in all matters involved with the management of this property.	
<b>2. Term.</b> The term of this Agreement will be from January 07, 2020 to January 07, 2022.	
<b>3. Agent's Responsibilities.</b> Owner grants Agent full authority to do any and all lawful things necessary for the fulfillment of this Agreement, including the following:	
i. To use diligence in managing the premises and to rent, lease, and operate the premises.	
ii. To collect all rents and other monies from Tenant as they become due. Agent does not guarantee tenant obligations. Agent may employ collection agencies, attorneys, or any other reasonable and lawful means to collect from a Tenant. Agent is responsible for suing and recovering, including settlement, for rent and for loss or damage to any part of the property. Agent is not responsible for mortgage payments, taxes, fire or other insurance premiums, or any recurring expenses.	

As proof of COVID Crisis and household income, documents from DEO were again submitted with the application. The documents showed Applicant 1' Claimant ID as 690236 and his Claim Status as active.

The County denied the application, citing "Invalid Documents. Other Reason: Altered and unverifiable documents."

#### **Proof of Residency – Florida Power and Light Statement Submitted with Application 108272**

As proof of Palm Beach County residency, the applicant submitted a Florida Power and Light Electric Bill Statement in Applicant 1's name for address [REDACTED], West Palm Beach, FL 33401.



The OIG contacted FPL to inquire about the information in the utility bill statement submitted with rental assistance application No. 108272. A representative from FPL advised the OIG that the account number on this statement, 66395-82532, was associated with an address for Applicant 2 from February 10, 2021 to September 23, 2022.

According to FPL, the actual address associated with account no. 66395-82532 did not match the address on Applicant 1's rental assistance application or the FPL statement submitted with that application.

#### **OIG Information from Luciano Tedesco, Registered Agent for [REDACTED], Inc.**

The OIG interviewed Luciano Tedesco, the individual identified as the Landlord's Agent's on the Lease submitted with Applicant 1's Application No. 108272 and identified as the the Registered Agent of [REDACTED], the owner of the rental property listed in Applicant 1's rental assistance applications. Mr. Tedesco confirmed to the OIG that [REDACTED], Inc. owned the property listed as Applicant 1's address on his rental assistance applications.

The OIG presented Mr. Tedesco with the Contracts to Lease, the Lease, and the Property Management Agreement submitted with Applicant 1's various rental assistance applications. Mr. Tedesco told the OIG, "I have never seen or signed these documents before. It is a fraud." He also stated that Applicant 3 leased the property as tenant from May 1, 2020 to April 30, 2021 at a rental rate of \$1,600 per month. He stated that Applicant 3 was never an owner or landlord for the property.

#### **OIG Interview of Sherri Miller of The Department of Economic Opportunity**

Benefits Program Supervisor Sherri Miller of the DEO performed a search of Applicant 1 in DEO's systems. She advised the OIG that her records conflicted with the DEO information provided to the County in support of Applicant 1's applications. Specifically,

she stated that the documents submitted with Applicant 1's applications were altered. She told the OIG that the DEO Claimant ID on the documents submitted to the County had been issued to Applicant 1, but she was unable to locate an open/active unemployment claim associated with Applicant 1 for the dates relevant to the applications. Ms. Miller also said that a Claimant ID number could not be used by multiple DEO benefit recipients.

### OIG Interview of Applicant 1

The OIG made multiple attempts to schedule an interview with Applicant 1. He did not respond to those attempts.

### OIG Interview of Applicant 3

The OIG made multiple attempts to schedule an interview with Applicant 3. He did not respond to those attempts.<sup>12</sup>

### Conclusion

Applicant 1 submitted rental assistance applications Nos. 42638, 65615, 72720, and 108272 to the County, each with an attestation that the information provided was accurate. Applicant 1 provided and interacted with the County using contact information and identifiers that were directly and independently attributable to him.

Applicant 3 was listed as Applicant 1's landlord in each of those applications. The Palm Beach County Property Appraisal records show that Applicant 3 was not the owner of the property listed in Applicant 1's applications at any time relevant to this investigation. According to the property owner's representative, Applicant 3 was, in fact, at the time listed in the rental applications, the lessee for [REDACTED] West Palm Beach, FL 33401. However, that representative told the OIG that **Applicant 3 was never the owner or landlord for that property.**

Thus, we find that the lease agreements, Balance Statements, and Property Management Agreement submitted with Applicant 1's assistance applications Nos. 42638, 65615, 72720, and 108272 were all fraudulent. Applicant 3 was not the authorized recipient of the rental payments for the assistance applications submitted in Applicant 1's name. Additionally, the DEO and FPL supporting documents submitted with the applications were fictitious.

As a result of applications submitted with fraudulent supporting documentation, the County issued payments totaling \$19,600.00 on behalf of Applicant 1 for applications 42638, 65615, and 72720. In addition, application 108272 was submitted to the County in an attempt to obtain an additional \$6,400.00 in rental assistance through false and inaccurate information.

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<sup>12</sup> Multiple attempts were made prior to Applicant 3's death.

The allegation is supported.<sup>13</sup>

**Allegation (2):**

***Applicant 2 provided the County false information in support of her assistance applications, which resulted in improper grant funding from a County Program.***



**Governing Directives:**

Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program application and program guidelines; Palm Beach County Emergency Rental Assistance Program (ERA-1 and ERA-2) application and program guidelines.


**Finding:**

The information obtained **supports** the allegation.

Applicant 2 submitted the following assistance applications:

Application Date	Application No	Rental Address	Listed Landlord	Actual Landlord	Assistance Type	Status	Amount Issued
9/23/2021	92742	 West Palm Beach, FL 33407	Applicant 3	Tallstone LLC	Rental Assistance	Non-responsive	\$0
11/10/2021	100924	 West Palm Beach, FL 33417	NA	NA	Grocery Card	Processed	\$400

**Applicant 2 - Application 92742**

County records show that on September 23, 2021, rental assistance application No. 92742 was electronically signed and submitted to the County on behalf of Applicant 2. The application lists Applicant 2’s address as , West Palm Beach, FL 33407, and listed the landlord as Applicant 3. Applicant 2 listed her monthly rental payment as \$1,600 and stated the reason for her crisis situation as, “the company I worked for closed do (sic) to covid 19.”<sup>14</sup>

<sup>13</sup> There are significant discrepancies in the listed employment status of Applicant 1’s Economic Injury Disaster Loan and Payroll Protection Program Loan applications. The OIG will provide this Report to agencies responsible for management of those programs and to the law enforcement agencies that oversee those programs.


<sup>14</sup> Our investigation discovered Applicant 2’s submission of Economic Injury Disaster Loan and Payroll Protection Program Loan applications. These applications contained information that potentially contradicted Applicant 2’s claims

What is your Landlord's Name? *	[REDACTED]
What is your Landlord's Address? *	[REDACTED]
What is your Landlord's Email Address? *	[REDACTED]
What is your Landlord's Phone Number? *	[REDACTED]
What is your Monthly Rent Amount? *	\$1,600.00

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

the company | worked for closed do to covid 19

The County returned the application on several occasions, noting that the corresponding lease needed to be uploaded. On September 27, 2021, Applicant 2 resubmitted the application for the final time, along with a three page document on a Lehman Realty Team form listing the "Prospective Landlord" as Applicant 3 and "Prospective Tenant" as Applicant 2. The document did not list a rental property address, but showed the monthly rent as \$1,600. The lease term was May 1, 2021 to April 30, 2022. Although this document did not display "Lease" at the top of the first page, Applicant 2 submitted it as the lease agreement in support of her application for rental assistance. The form was almost identical to the Lehman Realty Team forms titled "Contract to Lease" and "Lease" submitted with Applicant 1's applications.



**1. Parties:** \_\_\_\_\_ (Prospective "Landlord")  
 and \_\_\_\_\_ (Prospective "Tenant")  
 agree to execute a lease agreement ("Lease") no later than 4/20/2021 [date] for the property described below. The Lease will include the terms set forth in Paragraphs 3-12 of this Contract to Lease ("Contract") and other mutually agreeable terms.  Landlord  Tenant (Landlord if left blank) will prepare the Lease.

**2. Deposit:** With the intention of entering into a Lease with Landlord, Tenant has paid \$ 1600 ("Deposit") to Lehmann Realty(Upon Acceptance) [deposit holder]. Upon execution of a Lease by both parties, the parties authorize the deposit holder to transfer the Deposit according to Landlord's instructions, and Landlord will credit the Deposit to the money due under Paragraph 5 below.

**3. Property Address:** \_\_\_\_\_

The property will be  unfurnished  furnished (attach inventory).  
 The property will be used for only residential purposes and occupied by only Tenant and the following persons:  
 \_\_\_\_\_

**4. Lease Term:** The lease will begin on 5/01/2021 [date] and end on 4/30/2022 [date].

of unemployment. The OIG will provide this Report to agencies responsible for management of these programs and to the law enforcement agencies that oversee these programs.

Paragraph 16 of the document showed the "Prospective Tenant's Agent's Name" as Samuel Barber III of Lehmann Realty Inc. and the "Prospective Landlord's Agent's Name" as Luciano Tedesco of United Realty Group Inc.

**16. Brokers:** The following real estate licensees ("Brokers") are the only Brokers involved in the procurement of this Contract to Lease:

Prospective Tenant's Agent's Name: Samuel Barber III  
Prospective Tenant's Brokerage Name: Lehmann Realty Inc

Prospective Landlord's Agent's Name: Luciano Tedesco  
Prospective Landlord's Brokerage Name: United Realty Group Inc

The final page showed signatures in the Prospective Tenant's and Landlord's sections.

[Redacted Signature] 5/01/2021  
Prospective Tenant Date

Prospective Tenant's Address: \_\_\_\_\_  
Telephone and Email: \_\_\_\_\_

[Redacted Signature] 5/01/2021  
Prospective Landlord Date

\_\_\_\_\_  
Prospective Landlord Date

Prospective Landlord's Address: \_\_\_\_\_  
Telephone and Email: \_\_\_\_\_

**Re-employment Assistance Document Submitted with Application 92742**

Applicant 2 submitted a document from the DEO in support of her application. The document showed Applicant 2's Claimant ID as 690236 and Claim Status as active.

With the exception of the Claimant's name, the information on this document appears to be an exact match to the document submitted with Applicant 1 rental assistance application No. 72720. The Claimant ID also matched the Claimant ID on the document submitted with Applicant 1's application 108272.



Claimant Information				
Name:		Claimant ID: 690236	Claim ID: 2020-02	
Effective Date: 03/29/2020		Benefit Year End: 09/04/2021	Claim Status: Active	
Monetary Information				
Weekly Benefit Amount:	\$125	Balance:	\$1,625	Monetary Status: Eligible Redetermined
Maximum Benefit Amount:	\$9,875	<a href="#">Earnings Disregard</a> †	\$58.00	File Date: 02/05/2021
Requested Benefit Payment Information				
Last Week Signed:	6/27/2021 - 7/3/2021	Waiting Week:		Current Program Type: Pandemic - COVID 19
Last Week Paid:	6/27/2021 - 7/3/2021	Service Language:	English	
IMPORTANT ITEMS THAT NEED YOUR IMMEDIATE ATTENTION - CLICK ON LINK TO VIEW ITEMS				
<p>Messages - Notice of events, status changes, and other available actions</p> <ul style="list-style-type: none"> <li>You may apply for a Reemployment Assistance benefits claim. Select "Apply for Reemployment Assistance Benefits" to complete a new application.</li> </ul>				

On September 27, 2021, the County asked Applicant 2 to "Please explain your relationship between [REDACTED] and you because you both have the same last name. landlord is not the owner according to PAPA." Applicant 2 did not respond. Consequently, the application status became "non-responsive."

### Property Appraiser's Records for Rental Address

The OIG reviewed the Palm Beach County Property Appraiser's online database, and found that those records reflect that Tallstone LLC owned [REDACTED], West Palm Beach, FL during the time referenced in the applications.

Sunbiz records show Tallstone LLC's Articles of Organization were filed with the Florida Secretary of State Division of Corporations on October 26, 2016, with Marta E. Jacofsky signing the Articles as "member or an authorized representative." At the time of Applicant 2's applications in September and August of 2021, Jorge Kupferman was the Registered Agent for Tallstone LLC.

### Applicant 2 - Application 100924

County records show that on November 10, 2021, food assistance application No. 100924 was electronically signed and submitted to the County on behalf of Applicant 2. The application listed Applicant 2's residential address as [REDACTED] in West Palm Beach, Florida, and her mailing address as [REDACTED] West Palm Beach, FL 33417.<sup>15</sup> Applicant 2 reported the reason for her crisis situation as, "My place of employment closed do [sic] to covid 19."

<sup>15</sup> Each of Applicant 1' rental assistance applications list the address of the purported landlord, Applicant 3, [REDACTED] West Palm Beach, FL 33417 (Allegation No. 1). Applicant 3 [REDACTED] West Palm Beach, FL 33417, as his rental address in each of his assistance applications (Allegation No. 3).

Applicant 2 submitted the same document from the DEO with her application as she did with rental assistance application 92742.

### **Proof of Residency - FPL Statement Submitted with Application 100924**

As proof of County residency, Applicant 2 submitted an FPL Electric Bill Statement. The OIG contacted FPL to inquire about the information in the utility bill statement submitted with rental assistance application No. 100924. A representative from FPL advised the OIG that the account number on this statement, 66395-82532<sup>16</sup>, belonged to Applicant 2 from February 10, 2021 through September 23, 2022. However, information provided by FPL showed that the address for account No. 66395-82532 did not match the service address on the statement submitted with Applicant 2's application. FPL records indicated utility service at [REDACTED] West Palm Beach, Florida was registered in the name of a different account holder.

On November 17, 2021, the County processed the application and issued Applicant 2 a grocery card in the amount of \$400.

### **OIG Interview of Luciano Tedesco**

The OIG interviewed Luciano Tedesco, the individual identified as the Landlord's Agent on the Lease submitted with Applicant 2's rental assistance application No. 92742. Mr. Tedesco told OIG that he had never seen the document, did not sign it, and that it was "a fraud."

### **Information from Department of Economic Opportunity Benefits Program Supervisor Sherri Miller**

DEO Benefits Program Supervisor Sherri Miller noted that Applicant 2 and Applicant 1 submitted DEO documents to the County with the same Claimant ID. She advised the OIG that each claimant receives a different Claimant ID. Ms. Miller told the OIG that the Claimant ID had been issued to Mr. Applicant 1, not Applicant 2, and that the documentation had been altered to change the name of the claimant and the active status of the claim. The DEO could not locate a claim associated with Applicant 2 for the dates of DEO documents submitted to the County.

### **OIG Interview of Applicant 2**

The OIG spoke with Applicant 2. Applicant 2 confirmed that she submitted the two assistance applications to the County identified in this report, but stated she was currently out of town. Applicant 2 agreed to speak with OIG at a later date. The OIG subsequently attempted to contact Applicant 2 on multiple occasions to schedule an interview, but she did not respond.

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<sup>16</sup> The account number on this statement matched the account number listed on the FPL statement submitted with Applicant 1's application 108272.

## Conclusion

Applicant 2 admitted to the OIG that she submitted applications for assistance. On each, she attested that she provided accurate information to the County. Applicant 2 submitted application 92742 requesting \$9,600 in rental assistance payable to Applicant 3, who she claimed was her landlord. The County asked Applicant 2 to "explain your relationship between [REDACTED] and you because you both have the same last name. landlord is not the owner according to PAPA." Applicant 2 did not respond to the request.

According to the true property representative the lease that Applicant 2 submitted with her application was fraudulent.

According to a representative of DEO, the DEO documents Applicant 2 submitted with her rental application No. 92742 and grocery assistance application 100924 had been altered. In addition, FPL provided documentation to the OIG showing that the FPL statement submitted with grocery assistance application No. 100924 was fictitious.

Therefore, we find that Applicant 2 received \$400.00 in County food assistance received as a result of her submission of false and inaccurate information.

The allegation is **supported**.

### Allegation (3):

***Applicant 3 provided the County false information in support of his assistance applications, which resulted in improper grant funding from a County Program.***

### Governing Directives:

Palm Beach County CARES Act - Coronavirus Relief Fund Rental, Utilities, and Food Assistance Program application and program guidelines; Palm Beach County Emergency Rental Assistance Program (ERA-1 and ERA-2) application and program guidelines.

### Finding:

The information obtained **supports** the allegation.

Applicant 3 submitted the following assistance applications:

Application Date	App No.	Rental Address	Listed Landlord	Actual Landlord	Assistance Type	Status	Amount Issued
11/19/2021	105107	[REDACTED] West Palm Beach, FL 33417	N/A	N/A	Grocery	Processed	\$400
11/22/2021	105177	[REDACTED] West Palm Beach, FL 33417	Tennis Towers Apartments		Rental	Denied	\$0

**Assistance Application 105107**

County records showed food assistance application No. 105107 was electronically signed and submitted on behalf of Applicant 3 on November 19, 2021. The application lists Applicant 3’s address as [REDACTED], West Palm Beach, Florida. This address matched the mailing address Applicant 2 listed on her application number 100924. Applicant 3 reported the reason for his crisis as, “I was laided [sic] off from job do [sic] to covid 19.”

Applicant 3 submitted a document from the DEO as proof of income with his application. The document showed Applicant 3’s Claimant ID as 690236 and Claim Status as active.

Claimant Information					
Name: [REDACTED]	Claimant ID: 690236	Claim ID: 2020-02			
Effective Date: 03/29/2020	Benefit Year End: 09/04/2021	Claim Status: Active			
Monetary Information					
Weekly Benefit Amount:	\$125	Balance:	\$1,625	Monetary Status:	Eligible Redetermined
Maximum Benefit Amount:	\$9,875	Earnings Disregard*:	\$58.00	File Date:	02/05/2021
Requested Benefit Payment Information					
Last Week Signed:	6/27/2021 - 7/3/2021	Waiting Week:		Current Program Type:	Pandemic - COVID 19
Last Week Paid:	6/27/2021 - 7/3/2021	Service Language:	English		
IMPORTANT ITEMS THAT NEED YOUR IMMEDIATE ATTENTION - CLICK ON LINK TO VIEW ITEMS					
Messages - Notice of events, status changes, and other available actions					
<ul style="list-style-type: none"> <li>You may apply for a Reemployment Assistance benefits claim. Select "Apply for Reemployment Assistance Benefits" to complete a new application.</li> </ul>					

With the exception of the name, the information on this document is an exact match of the information on the document Applicant 1 submitted to the County in support of his application 72720 and the document Applicant 2 submitted in support of application 92742. Applicant 3, Applicant 2, and Applicant 1 all had the same Claimant IDs and status on the DEO documents each submitted.

As proof of County residency, Applicant 3 submitted an FPL Electric Bill Statement. According to information obtained from FPL, the account number on this statement, 66395-82532, belonged to account holder Applicant 2 from February 10, 2021 through September 23, 2022. The service address on this statement matched the address on Applicant 2's FPL account. Additionally, the account number on this statement matched the account number listed on the FPL statement submitted in Applicant 1's name with application 108272.

On November 22, 2021, the County processed the application and issued Applicant 3 a Grocery card in the amount of \$400.

### Assistance Application 105177

County records show on November 22, 2021, Applicant 3 initially electronically signed and submitted assistance application 105177. Applicant 3 listed his address as [REDACTED] WPB, FL. Applicant 3 listed his monthly rent amount as \$1,469 and advised the reason for his crisis situation as, "LAYED OFF DO [sic] TO THE COVID 19."

What is your Landlord's Name? *	TENNIS TOWERS APARTMENTS
What is your Landlord's Address? *	[REDACTED] West Palm Beach, FL 33417
What is your Landlord's Email Address? *	tennistowers@richpropertiesfl.com
What is your Landlord's Phone Number? *	561-471-0800
What is your Monthly Rent Amount? *	\$1,469.00
<b>Declaration of Crisis (Please Explain the reason for your Crisis Situation below):</b>	
LAYED OFF DO TO THE COVID 19	

As proof of COVID Crisis, Unemployment Benefit Claim, and household income, Applicant 3 submitted documents from the DEO. The documents showed Applicant 3's Claimant ID as 690236 and Claim Status as active. With the exception of the Claimant's name, these DEO documents were identical to the documents Applicant 1 submitted with application 108272. In addition, the Claimant ID matched the Claimant ID listed on Applicant 2's Reemployment Assistance documents.

As proof of County residency, Applicant 3 submitted the same FPL Electric Bill Statement with this application as he did with application 105107.

On December 1, 2021, the County asked Applicant 3 to provide "Proof of Income for Applicant 3: Copy of his Full Earnings Statements for the past 8 weeks." The following documents were submitted with [REDACTED] application for household member Applicant 3

Ocean Detailing USA Management Inc 3112 JUPITER PARK CIRCLE UNIT 4 JUPITER FL 33408						Earnings Statement
Employee Name	Social Sec. ID	Employee ID	Check No.	Pay Record	Pay Date	
		4698	4417	10/12/2021 - 10/25/2021	10/28/2021	
Earnings	Rate	Hours	Current	Deductions	Current	Year to Date
Regular Earnings	12.50	35.00	437.50	Federal Tax Social Security Medicare federal tax withheld fica tax withheld medicare tax withheld	41.00 27.13 6.34 10.96 14.88 3.48	2,061.90 1,364.00 319.00 230.58 312.48 73.06
YTD Gross	YTD Deductions	YTD Net Pay	Current Total	Current Deductions	Net Pay	
22,000.00	4,361.04	\$17,638.96	437.50	103.81	\$333.69	

Ocean Detailing USA Management Inc 3112 JUPITER PARK CIRCLE UNIT 4 JUPITER FL 33408						Earnings Statement
Employee Name	Social Sec. ID	Employee ID	Check No.	Pay Record	Pay Date	
		4698	4235	09/28/2021 - 10/11/2021	10/14/2021	
Earnings	Rate	Hours	Current	Deductions	Current	Year to Date
Regular Earnings	12.50	35.00	437.50	Federal Tax Social Security Medicare federal tax withheld fica tax withheld medicare tax withheld	41.00 27.13 6.34 10.96 14.88 3.48	2,020.90 1,336.87 312.66 219.60 297.60 69.80
YTD Gross	YTD Deductions	YTD Net Pay	Current Total	Current Deductions	Net Pay	
21,563.00	4,257.23	\$17,305.27	437.50	103.81	\$333.69	

The County returned the application on several occasions requesting additional information. On December 13, 2021, the County denied the application advising,

Cannot receive rental assistance as both tenant and landlord. Also, claimant ID on your DEO notice has the same claimant number as 2 other clients who list you as their landlord.

**OIG Interview of CoAdvantage Chief Legal Officer Kimberly Robbins**

Ms. Robbins told the OIG that Co-Advantage is the company that manages Ocean Detailing and possesses Ocean Detailing’s employment records. She stated that the employment verification documents for Applicant 3, submitted with Applicant 3’s rental assistance application were forged, and that the company had no record of him ever working for the company.

## OIG Interview of Department of Economic Opportunity - Benefits Program Supervisor Sherri Miller

Ms. Miller informed the OIG that the Claimant ID listed in the documents Applicant 3 submitted to the County was the same Claimant ID listed in the DEO documents submitted with Applicant 1 and Applicant 2's applications. Ms. Miller told the OIG that the Claimant ID had been issued to Applicant 1 when Applicant 1 registered his benefits claim with DEO.

### OIG Interview of Applicant 3

The OIG made multiple attempts to schedule an interview with Applicant 3, but he did not respond.<sup>17</sup>

### Conclusion

Applicant 3 submitted assistance applications Nos. 105107 and 105177, and attested that he provided accurate information to the County. Applicant 3 provided false DEO and FPL documentation with application 105107 for grocery assistance. Applicant 3's application for grocery assistance resulted in inappropriate funding of \$400.

Thereafter, he submitted application No. 105177 for rental assistance, again with falsified supporting documents in the form of a FPL bill statement, DEO documents, and pay statements. The County denied this application. His denied application was an attempt to inappropriately receive \$4,407 in rental assistance.

The allegation is **supported**.

## IDENTIFIED, QUESTIONED, AND AVOIDABLE COSTS

**Identified Costs:** \$20,400

## ACKNOWLEDGEMENT

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

## RECOMMENDED CORRECTIVE ACTIONS

We make one recommendation; that the County seek reimbursement of **\$20,000** in issued funds.

<sup>17</sup> Per publicly available obituaries, it appears that Applicant 3 died on August 8, 2022.

**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 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 2022-0008. The Community Services Department will seek reimbursement for \$20,000 issued to the subject(s) named in this investigation.

**RESPONSE FROM APPLICANT 1**

Pursuant to Article XII, Section 2-427 of the Palm Beach County Code, Applicant 1 was provided the opportunity to submit a written explanation or rebuttal to the finding as stated in the Investigative Report within ten (10) calendar days.

Applicant 1 telephoned the OIG and stated he received the OIG's Draft Report. He wanted to know if the investigation was considered criminal or civil. It was explained to Applicant 1 that OIG is an administrative agency and that the Final Report would be sent to law enforcement. Applicant 1 repeatedly stated that he did not want law enforcement to get involved. Applicant 1 was told he had until the date on the letter to provide an additional response if he chose to, but could also provide further truthful information in reference to the incident while he was on the phone. Applicant 1 responded by saying, "This doesn't help me. That helps on the other end." Applicant 1 stated that he and Applicant 2 did not "do this" together and ended by saying, "Doesn't seem beneficial to keep talking until I talk to someone else."

Applicant 1 did not provide a further written response.

**RESPONSE FROM APPLICANT 2**

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

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