

Letter of Engagement

Successful Bidder: K2 Intelligence

On behalf of the Department of Economic Development Authority, this is notice of the intent to award this IM engagement.

The bid will be awarded to K2 Intelligence whose proposal is most advantageous to the State, price and other factors considered.

The total amount of this contract must not exceed the amount of 124,880.00

The successful bidder is instructed not to proceed until a purchase order is issued.

Thank you for your participation in this bid.

Sincerely,

Mona Cartwright
IM State Contract Manager



New Jersey Economic Development Authority's Engagement Query for Integrity Oversight Monitor November 9, 2020

The New Jersey Economic Development Authority (NJEDA or Authority) is providing this Engagement Query:

- Pursuant to the terms of Governor Murphy's July 17, 2020 Executive Order No. 166 (EO-166);
- Per the requirements of August 2020 Integrity Oversight Monitor Guidelines issued by the State of New Jersey COVID-19 Compliance and Oversight Taskforce (IOM Guidelines); and
- In accordance with the procedures established by the Request for Quotation issued by the Division of Administration, Department of the Treasury for Integrity Oversight Monitoring: Program and Performance Monitoring, Financial Monitoring and Grant Management and Anti-Fraud Monitoring for Coronavirus Relief Funds pursuant to Section 5001 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act COVID-19 Recovery Funds and Programs (IOM RFQ).

EO-166, the IOM Guidelines and the IOM RFQ are all incorporated herein by reference. The capitalized terms in this Engagement Query shall have the same meanings as set forth in the IOM RFQ.

The Integrity Monitor selected as a result of this Engagement Query will be issued a Letter of Engagement to provide the Scope of Work in accordance with the terms and conditions described herein.

A. Background

The NJEDA has implemented a number of programs to address the challenges caused by the COVID19 pandemic and has been central to New Jersey's response to the pandemic's economic impact. The Authority's relief efforts have focused specifically on helping the smallest and hardest-hit businesses weather the pandemic's immediate impacts and prepare for a strong and equitable recovery. To date, we have assisted more than 20,000 small businesses, and we continue to process new applications for relief every day.

The Authority's core COVID-19 relief package consists of six programs:

- the Small Business Emergency Assistance Grant Program;
- the Small Business Emergency Assistance Loan Program;
- the NJ Small and Micro Business PPE Access Program;
- the New Jersey Entrepreneur Support Program;

- partnerships with Community Development Financial Institutions; and
- various technical assistance programs.

The NJEDA has received Coronavirus Relief Funds (CRF) funding for some but not all of these programs. From the CRF funds received by the State of New Jersey, the Treasurer has allocated to the Authority \$164,800,000 (One Hundred Sixty-Four Million, Eight Hundred Thousand Dollars), which is comprised of:

- \$5 million for reimbursement of the Small Business Emergency Assistance Grant Program Phase One;
- \$60 million for Phase 2 of the Small Business Emergency Assistance Grant Program (\$15 million of which was reserved for eligible businesses located in the 12 counties in New Jersey that did not receive CRF funding directly from the U.S. Department of the Treasury);
- \$70 million for Phase 3 of the Small Business Emergency Assistance Grant Program;
- \$4.8 million for administrative costs related to the Small Business Emergency Assistance Grant Program;
- \$3.5 million for Phase 1 of the NJ Small and Micro Business PPE Access Program;
- \$20.4 million for Phase 2 of the NJ Small and Micro Business PPE Access Program; and
- \$1.1 million for administrative costs related to the NJ Small and Micro Business PPE Access Program

Additionally, the NJEDA has utilized its own funds and received funding from other sources to support its COVID-19 programs, including \$30 million from counties that received direct allocations of CRF funds.

The NJEDA's largest COVID-19 relief program is the Small Business Emergency Assistance Grant Program. Launched in early April with \$5 million of NJEDA funds, the Program initially offered grants of up to \$5,000 to a narrowly targeted set of small businesses that included restaurants and in-person retail establishments. By the time the application closed a week later, the Authority had received 34,404 applications, representing an estimated \$117 million in total grant funding requested. The NJEDA expanded Phase 1 of the grant program utilizing \$5 million in funding received through the NJ Department of the Treasury from the Coronavirus Relief Fund ("CRF"), as well as additional funding received from the Casino Reinvestment Development Authority to support impacted entities in Atlantic County. Ultimately, 3,383 applications were approved, representing \$11 million in total grant funding awarded.

In June, the NJEDA launched Phase 2 of the Grant Program utilizing \$45 million in CRF funding (plus \$1 million for administrative costs). Phase 2 expanded the Program to a significantly broader range of businesses and increased the maximum grant award to \$10,000. At the end of July, Governor Murphy announced that another \$15.3 million in CARES Act funding would be dedicated to Phase 2 of the Small Business Emergency Assistance Grant Program. The additional funds were used to fulfill eligible Phase 2 grant applications from businesses located in the 12 New Jersey counties that did not receive direct CARES Act funding allocations from the federal government: Atlantic, Burlington, Cape May, Cumberland, Gloucester, Hunterdon, Mercer, Morris, Salem, Somerset, Sussex, and Warren. The remaining nine counties previously received

their own separate allocations of CARES Act funds. Essex, Ocean and Passaic counties contributed \$10 million each to the NJEDA to allocate to businesses in those three counties through Phase 2 of the Small Business Emergency Assistance Grant Program. Bergen, Camden, Essex, Hudson, Middlesex, Monmouth, Ocean, Passaic, and Union counties are spending their CARES Act funds on other COVID-19 relief programs. To date, the average grant award has been less than \$3,000, meaning the average approved business has three full-time equivalent employees.

Additionally, the NJEDA has implemented a NJ Small and Micro Business PPE Access Program. That program was developed in response to consistent concerns about the need for readily available, fairly priced PPE to accelerate economic recovery. The NJ Small and Micro Business PPE Access Program is designed to make PPE more easily available to all the small and micro businesses and non-profit organizations in the state, to prevent the spread of the COVID-19. The Authority received \$4 million in CRF funding for Phase 1 of the PPE Access Program, which included: \$3,500,000 for subsidizing up to 20% of a Designated Vendor's purchase of PPE manufactured or assembled in New Jersey, or sourced from a small wholesaler in a historically underserved community; \$300,000 for the cost of NJEDA technology development, marketing, and promotional efforts; and \$200,000 for other administrative costs in administering the Program. The Treasurer recently allocated additional funds to the NJEDA for Phase 2: \$20,400,000 for PPE purchase subsidies for small and micro business plus \$600,000 for administrative expenses.

Pursuant to the IOM Guidelines, the NJEDA is responsible for conducting a risk assessment to assess the risk to public funds and whether its internal controls are adequate to mitigate or eliminate risk using the Risk Assessment Matrix attached to the IOM Guidelines.

B. Detailed Scope of Work

1. Risk Assessment

The IOM engaged by the NJEDA will work with the NJEDA's Accountability Officer and other staff to conduct a risk assessment of the COVID-19 Recovery Programs described in Part A above ("Risk Assessment"). The Risk Assessment shall include a review of NJEDA's ability to comply with the CARES Act, or other federal statutory and regulatory requirements as well as applicable state law and regulations of the COVID-19 Recovery Programs described in Part A. The Risk Assessment shall comply with the requirements of the IOM Guidelines. At minimum, the Integrity Monitor shall assess the risk inquiry areas set forth on the Risk Matrix at Attachment 1.

2. Monitoring

The IOM engaged will be responsible for monitoring the NJEDA's compliance with applicable agreements, federal and State regulations and guidelines with the intent to safeguard COVID-19 Recovery Funds. This may include:

- Evaluating program performance;
- Evaluating internal controls;
- Validating compliance with applicable Memoranda of Understanding regarding use and reporting requirements for CRF Funds;
- Interviewing staff;

- Sampling eligibility determinations and denials of applications;
- Reviewing document retention policies and processes; and
- Other tasks listed in the IOM Guidelines or deemed appropriate as directed by NJEDA.

C. Specific Performance Milestones/Timelines/Standards/Deliverables

1. Risk Assessment

The IOM engaged by the NJEDA shall deliver a draft Risk Assessment within thirty (30) days of receiving a Letter of Engagement but no later than December 15, 2020 (whichever is earlier). The NJEDA will provide written feedback within one week. The IOM will finalize and transmit the final Risk Assessment within one week of receiving the NJEDA's feedback but no later than December 30, 2020 (whichever is earlier).

2. Reporting Requirements

a. Quarterly Reports

As required by EO-166 and the IOM Guidelines, the IOM engaged by the NJEDA shall submit a draft quarterly report to the NJEDA on or before December 15, 2020, detailing the specific services rendered to date and any findings of waste, fraud or abuse. The NJEDA will have the opportunity to respond to the findings within one week following receipt of the IOM's draft report. On or before December 30, 2020, the IOM engaged by the NJEDA will deliver its final quarterly report and any response from the NJEDA to the State Treasurer, who will share the reports with the Governor's Disaster Recovery Office (GDRO), the Senate President, and the Speaker of the General Assembly, the Attorney General, and the State Comptroller. The IOM's quarterly reports will be posted on the GDRO transparency website pursuant to EO-166. Integrity Monitor Quarterly Reports shall be completed using the CRF Integrity Monitor Report Template at Attachment 2.

In the event this Engagement is extended beyond the expiration date set forth below, the IOM shall submit draft quarterly reports to NJEDA on the last day of the quarter detailing the specific services rendered during that quarter and any findings of waste fraud and above. The NJEDA will have the opportunity to respond to the findings within one week following receipt of the IOM's draft report. Fifteen business days after each quarter-end, the IOM shall deliver its final quarterly reports, inclusive of any comments from the NJEDA, to the State Treasurer, who shall share the reports with the GDRO, the Senate President, and the Speaker of the General Assembly, the Attorney General, and the State Comptroller. The Integrity Monitor quarterly reports will be posted on the COVID-19 transparency website pursuant to E.O. 166.

b. Reports of Waste, Fraud, Abuse or Potential Criminal Conduct

The IOM shall immediately report issues of waste, fraud, abuse and misuse of COVID-19 recovery funds to the GDRO, Office of the State Comptroller (OSC), the State Treasurer, the Contract Manager, and the NJEDA's Accountability Officer. The IOM shall report issues of potential criminal conduct to the Office of the Attorney General.

c. Additional Reports

In accordance with E.O. 166, OSC may request that the IOM issue reports or prepare memoranda that will assist the OSC in evaluating whether there is waste, fraud, or abuse in COVID-19 Recovery Programs covered by this Engagement. OSC may also request that the IOM share any corrective action plan(s) prepared by NJEDA to evaluate whether those corrective plan(s) have been successfully implemented.

D. Liquidated Damages (for the failure to meet any required milestones, timelines, or standards or deliverables)

The IOM's failure to comply with the requirements of the contract, including but not limited to EO-166, the IOM RFQ, the IOM Guidelines and this Engagement Query may constitute a breach of contract and may result in termination of the contract by the NJEDA or imposition of such other remedy as the Authority deems appropriate.

At the Authority's option, such a breach of contract may result in the imposition of liquidated damages. The NJEDA and the IOM agree that it would be extremely difficult to determine actual damages which the NJEDA will sustain as the result of the IOM's failure to meet its contractual requirements. Any breach by the IOM: could prevent the NJEDA from complying with EO-166, the IOM Guidelines, and laws applicable to the use and expenditure of CRF and other public funds; will adversely impact the NJEDA's ability to ensure identification and mitigation of risks; and may lead to damages suffered by the NJEDA and the State as a whole. If the IOM fails to meet its contractual obligations, the Authority may assess liquidated damages against IOM as follows:

Failure to deliver a draft Risk Assessment within thirty (30) days of receiving a Letter of Engagement or by 12/15/20 (whichever is earlier)	\$500/day
Failure to deliver a final Risk Assessment by 12/30/20	\$1,000/day
Failure to deliver a quarterly report by 12/30/20	\$500/day
After January 1, 2020, failure to deliver subsequent final quarterly reports within 15 days after the Quarter end.	\$500/day

The Parties agree that these liquidated damages are reasonable estimates of the damages the NJEDA may sustain if the IOM fails to meet its contractual obligations and are not to be construed as penalties.

The Authority has the sole discretion to determine whether liquidated damages should be assessed. Assessment of liquidated damages shall be in addition to, and not in lieu of, such other remedies as may be available to the NJEDA.

Upon determination that liquidated damages are to be assessed, the Authority shall notify the IOM of the assessment in writing. The Authority may, in its sole discretion, give the IOM an opportunity to cure depending on the situation. The Authority may elect to notify the IOM that

liquidated damages may be assessed so as to provide a warning, prior to assessing liquidated damages, but if the Authority does not provide such a warning the Authority is not precluded from assessing liquidated damages. Failure to assess liquidated damages or to demand payment of liquidated damages within any period of time shall not constitute a waiver of such claim by the Authority.

Once assessed, the Authority will deduct liquidated damages from any moneys it owes to the IOM, and in the event the amount due the IOM is not sufficient to satisfy the amount of the liquidated damages, the IOM shall pay the balance to the NJEDA within thirty (30) calendar days of written notification of the assessment. If the amount due is not paid in full, the balance will be deducted from subsequent payments to the IOM.

During the engagement, the Authority's Accountability Officer, Christine Baker, shall serve as the Authority's point of contact.

Questions regarding this Engagement Query:

Any questions related to the Scope of Work must be submitted electronically by 3:00PM on November 12, 2020. They must be submitted via email to [REDACTED] and [REDACTED].

Submission of Proposals:

Detailed proposals in response to this Engagement Query shall be submitted electronically by 3:00PM on November 16, 2020. They must be submitted via email as set forth below:

TO: State Contract Manager
Mona Cartwright, Fiscal Manager, Department of the Treasury
[REDACTED]

With a copy to the Agency Contract Manager:
Christine Baker, Accountability Officer/Senior Vice President
[REDACTED]

Proposal Content:

At minimum, the Integrity Monitor's proposal shall include the following:

- 1) A detailed plan to perform the scope of work with a person/hour and staff classification mix proposed to meet the scope of work of this Engagement Query. The proposal must explain how the Integrity Monitor intends to accomplish each component of the scope of work.
- 2) A detailed budget to perform the scope of work reflecting the Price Schedule submitted by the Integrity Monitor in response to the IOM RFQ.

- 3) A schedule identifying the deliverables to be submitted under this Engagement Query.
- 4) Identification of any potential conflicts of interest regarding the delivery of services for the scope of work under this Engagement Query.

Selection Process:

The Agency Contract Manager will review the proposal(s) received and select the Integrity Monitor whose proposal is most advantageous, price and other factors considered.

Prior to issuing a Letter of Engagement, the Agency Contract Manager/Accountability Officer will independently determine whether the proposed Integrity Oversight Monitor has any potential conflicts with the Engagement.

The State Contract Manager will then issue a Letter of Engagement with a “not to exceed” clause to the selected proposer.

Duration of the Engagement:

The Engagement will commence upon the issuance of a Letter of Engagement and expire on December 30, 2020. At the option of NJEDA, this Letter of Engagement may be extended if the deadline for use of Coronavirus Relief Funds is extended under the CARES Act. Any extension to this Letter of Engagement, however, may not exceed the Contract Term, and any extensions thereto, as set forth in Section 5.2 of the IOM RFQ.

Notice of Executive Order 166 Requirement for Posting of Winning Proposal and Contract Documents

Pursuant to Executive Order No. 166, signed by Governor Murphy on July 17, 2020, the Office of the State Comptroller (“OSC”) is required to make all approved State contracts for the allocation and expenditure of COVID-19 Recovery Funds available to the public by posting such contracts on an appropriate State website. Such contracts will be posted on the New Jersey transparency website developed by the Governor’s Disaster Recovery Office (GDRO Transparency Website). The Letter of Engagement resulting from this Engagement Query is subject to the requirements of Executive Order No. 166. Accordingly, the OSC will post a copy of the Letter of Engagement, including the Engagement Query, the winning proposer’s proposal and other related contract documents for the above contract on the GDRO Transparency website.

In submitting its proposal, a proposer may designate specific information as not subject to disclosure. However, such proposer must have a good faith legal or factual basis to assert that such designated portions of its proposal: (i) are proprietary and confidential financial or commercial information or trade secrets; or (ii) must not be disclosed to protect the personal privacy of an identified individual. The location in the proposal of any such designation should be clearly stated in a cover letter, and a redacted copy of the proposal should be provided. A Proposer’s failure to designate such information as confidential in submitting a proposal shall result in waiver of such claim.

The State reserves the right to make the determination regarding what is proprietary or confidential and will advise the winning proposer accordingly. The State will not honor any attempt by a winning proposer to designate its entire proposal as proprietary or confidential and will not honor a claim of copyright protection for an entire proposal. In the event of any challenge to the winning proposer’s assertion of confidentiality with which the State does not concur, proposer shall be solely responsible for defending its designation.

Risk Matrix

Agency/ Authority:	
Program:	
Funding Source:	
Recipient or Subrecipient:	
Completed By:	
Date:	

Risk Inquiry Areas	Rating Element	Summary Assessment/Description of Risks Identified	Risk Level (Low, Medium, High)
Inquiry 1			
Organizational leadership, capacity, expertise, and experience managing and accounting for federal grant funds in general, and disaster recovery funds in particular.	Assess your agency's experience and staffing capacity to manage and account for federal grant funds and/or disaster recovery funds. Considerations include: your agency's organizational structure, supervisory roles, delegation of authority, line level staffing capacities, experience at all levels, and responsibilities and relations within and between different divisions or offices within your agency. Does your agency have a monitoring and oversight plan to assess your continued performance and compliance with the CARES fund requirements, federal and state laws and regulations? Does that plan include an assessment of internal controls, review of risks, threats and prevention and detection of fraud, waste, and abuse? How will your agency address risk areas and the need for corrective action?		
Inquiry 2			
Input from the individuals/units that will be disbursing funds or administering the program.	How will your agency plan for the use of the CARES funds? Does your plan include considerations for federal and state requirements and eligible uses of the funds? Does your plan establish adequate funding and staffing requirements for administering the funds? Is your plan consistent with your statutory mission and the CARES fund objectives? Does your plan include or contemplate the inclusion of input from line staff that are administering the program?		
Inquiry 3			
Review of existing internal controls and any identified weaknesses.	Has your agency reviewed its internal controls to ensure that policies and procedures are in place to satisfy the CARES fund requirements, federal and state laws and regulations? Are your agency policies and procedures adequate? Are they updated for all relevant processes required for the administration of the CARES funds? Does your agency have a monitoring and oversight plan to assess your continued performance and compliance with the CARES fund requirements, federal and state laws and regulations? Does that plan include an assessment of internal controls, review of risks, threats and prevention and detection of fraud, waste, and abuse? How will your agency address risk areas and the need for corrective action?		
Inquiry 4			
Prior audits and audit findings.	Has your agency been audited in the past? Have you considered and addressed any prior audit findings and recommendations that may be applicable to your success in overseeing COVID stimulus funding?		
Inquiry 5			
Lessons learned from prior disasters.	Has your agency been audited after a previous disaster? Have you considered and addressed any findings and recommendations from such audit(s)?		
Inquiry 6			

Sub-recipient internal control weaknesses, if applicable.	If your agency is overseeing sub-recipients, have the sub-recipients been the subject of prior negative audit findings and recommendations that could impact oversight? How will your agency ensure that sub-recipients adhere to all requirements relating to their receipt of funds, including their use of funds and the reports they will be required to submit documenting their use of such funds?		
Inquiry 7			
Adequacy of financial, acquisition, and grants management policies and procedures, including technological capacity and potentially outdated financial management systems.	When is the last time there was an assessment of financial, acquisition, and grants management policies and procedures? Is technological capacity an issue? Are the financial management systems adequate or outdated? Have the systems been updated or can they be updated to function adequately for the administration of the CARES funds?		
Inquiry 8			
Barriers to reporting.	Does your agency have, or intend to develop, templates/forms or other documentation to report the results of the funding awards, including how your agency will respond to oversight bodies seeking to ascertain who received funds, the amount of funds, and the date funds were distributed?		
Inquiry 9			
Experience with state and federal procurement processes, value of anticipated procurements, and reliance on contractors to meet program goals and objectives.	Assess and evaluate your agency's procurement processes and experience with state and federal procurement requirements. Do you have a trained and qualified contract manager assigned to the contract? Do your contracts contain provisions to ensure that contracted vendors provide all necessary reports in the form/manner proscribed by contract? Have your contract templates been reviewed and checked for necessary state and federal contract language? If emergency contracts have been entered into, how do you plan to transition after the urgent need has ended? Do you have plans to conduct a cost analysis?		
Inquiry 10			
Potential conflicts of interests and ethics compliance.	Evaluate the means used to ensure that there is adequate separation of duties surrounding program funding requests and determinations. Does your agency have a code of conduct or policy describing measures to guard against potential conflicts of interest?		
Inquiry 11			
Amount of funds being disbursed to a particular category of sub-recipient and the complexity of its project(s).	Evaluate the guidance, policies and procedures, or other documents that are being used to ensure that your agency properly oversees the sub-recipients' use of funds, including those relating to internal recordkeeping, monitoring, and sub-recipient reporting. Does your agency have a plan to monitor sub-recipients' compliance with program requirements and those outlined in Uniform Grant Guidance 2 C.F.R. 200.331 (Requirements for pass through entities)? Does that plan assess risk of sub-recipients? Does that plan include training and training documents? Have you prepared templates or other reporting forms that you will be providing to sub-recipients? Has your agency developed a plan to address sub-recipient noncompliance?		
Inquiry 12			
Whether federal or state guidelines provide guidance regarding the uses of funds (i.e., discretionary vs. restrictive).	Evaluate how eligibility determinations will be made? Does your agency have written guidance or policies and procedures that provide direction in making and documenting eligibility determinations? Is the completeness and accuracy of information used in eligibility determinations verified? If so, how? By whom? Is there supervisory review and approval in this process?		

Note: This risk assessment tool may not include all relevant risk factors for your particular agency. Each agency should undertake a review to determine whether any additional risk areas should be reviewed, should identify those areas here, and should analyze them in accordance with the format of this tool.

Integrity Monitor Firm Name: _____
 Engagement: _____
 Quarter Ending: _____

No.	Recipient Data Elements	Response	Comments
A. General Info			
1.	Recovery Program Participant		
2.	Federal Funding Agency (e.g. Section 5001 of CARES Act)		
3.	State Funding (if applicable)		
4.	Award Type		
5.	Award Amount		
6.	Accountability Officer		
7.	Brief Description Purpose and Rationale of Integrity Monitor Project/Program		
8.	Contract/Program Location (if applicable)		
9.	Amount Expended by Recovery Program Participant to Date		
10.	Amount Provided to other State or Local Entities		
11.	Completion Status of Contract or Program		
12.	Expected Contract End Date/Time Period		
B. Monitoring Activities			
13.	If FEMA funded Brief description of the status of the project worksheet and its support.		
No. Recipient Data Elements			
14.	Quarterly Activities/Project Description (include with specificity activities conducted such as meetings document review staff training etc)		
15.	Brief description to confirm appropriate data/information has been provided by recipient and what activities have been taken to review in relation to the project/contract/program.		
16.	Description of quarterly auditing activities that have been conducted to ensure procurement compliance with terms and conditions of the contracts and agreements.		
17.	Has payment documentation in connection with the contract/program been reviewed? Please describe		
18.	Description of quarterly activity to prevent and detect waste fraud and abuse.		
19.	Provide details of any integrity issues/findings		
20.	Provide details on any other items of note that have occurred in the past quarter		
21.	Provide details of any actions taken to remediate waste fraud and abuse noted in past quarters		
No. Recipient Data Elements			
C. Miscellaneous			
22.	Attach a list of hours (by employee) and expenses incurred to perform your quarterly integrity monitoring review		
23.	Add any item issue or comment not covered in previous sections but deemed pertinent to monitoring program.		

Name of Integrity Monitor: _____ Name of Report Preparer: _____
 Signature: _____
 Date: _____



New Jersey Economic Development Authority's Engagement Query for Integrity Oversight Monitor November 9, 2020

Prepared For:

The New Jersey Economic Development Authority

Attention:

State Contract Manager

Mona Cartwright, Fiscal Manager, Department of the Treasury

[REDACTED]

Cc:

Agency Contract Manager:

Christine Baker, Accountability Officer/Senior Vice President

[REDACTED]

November 16, 2020

Mona Cartwright, State Contract Manager, Fiscal Manager
Department of the Treasury
State of New Jersey
PO Box 211
Trenton, NJ 08625

November 16, 2020

**New Jersey Economic Development Authority's Engagement Query for Integrity Oversight Monitor
November 9, 2020**

Dear Ms. Cartwright,

We are pleased to submit our response to the Engagement Query for an Integrity Oversight Monitor.

K2 Intelligence, LLC ("K2") is an industry-leading integrity monitoring, investigative, compliance, and cyber defense services firm founded in 2009 by Jeremy M. Kroll and Jules B. Kroll, the originator of the modern corporate investigations industry. In late 2019, K2 merged with the **Financial Integrity Network**, a premier strategic advisory firm dedicated to helping clients achieve their financial integrity goals. By merging resources and expertise, **K2-FIN** seeks to revolutionize how organizations and jurisdictions manage risk, gather intelligence, protect themselves from illicit activity, and enhance business opportunities.

K2-FIN is uniquely positioned to assist the New Jersey Economic Development Authority with the Integrity Oversight Monitoring, given the depth and breadth of our experience in working with public sector oversight bodies in New Jersey and elsewhere to identify and root out actual or suspected fraud, waste, and abuse on public sector projects. We would be happy to discuss any elements of this response with you at your convenience.

Please contact Paul Ryan at 212-845-7517 or pryan@k2intelligence.com if you have any questions regarding this proposal.

Yours sincerely,



Snezana Gebauer
Executive Managing Director

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1. About K2 Intelligence Financial Integrity Network

K2 Intelligence, LLC is an industry-leading integrity monitoring, investigative, compliance, and cyber defense services firm founded in 2009 by Jeremy M. Kroll and Jules B. Kroll, the originator of the modern corporate investigations industry. The Financial Integrity Network is a premier strategic advisory firm dedicated to helping clients achieve their financial integrity goals. By merging resources and

expertise, K2-FIN seeks to revolutionize how organizations and jurisdictions manage risk, gather intelligence, protect themselves from illicit activity, and enhance business opportunities. Together, our combined firm sits at the intersection of the public and private sectors as a trusted source of expertise and sound judgment.

K2-FIN advises governments, companies, boards, and individuals in business areas including integrity monitoring, investigations and disputes, regulatory compliance, cyber defense, construction and real estate, strategic risk and security, and private client services. We also assist financial institutions, sectoral clients, and governments with strategic advisory, policy, controls, and training to protect against the full range of illicit financing threats.

K2-FIN is known for its strategic application of technology. Whether it is sophisticated digital forensic tools, deep web search capabilities, or sophisticated analytic platforms for interrogating massive data sets, we have consistently produced remarkable – and remarkably efficient – results for clients by knowing how and when to employ cutting-edge technology.

With offices in New York, London, Washington, DC, Madrid, Geneva, Los Angeles, and Chicago, our teams include former prosecutors, lawyers, senior government advisors, regulators, compliance officers, law enforcement and intelligence professionals, forensic accountants, investigative journalists, technology professionals, and academics, each bringing a unique set of investigative and advisory skills and perspectives to the client situation.

K2-FIN is simply unmatched by any other firm in the number of years providing compliance and integrity monitoring services, the number and depth of in-house resources necessary to provide those services, and the number agencies who can vouch for the value of our integrity monitoring services. For more than twenty years, we have specialized in the design, implementation and management of proactive compliance and integrity monitoring protocols – it is, in fact, a core competency of our firm.



FOR MORE THAN TWENTY YEARS, WE HAVE
SPECIALIZED IN THE DESIGN, IMPLEMENTATION
AND MANAGEMENT OF PROACTIVE
COMPLIANCE AND INTEGRITY MONITORING
PROTOCOLS – IT IS, IN FACT, A CORE
COMPETENCY OF OUR FIRM.

2. Relevant Experience

In addition to K2-FIN's relevant engagements described below, our team members have experience overseeing disaster and stimulus funding in their prior roles. As an example, members of our team have overseen the disbursement and use of the American Recovery and Reinvestment Act of 2009 ("ARRA").

The New York State Inspector General (“NYS IG”) was selected to oversee a panel that ensured \$31 billion in ARRA funds allocated to New York were utilized with transparency and accountability as well as preventing fraud, waste, abuse, and mismanagement. While at the NYS IG, Paul Ryan, K2-FIN’s proposed Principal, oversaw and assisted with these efforts.

Ray Dookhie, K2-FIN’s proposed Program Manager, in a prior role, assisted the Commonwealth of Massachusetts with the development of its anti-fraud programs and controls in connection with distribution of federal grant funds from the ARRA. Ray designed an anti-fraud framework and related guidance that various agencies must implement to prevent, detect, and respond to fraud. In addition, he developed an awareness training for program stakeholders and agencies. Specific program elements included, fraud risk assessment, code of conduct, whistleblower mechanisms, financial controls and documentation, auditing and monitoring protocols including the use data analytics and technology.

Below are just some of the relevant matters that demonstrate K2-FIN’s experience performing integrity monitoring engagements.

- The State of New York established the Governor’s Office of Storm Recovery (“GOSR”) following Hurricane Irene, Tropical Storm Lee, and Hurricane Sandy to centralize recovery and rebuilding efforts in the impacted areas throughout New York State. GOSR paired approximately \$4.4 billion in flexible funding made available by the U.S. Department of Housing & Urban Development with additional federal funds awarded to other State agencies to enable homeowners, small business, and entire communities recover.
- Since September 2013, K2-FIN has served as a Program Oversight and Compliance Monitor reporting to the Director of Investigations and Senior Counsel. In addition to our continuing onsite and desk audit monitoring activities, we have performed special investigative assignments and performed due diligence relating to select sub-recipients. We designed GOSR’s vendor screening protocols, performed site security assessments on GOSR’s physical assets made recommendations to strengthen federal regulatory compliance reporting, performed risk assessments of policies and procedures relating to assistance application processing, and performed reviews to ensure compliance with established policies and procedures.
- K2-FIN led the first large-scale deployment of project oversight, integrity monitors in a disaster recovery setting. Working with the Port Authority of New York and New Jersey at Ground Zero, our integrity monitors were engaged by the City of New York and were involved at every phase of the World Trade Center recovery effort from contract award to on- site activity. The message the City of New York conveyed through its use of our integrity monitors was clear – integrity counted. Cleanup was on time and under budget. In fact, some estimates credited the integrity monitors with more than \$60 million dollars in anti-fraud savings. In 2006, a U.S. House of Representatives subcommittee heralded the World Trade Center Integrity Monitorship Program as “an overwhelming success,” adding that the program was so effective because it was preventative in nature, with monitors calling for immediate corrections and remediation in real time versus after-the-fact auditing discoveries.
- The State of New Jersey, through a competitive process, prequalified a number of firms to provide auditing and integrity monitoring, among other services, on a large number of Superstorm Sandy recovery and rebuilding projects. The firms are selected on a per-engagement basis through individualized responses to proposals. The program began in August 2013. K2-FIN was selected

to provide integrity monitoring services for two engagements – the City of Elizabeth’s Veterans Memorial Waterfront Park and the City of Perth Amboy’s Marina and Walkways.

- The City of Elizabeth Veteran’s Memorial Waterfront Park project involved the rebuilding of the entire waterfront, including the memorial park, the municipal marina and the recreation and boardwalk piers. The estimated construction value for this project is \$16.2 million. The City of Perth Amboy project involved the rebuilding of seven areas, including the Promenade at the Old Ferry Terminal, a beachfront promenade, and a fishing pier. The estimated construction value for this project is \$8 million. Both projects involved performing risk assessments and recommending loss prevention strategies to prevent duplication of benefits, inefficiency, fraud, waste, abuse, malfeasance and mismanagement of funds determining if appropriate compliance systems and controls related to internal controls, procurement – including the New Jersey Local Public Contract Law, contracting, compliance, cost eligibility, contract management, invoicing, payment, are in place to comply with applicable State and federal guidelines and regulations – including compliance with FEMA funding guidelines and regulations – and to test and monitor control environments. Our team made several contributions directly leading to the establishment of revised and enhanced institutional controls specifically related to procuring future services, as well as identifying several thousand dollars in suspected product substitutions.
- We are currently serving as IOM, reviewing the \$40 Million contract of HNTB and the \$11 Million contract of BEM Environmental, to assist NJT in program management on Sandy recovery and resilience projects. In close consultation with NJT, we prepared risk assessments on these engagements, and are presently reviewing expenditures in what are primarily a “look-back” forensic audit assignments. Previously, we performed IOM services for NJT on the \$13.3 million Gladstone Poles & Foundations Replacement Project. The Gladstone Poles & Foundations project involved the installation of new concrete foundations and steel poles for the catenary lines on the Gladstone Branch of NJT’s Morris & Essex Line damaged as a result of Superstorm Sandy. K2 monitored the work of the contractor and conducted field spot checks on work performed in the field to ensure that NJT policies and procedures were followed.
- We served as the Integrity Monitor on several projects at the WTC site during the rebuilding of the site following the 9/11 terrorist attacks, including the \$4.5 billion Hub and \$1 billion Memorial projects. These multi-billion-dollar PANYNJ projects involved the construction of a major mass transit hub and related infrastructure, the iconic 9/11 museum, retail space, and the site’s central chiller plant. We employed our intelligence-based approach to design and implement an integrity monitoring program for these projects. This approach drives our risk assessments, corruption prevention programs, and review and assessment of the adequacy of controls on all phases of the projects, to ensure that all transactions are conducted and documented in such a way as to be both transparent and auditable. Our findings and recommendations resulted in improvements to project processes and integrity controls in the areas of prevailing wage compliance, M/WBE program compliance, procurement, subcontractor vetting, construction processes, project finances, requisition reviews, environmental and safety compliance, physical site security, and information security. We played a special role in monitoring the cleanup following Superstorm Sandy, which resulted in severe flooding throughout the site. Immediately after Superstorm Sandy we were tasked by PAOIG to design and implement integrity controls that would prevent time and materials abuse. The controls that we designed became the site-wide standard for preventing fraud during

the post-Sandy clean-up and recovery stage at WTC projects.

- Similar to the Moynihan Train Hall project, K2-FIN was also selected by New York's Empire State Development Corporation as the integrity monitor for the Javits Center Expansion project, a five-year assignment to protect New York State's investment of more than \$1.5 billion. Similar in work scope, K2-FIN assists in providing necessary payment and compliance oversight as well as construction monitoring. This engagement has included screening of vendors and other providers of services to the project.
- In 2012, the Metropolitan Transportation Authority ("MTA") selected K2-FIN to serve as an Independent Compliance Monitor for construction of the \$10+ billion East Side Access project. Since then, we have worked in close cooperation with the MTA and the contractors to foster a collective commitment to compliance, to deter and detect fraud, waste, and abuse, and to protect the reputation of the MTA.
- In 2016, the MTA tasked K2-FIN with conducting a voluntary assessment of the New York City Transit Authority's ("NYCT," an authority within the MTA) internal controls relating to the grant drawdown process for Hurricane Sandy Program Projects funded by Federal Transit Authority ("FTA") grant monies. The purpose of K2-FIN's assessment was to detect and address potential weaknesses in payment processing and strengthen its internal controls over the grant drawdown process on applicable NYCT capital projects.
- We are currently serving as the integrity monitor on NJDEP's \$380 million Hudson River and Meadowlands Projects under the Rebuild by Design Program. Both projects encompassed performing risk assessments and recommending loss prevention strategies to prevent duplication of benefits, inefficiency, fraud, waste, abuse, malfeasance and mismanagement of funds determining if appropriate compliance systems and controls related to internal controls, procurement, contracting, compliance, cost eligibility, contract management, invoicing, payment, are in place to comply with applicable State and Federal guidelines and regulations and to test and monitor control environments.
- K2-FIN was selected by New York's Empire State Development Corporation as the integrity monitor for the Moynihan Train Hall project, a five-year assignment to protect New York State's investment of more than \$1.5 billion. As the integrity monitor for this iconic New York City project, K2-FIN assists in providing necessary payment and compliance oversight as well as construction monitoring. This engagement has included screening of vendors and other providers of services to the project.
- The City of New York utilized K2-FIN integrity monitors in the City's Rapid Repair Program – a program designed to help residential property owners affected by Superstorm Sandy make emergency repairs while sheltering in their own homes. Our work included not only monitoring the actual repair work, but working closely with the City of New York to ensure that the project was being managed appropriately, that assistance qualifications were properly met, and to enhance controls and oversight.

- We were selected by the U.S. Federal Reserve Board (“FRB”) and international regulators to serve as the independent consultant responsible for performing an annual review of OFAC compliance policies, procedures, and remedial actions at one of the largest multinational financial institutions in the world, pursuant to the terms of a global consent order entered into by the institution stemming from violations of U.S. sanctions laws. Over the course of the engagement we will continue to monitor, test and assess the development of the institution’s OFAC compliance program, validate the implementation of our recommendations, and report our findings to the institution as well as the relevant regulatory agencies.
- The New York State Department of Financial Services (“NYDFS”) retained our Financial Crimes Risk and Compliance team to act as the independent monitor for a global financial institution pursuant to the consent order entered into between the institution and NYDFS. Per the consent order, we have been tasked with conducting a comprehensive review of the institution’s programs, policies, and procedures now in place that pertain to or affect activities conducted by or through the financial institution for compliance with applicable requirements, laws, and regulations. The order also requires us to conduct a historical transaction review for a time period of three years.

3. Background and Our Understanding of Your Needs

K2-FIN understands that the New Jersey Economic Development Authority (“NJEDA” or “Authority”) has issued an Engagement Query for Integrity Monitoring services pursuant to the terms of Governor Murphy’s July 17, 2020 Executive Order No. 166 (EO-166). We also understand that the Integrity Monitor selected as a result of this Engagement Query will be issued a Letter of Engagement to provide the Scope of Work in accordance with the terms and conditions described herein.

We also understand that the NJEDA has implemented a number of programs to address the challenges caused by the COVID19 pandemic and has been central to New Jersey’s response to the pandemic’s economic impact. The NJEDA has received Coronavirus Relief Funds (“CRF”) funding for some but not all of these programs. From the CRF funds received by the State of New Jersey, the Treasurer has allocated to the Authority \$164,800,000. Additionally, the NJEDA has utilized its own funds and received funding from other sources to support its COVID-19 programs, including \$30 million from counties that received direct allocations of CRF funds.

Pursuant to the IOM Guidelines, the NJEDA is responsible for conducting a risk assessment to assess the risk to public funds and whether its internal controls are adequate to mitigate or eliminate risk using the Risk Assessment Matrix attached to the IOM Guidelines.

We further understand that NJEDA requires the following detailed Scope of Work.

Risk Assessment

The IOM engaged by the NJEDA will work with the NJEDA’s Accountability Officer and other staff to conduct a risk assessment of the COVID-19 Recovery Programs described in Part A above (“Risk Assessment”). The Risk Assessment shall include a review of NJEDA’s ability to comply with the CARES Act, or other federal statutory and regulatory requirements as well as applicable state law and regulations of the COVID-19 Recovery Programs described in Part A of the Engagement Query. The Risk Assessment shall comply with the requirements of the IOM Guidelines. At minimum, the Integrity Monitor shall assess the risk inquiry areas set forth on the Risk Matrix provided by NJEDA.

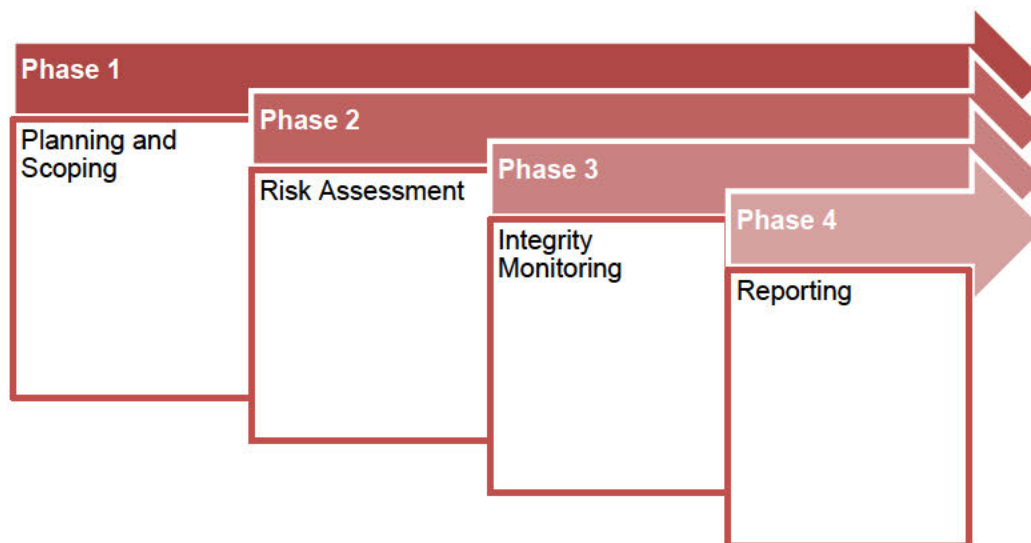
Monitoring

The IOM engaged will be responsible for monitoring the NJEDA’s compliance with applicable agreements, federal and State regulations and guidelines with the intent to safeguard COVID-10 Recovery Funds. This may include:

- Evaluating program performance;
- Evaluating internal controls;
- Validating compliance with applicable Memoranda of Understanding regarding use and reporting requirements for CRF Funds;
- Interviewing staff;
- Sampling eligibility determinations and denials of applications;
- Reviewing document retention policies and processes; and
- Other tasks listed in the IOM Guidelines or deemed appropriate as directed by NJEDA.

4. Proposed Approach

Upon notification of an award and execution of a written engagement letter, K2-FIN professionals will work closely with NJEDA to plan and conduct the following the following four-phases of work to assist NJEDA in achieving its objectives:



4.1.1. Phase 1: Planning and Scoping

OBJECTIVE

During this phase of work, K2-FIN will work with the NJEDA to plan and scope the project to ensure that key stakeholders are aligned with the project objectives, related deliverables, and timelines.

4.1.1.1. Key Work Steps

This will include the following work steps:

- Project kickoff meeting
 - During this initial phase of work, K2-FIN will coordinate a project kickoff meeting with key NJEDA personnel.
 - The purpose of the kickoff meeting is to ensure that all stakeholders are aligned on the project objectives, scope, timelines, and deliverables.
- Preparation of an Information Request
 - K2-FIN will prepare a preliminary information request including relevant policies, procedures, and internal controls implemented by NJEDA. This may include, but will not necessarily be limited to the following:
 - Documentation evidencing processes, controls and technologies implemented to support the execution of Section 5001 of the CARES Act

- Results of quality assurance reviews and assessments associated with the payments process to ensure that they are following Federal and State regulations
- Grants management policies and procedures
- Accounting policies and procedures including, but not limited, procurement, payments, expense reimbursement process, financial reporting, and accounts reconciliation process
- Code of conduct, compliance program, and other governance related documentation
- Results of prior risk assessments and related risk and control matrix
- Audit reports including the identification of prior internal control deficiencies and management's response regarding the same
- Finalized workplan
 - At the conclusion of this phase of work, K2-Fin will provide a final audit plan for review and finalization
 - The audit plan will be a tailored version of this approach document and include project-specific objectives and key work steps

4.1.2. Phase 2: Risk Assessment

OBJECTIVE

During this phase of work, K2-FIN will perform a risk assessment inclusive of an evaluation of the NJEDA inherent program risks as well as the established controls to mitigate such risks.

4.1.2.1. Key Work Steps

K2-FIN professionals will work closely with NJEDA personnel to coordinate and perform the following tasks to achieve the project objectives for Risk and Control Assessment:

- K2-FIN will assess the operational and fraud risks that are associated with NJEDA's COVID-19 Recovery Programs (including the risks of asset misappropriation, financial reporting fraud, and violation of Federal or State laws, regulations, or established grant management protocols).
- The purpose of the assessment will be to identify potential areas where NJEDA may be susceptible to greater program risk (e.g., past compliance issues, adverse audit findings, non-compliance with reporting requirements, areas with significant financial reporting errors, undocumented transactions, reliance on manual controls, history of unsatisfactory performance). K2-FIN will assess the design of the controls established by NJEDA to mitigate the inherent program risks.
- This will include a review of relevant program documents and policies and procedures identified and collected as part of the planning and scoping phase (e.g., results of prior risk assessments and related risk and control matrix). This will also include a review of applicable federal and state laws and regulations as well as existing budgets, grant disbursement reports, programmatic documentation, written accounting policies and procedures, controls manuals, and documentation of prior internal control deficiencies and management's response regarding the same.

- Specifically, we will identify, review, and assess all relevant processes and functions, including financial, procurement, and grants management, grant award including sub-recipient eligibility determinations, conflicts of interests and enhancing ethics compliance, sub-recipients' use of funds and compliance with sub-recipient reporting, recordkeeping and grant reporting,
- This will also include interviews with key NJEDA personnel. The following is a preliminary listing of personnel and roles that may be included in our interviews:
 - COVID-19 Recovery Programs Accountability Officer
 - COVID-19 Recovery Programs Managers
 - Accounting and Finance Staff
 - Information Technology Specialists
 - Program Operations Personnel
- We will also benchmark the program and controls against regulatory frameworks and leading practices that grant recipients have generally found to be effective in preventing, detecting, and mitigating such risks.

4.1.3. Phase 3: Integrity Monitoring

OBJECTIVE

During this phase of work, K2-FIN will perform monitoring and testing of control operational effectiveness inclusive of transaction testing.

4.1.3.1. Key Work Steps

K2-FIN understands the importance of NJEDA's deadlines, and as such, will be nimble in its approach to conducting its tasks timely and efficiently. K2-FIN will begin the monitoring phase concurrently with the risk assessment phase, applying what we learn in the risk assessment to our monitoring. K2-FIN professionals will work closely with designated NJEDA personnel to coordinate and perform the following tasks to achieve the project objectives:

- Identification of high-risk areas subject to testing. Based on the risk and control assessment, K2-FIN will work with NJEDA to identify potential areas of focus of the transaction testing. This may include, but is not necessarily limited to, the following:
 - Grant management
 - Sub-recipient application processing, payment and monitoring
 - Procurement
 - Payments
 - Vendor on-boarding
 - Financial reporting and reimbursement
 - Reconciliation
- Perform substantive testing
 - For each high-risk category, K2-FIN will select a risk-based set of transaction for testing (e.g., large, round -dollar transactions with limited support or description)
 - This will also include inquiry, observations, and forensic analysis of books and records) to ensure that procedures and controls were executed based on program requirements.

- With respect to the sub-recipients, K2-FIN will request and review the list of sub-recipient grant applications received and select a risk-based sample for further testing including, but not limited to, the following:
 - Whether the applicant meet the eligibility requirements;
 - Assess adequacy of documentation provided by the sub-recipient as part of its application;
 - Review actual disbursement files to ensure that all planned disbursements agree with actual amounts as stated in the sub-recipient files; and,
 - Ensure that all appropriate supporting documentation was provided to support sub-recipient's use of funds.
- Identification of potential exceptions based on the transactions testing. This will include potential exceptions to established controls as well as potential indicators of fraud, waste, or abuse
- Conduct follow-up inquiry to obtain an understanding of the root cause of the exceptions
- Provide recommendations regarding control remediation

4.1.4. Phase 4: Reporting

OBJECTIVE

During this phase of work, K2-FIN will prepare required project deliverables.

4.1.4.1. Key Work Steps

K2-FIN professionals will work closely with designated NJEDA personnel to coordinate and perform the following tasks to achieve the project objectives:

- Provide status update reports
- Prepare interim draft deliverables
- Discuss deliverables with NJEDA stakeholders
- Finalize deliverables

The scope of work outlined in this proposal does not anticipate testing compliance at the sub-recipient level, including whether the funds were appropriately utilized by the sub-recipient. K2-FIN will work with the NJEDA to develop methodologies for such testing that could be performed in subsequent phases. Additionally, if as a result of the monitoring and testing, fraud or misconduct is identified, K2-FIN will report such matters immediately. K2-FIN will also discuss with key stakeholder the need for further investigation, the related scope of work and required budget. Additional work may include, but may not be necessarily limited to, intelligence gathering regarding sub-recipients, vendors, and site-visits to confirm sub-recipient application information and/or use of funds.

5. Anticipated Deliverables and Timeline

The following chart represents the anticipated deliverables and timeline, assuming K2-FIN starts on November 19, 2020:

Phases of Work	Anticipated Deliverables	Anticipated Delivery Date
Phase 1: Planning and scoping	<ul style="list-style-type: none"> Information request Detailed audit plan 	<ul style="list-style-type: none"> November 25, 2020
Phase 2: Risk and Control Assessment	<ul style="list-style-type: none"> Risk and Control Assessment Matrix 	<ul style="list-style-type: none"> Draft: December 15, 2020 Final: December 30, 2020
Phase 3: Integrity Monitoring	<ul style="list-style-type: none"> Exceptions identified and management response Recommendations for control enhancements 	<ul style="list-style-type: none"> On-going
Phase 4: Reporting	<ul style="list-style-type: none"> Draft IM Report Final IM Report 	<ul style="list-style-type: none"> Draft Quarterly IM Report: December 15, 2020 Final Quarterly IM Report: December 30, 2020

6. Our Team

At K2-FIN, we believe it's not just the machinery but the driver of the machinery that's important. That's what sets us apart. We have identified the key team members below to lead the project. We will also draw from our pool resources to support the team leads. The chart below describes the team structure of the key team members.



The following table provides a brief description of the key team member experience. Additional details can be found in the attached CVs.

Principal		
Name	Title	Key Experience
Paul Ryan	Senior Managing Director	<ul style="list-style-type: none"> Over 19 years' experience and specializes as an Integrity Monitor in developing programs, compliance reviews, investigations, fraud detection, and monitorships Former Deputy Inspector General where he had oversight over and strengthened government programs, including oversight of ARRA funds, and assisting with the development of operational efficiencies Assists clients with management strategies and policy development.

Program Manager		
Name	Title	Key Experience
Raymond Dookhie	Managing Director	<ul style="list-style-type: none"> CPA with more than 25 years of experience in compliance, integrity risk management, and investigations. Experience spans across the public and private sectors, with specific focus on public sector, financial services, life sciences, as well as real estate and construction. Manage large-scale compliance and integrity monitoring projects, financial fraud investigations, anti-bribery and anti-corruption compliance projects, and fraud and misconduct investigations and assist clients in addressing enterprise risk management priorities by designing, implementing, evaluating, and monitoring compliance programs.

Project Managers		
Name	Title	Key Experience
Scott Millman	Senior Director	<ul style="list-style-type: none"> Over two decades of experience in providing governance, risk, and compliance management consulting enabling public entities to build and sustain effective risk management and internal audit programs Lead teams in performing integrity monitoring services to focused to uncover fraud, waste, and abuse to support various state government agencies Involved in compliance review for large disaster recovery projects funded with Federal grants containing strict funding requirements
Yashvi Roy	Senior Director	<ul style="list-style-type: none"> Over seven years of experience in providing auditing and integrity monitoring services on large scale government funded projects Lead audit teams in performing risk assessments, constructing, and executing work plans, and working with client management to implement enhancements to controls and resolve audit issues Conduct audits designed to focus on uncovering fraud, waste, and abuse to support state government agencies

Engagement Staffing Pool	
Key Experience	
CPAs, Certified Fraud Examiners, and analysts	
<ul style="list-style-type: none"> • Significant experience conducting financial and operational audits, process management, financial controllership, and forensic accounting and investigation • Regularly conducts integrity monitoring compliance engagements and works with project teams and client management to make recommendations for enhancements of controls • Worked on compliance advisory engagements to assist with internal controls implementation financial and operational measurement and process improvement, contract management, Federal grant compliance and applications 	

7. Detailed Budget

Based on our understanding of NJEDA’s needs and proposed scope of work described above, K2-FIN anticipates that the project budget will \$124,880. Please refer to the table below for additional details.

Tasks	Principal	Program Manager	Project Manager	Supervisory Senior Consultant	Total
Rates	\$340	\$325	\$290	\$220	
Planning and information gathering	6	8	8	8	28
Inherent and Control Risk Assessment	6	20	40	40	104
Integrity Monitoring	6	20	70	70	144
Status update reporting and preparing deliverables	20	36	48	48	120
Total Hours	38	84	166	166	396
Total Cost	\$12,920	\$27,300	\$48,140	\$36,520	\$124,880



Snežana Gebauer

Executive Managing Director, Americas
New York



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Snežana Gebauer is executive managing director and head of the U.S. Investigations and Disputes practice. She is based in New York.

As a veteran corporate investigator, she has managed large-scale and high-profile corporate investigations focused on corruption and various types of fraud; pre and post transactional business intelligence and due diligence engagements for investment banks, hedge funds, and private equity funds; and investigations in support of high-stakes international legal disputes. Snežana's clients span Fortune 500 and FT 1000 companies, government agencies, leading law firms, and financial institutions. Over the course of her career she has lived and worked in New York, London, Washington, D.C., and São Paulo, leading project teams composed of consultants in different offices around the world, managed client relationships, and cultivated a network of contacts in law enforcement, government agencies, and within numerous industry groups in the United States, Europe, Asia, and Latin America.

Before joining K2 Intelligence Financial Integrity Network, Snežana served as managing director and São Paulo Office head for Kroll Associates, where she was responsible for all of Kroll's operations in Brazil. Prior to her roles at Kroll Associates, she served as a director for Altegrity, the parent company of Kroll Associates.

Snežana also spent seven years at Diligence, where she established the firm's New York office. She was responsible for the recruitment of key staff and the development and implementation of management and operations protocols and best practices. At Diligence, she managed complex and multijurisdictional investigations for multinational companies operating in emerging markets and also directed high-level strategic intelligence projects for investment funds and corporates around the world.

Snežana received her M.B.A. from George Washington University with a specialization in



international finance and her B.A., summa cum laude, Phi Beta Kappa, from Drake University. She also attended The American Institute on Political and Economic Systems at Georgetown University. She is fluent in five languages.

As an Executive Managing Director, Snežana oversees the project managers and teams on all engagements in the Investigations & Disputes practice, including all our integrity monitoring projects such as:

- New York Governor's Office of Storm Recovery
- State of New Jersey Department of Treasury Superstorm Sandy Integrity Monitoring Program
- NJ Transit Superstorm Sandy Recovery Engagements
- Metropolitan Transportation Authority
- Moynihan Train Hall
- Javits Center Expansion



Paul E. Ryan

Senior Managing Director
New York



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Paul E. Ryan is a senior managing director at K2 Intelligence Financial Integrity Network (K2-FIN), where he specializes in directing compliance reviews and developing programs, complex investigations, and monitorships. Clients facing a range of problems—from dealing with regulatory or contractual compliance-related issues to vendor fraud or conflicts of interests—turn to Paul to help them determine and implement a course of action. Working closely with clients, he conducts investigations, reviewing results and recommending increased controls and enhanced policies and procedures, and creates recovery plans as needed. Paul has vast experience developing and assessing compliance programs, including the determination of best practices for both public and private entities.

Paul currently leads the compliance monitoring of a major financial institution's capital construction program. In a recent investigation, he conducted a ground-breaking review of media transparency issues for the Association of National Advertisers (ANA).

Prior to joining K2-FIN, Paul served for 10 years at the New York State Office of the Inspector General (NYS OIG) and the New York County District Attorney's Office. He has extensive experience in the investigation and prosecution of complex fraud, corruption, and other crimes in the public and private sectors.

Paul served as the Assistant Deputy Inspector General and Director of the NYS OIG's Contract and Construction Fraud Unit, supervising multidisciplinary teams in complex investigations. As a member of the NYS OIG, Paul helped ensure ensured \$31 billion in ARRA funds allocated to New York were utilized with transparency and accountability as well as preventing fraud, waste, abuse and mismanagement.

At the New York County District Attorney's Office, Paul was an Assistant District Attorney in the Labor Racketeering Unit/Construction Industry Strike Force and the Trial Division.

Paul received his J.D. from the Benjamin N. Cardozo School of Law and his B.S. in political science from Queens College.



As a Senior Managing Director, Paul oversees the project managers and teams for our integrity monitoring engagements, including:

- New York Governor's Office of Storm Recovery
- State of New Jersey Department of Treasury Superstorm Sandy Integrity Monitoring Program
- NJ Transit Superstorm Sandy Recovery Engagements
- Metropolitan Transportation Authority
- Moynihan Train Hall
- Javits Center Expansion



Raymond Dookhie

Managing Director
New York



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Raymond Dookhie, a managing director in K2 Intelligence's Investigations and Disputes practice, has more than 25 years of experience in compliance, integrity risk management, and investigations. His experience spans across the public and private sectors, with specific focus on public sector integrity monitorships, financial services, life sciences, as well as real estate and construction. Ray helps clients address enterprise risk management priorities by designing, implementing, evaluating, and monitoring compliance programs. He manages compliance and integrity monitoring assignments, anti-bribery and anti-corruption compliance projects, compliance and integrity risk management, and fraud and misconduct investigations.

Prior to joining K2 Intelligence, Ray was a senior director with KPMG's forensic services practice in New York, where he served in various client-service leadership roles. During his 20-plus years with KPMG, Ray provided compliance and integrity risk management subject-matter expertise to large and small clients across a wide spectrum of compliance maturity.

Earlier in his career, Ray was a fraud investigator with the New York County District Attorney's Office and the New York City Department of Investigation.

Ray is a Certified Public Accountant (CPA), with a certification in financial forensics. He is a member of the New York State Society of Certified Public Accountants and the American Institute of Certified Public Accountants; an associate member of the Association of Certified Fraud Examiners; and a committee member of the Litigation Services Committee for the New York State Society of Certified Public Accountants.

Relevant Project Experience

Jacob K. Javits Convention Center

Ray is currently serving as the Integrity Monitor for the Jacob K. Javits Convention Center expansion project. In this capacity, Ray has oversight of the investigators, forensic accounts, integrity due diligence team, engineering team, as well as MWBE subcontractors assisting with the monitorship. Ray coordinates all aspects the integrity monitorship including, but not limited to, subcontractor vetting, on-site audits and inspections, auditing



of requisitions and change orders, reviewing of certified payrolls, monitoring MWBE compliance, as well as construction quality, safety, and security. Ray also coordinates with key project stakeholders including the NYS Empire Development Corporation, the Inspector General, the Project Managers, General Contractors, and subcontractors.

For further description of the project, start and end date, and corresponding contact information, please refer to Section 3.

Prior to joining K2, Ray has significant relevant experience in the areas of Integrity Monitorships, Grants Management, Antifraud and Controls, and Investigations as follows...

New Jersey Department of Treasury

Ray was the lead Financial Investigator for the Middlesex County Water Treatment Plant Integrity Monitorship. Specifically, Ray assisted the State of New Jersey with the implementation of its financial auditing, grant management, and integrity monitoring program in connection with Hurricane Sandy. This included an assessment of grant requirements and development of an auditing and monitoring program to ensure that the agency and its subcontractors were compliant and that there was no fraud waste or abuse. Specific program elements included, but were not limited to, validation of service delivery, quality of goods and service delivered, adequacy of documentation, and proper accounting.

Port Authority of New York and New Jersey and New York City School Construction Authority

Ray served as the Integrity Monitor for a contractor providing services at the World Trade Center Site and various school construction projects in New York City. Ray led all aspects of the project including, but not limited to, the performance of a fraud, waste, and abuse risk assessment, development of a fraud prevention program, ongoing monitoring activities, as well as conducting one-off investigations as needed. Ray worked closely with the PANYNJ and SCA IG's offices to successfully monitor the contractor activities through project completion.

Special Commissioner of Investigations for the New York City Department of Education

Ray worked with the Integrity Monitor to monitor the activities of several bus companies providing transportation services for the Office of Pupil Transportation. In this capacity Ray led all aspects of the project including, but not limited to, the development of a fraud prevention program, providing related training, perform ongoing monitoring activities



including spot checks, ride-along, auditing of books and records, as well as conducting one-off investigations as needed.

US Department of Justice, the New York County District Attorney's Office

Ray was the Lead Financial Investigator working with the court-appointed monitor in reviewing the financial activities for a major union and various companies within the painting, plumbing, construction, and private sanitation industries. In this capacity, Ray supervised the team performing the monitoring the day-to-day financial transactions to spot indicators of potential fraud, waste, abuse, and corruption.

Commonwealth of Massachusetts

Assisted the Commonwealth of Massachusetts with the development of its anti-fraud programs and controls in connection with distribution of federal grant funds from the American Recovery and Reinvestment Act. This included the design of an anti-fraud framework and related guidance that various agencies must implement to prevent, detect, and respond to fraud. This also included the development and delivery of awareness training for program stakeholders and agencies. Specific program elements included, but were not limited to, fraud risk assessment, code of conduct, whistleblower mechanisms, financial controls and documentation, auditing and monitoring protocols including the use data analytics and technology.

Other Relevant Experience Prior to Joining K2

Compliance and Integrity Risk Management

Assisted clients in their continuous efforts to enhance their internal control environment through the evaluation, design, and implementation of effective compliance programs and controls.

- Assisted a global not-for-profit organization with the design and implementation of an enterprise-wide risk management program with specific emphasis on anti-fraud programs and controls
- Evaluated anti-fraud programs and controls for a major construction equipment rental company
- Developed recommendations regarding key anti-fraud programs and controls for a major air cargo transportation company.
- Performed a fraud waste and abuse risk assessment for the port authority of New York and New Jersey in connection with the World Trade Center construction project



- Conducted fraud waste and abuse risk assessment for the State of New Jersey in connection with the Middlesex County Water Treatment Plant repairs following Super Storm Sandy
- Performed a fraud risk assessment for major government contractor in the Aerospace and Defense industry
- Assisted the State of New York Division of Housing and Community Renewal with design and implementation of anti-fraud programs and controls in connection with the set-up of its Tenant Protection Unit
- Assisted with the design and implementation of continuous auditing and monitoring programs for organizations in various industries including the public sector, leveraging data analytics to spot high-risk transactions.
- Conducted a procurement fraud risk assessment for one of the Nation's top watch manufacturer

Anti-bribery and Anti-Corruption

Provided anti-bribery and anti-corruption (ABAC) related expertise to clients in various industries. Specific areas of focus include ABAC due diligence, risk assessments, program gap analysis and program enhancement, investigations, third-party intermediary audits, and training program design and deployment.

- Assisted a global pharmaceutical company with the enhancement of its ABAC compliance program with emphasis on financial controls
- Performed ABAC due diligence for companies within various industries including consumer products, diversified industrial, and pharmaceutical
- Conducted a post-acquisition ABAC compliance assessment for a global investment bank
- Performed a third-party ABAC audit for global human resources management company
- Led an ABAC program gap analysis and program enhancement for a fortune 500 diversified financial services company
- Led a global ABAC program gap analysis and remediation for a top-tier investment bank in response to a regulatory inquiry
- Performed an ABAC risk assessment for a global financial institution



- Designed and delivered ABAC training for regional compliance officers at a Top-Tier financial institution
- Performed a gap analysis of the ABAC surveillance program for a global investment bank
- Led the implementation of an enhanced global ABC program for a Fortune 100 retailer in response to a regulatory investigation
- Designed an ABAC transaction monitoring program for a Fortune 100 retailer
- Conducted an ABAC program gap analysis for a leading global professional services company
- Performed an ABC Compliance Assessment for a distributor located in Russia
- Performed an ABC audit for an India-based subsidiary of an Industrial Manufacturing Client
- Conducted a third-party intermediary audit for a major airline
- Retained by the General Counsel of a global diversified industrial client to investigate allegations of employee misconduct including bribery and corruption payments in China
- Leveraged data analytics to spot indicators of potential fraud and misconduct in the procure-to-pay, travel and entertainment and other key business processes

Fraud and Misconduct Investigations

Investigated alleged fraud and misconduct including theft or misappropriation of assets, regulatory noncompliance, and fraudulent financial reporting.

- Worked with the New York County District Attorney's Office to provide forensic accounting expertise relating to several cases including medical mills and real estate and construction.
- Assisted the Audit Committee of a Global Manufacturing Company with the investigation of possible financial reporting concerns relating to accounting for income taxes.
- Retained by external counsel of a manufacturing client to assess possible revenue recognition concerns at a subsidiary company.



- Retained by the Audit Committee for a major janitorial services company to investigate concerns regarding possible revenue recognition issues and possible improper payments to secure customer contracts.
- Retained by the founding partners of a law Firm to conduct a forensic accounting analysis of possible financial reporting concerns by the former financial director
- Assisted the audit team for a biopharmaceutical company in investigating alleged management misconduct including override of financial controls
- Assisted the Audit Committee of a Global Manufacturing Company with the investigation of possible financial reporting concerns relating to accounting for income taxes.
- Retained by external counsel of a manufacturing client to assess possible revenue recognition concerns at a subsidiary company.
- Assisted the Audit Committee of a Major Pharmaceutical with the investigation of possible financial reporting concerns at an International subsidiary.
- Retained by Internal Audit and the Office of General Counsel for a major electronics company to conduct a dealer audit. My work resulted in the recovery of approximately \$21 million in fraudulent claims.
- Retained by the General Counsel of a Diversified Industrial Company with global operations to investigate various allegations of employee misconduct including theft, waste and abuse and receipt of kickback payments from a supplier. My work resulted in the recovery of approximately \$7 million.
- Retained by the General Counsel of a Diversified Industrial Company with global operations to investigate various allegations of employee misconduct including bribery and corruption payments, employee theft, waste and abuse and receipt of kickback payments from a supplier.



Yashvi Roy

Senior Director
New York



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Yashvi Roy is a senior director with K2 Intelligence Financial Integrity Network's (K2-FIN) **Investigation and Disputes** practice. As a certified fraud examiner, she specializes in financial and forensic investigations, compliance reviews, and integrity monitorships to identify fraud, waste, or abuse. Yashvi has created code of business ethics and standards of conduct presentations and conducted multiple training sessions of employees.

Prior to joining K2 Intelligence in 2017, Yashvi worked in two public accounting firms from 2013 through 2016, where she led financial statement audits of various clients primarily in the real estate and construction industry. Her clients consisted of large construction and development corporations, various U.S. Department of Housing and Urban Development Section 8 subsidized residential properties, and several multimillion-dollar commercial properties. She was responsible for assessing compliance with HUD regulations and Section 8 requirements. In addition, Yashvi reviewed tenant files to assess for fraud, waste, or abuse.

Yashvi received a B.S. in accounting from Pennsylvania State University. She is a Certified Fraud Examiner. In addition to English, Yashvi fluently converses in Hindi and Gujarati.

Relevant Project Experience

Jacob K. Javits Convention Center Expansion and Transformer Building Projects

Yashvi is the Forensic Accounting team lead on the Javits Expansion Project and the Transformer Building Project. Working on the projects since 2017, Yashvi conducts continuing internal control reviews and risk assessments to formulate and execute risk-focused audit plans. With a diverse knowledge of the project costs and the construction progress, Yashvi conducts project budget reconciliations, reviews of project costs for improper billings, prevailing wage compliance, and compliance with state and federal Minority, Women, and Disadvantaged Business Enterprises (M/W/DBE) program requirements.



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Additionally, working with a multi-disciplinary team, Yashvi conducts contract compliance reviews to ensure timely delivery of all contract deliverables and client requests regularly communicating with all project personnel.



Scott Millman

Senior Director
New York

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Scott Millman is a senior director in K2 Intelligence Financial Integrity Network's (K2-FIN) Investigations and Disputes practice, based in New York. Working with clients in both the public and private sectors, he handles complex forensic accounting projects focused on combating fraud, waste, and abuse issues. Scott also oversees integrity monitoring projects and helps clients evaluate and implement oversight programs by performing internal and external audits as well as risk assessments.

Before joining K2-FIN, Scott was a manager at CohnReznick, where he performed integrity oversight monitoring and compliance reviews to determine Community Development Block Grant Disaster Recovery (CDBG-DR) eligibility. He also gained expertise investigating prevailing wage discrepancies and performing financial audits of drawdowns and overhead rates relating to the Superstorm Sandy Funding process and repair work.

Scott has several years of diversified accounting experience with an extensive background in providing audit and accounting services to large banking and investment institutions.

Scott received his M.S. in accounting from Fairleigh Dickinson University, his M.B.A. in finance from Loyola College in Maryland, and his B.A. in political science from the University of Delaware.

Relevant Project Experience

New Jersey Department of Environmental Protection

Scott is a key member of the audit team in our integrity monitoring of two projects funded by grants received for the Rebuild by Design program. Scott reviews records for compliance with all Federal and state regulations, including but not limited to HUD CDBG-DR and prevailing wage. As a member of the team, he works with NJDEP personnel in making recommendations to better enhance controls, policies, and procedures on both projects.



Michael K. Bernstein

Director
New York

+1 917 243 7303 | michael@k2intelligence.com



Michael K. Bernstein is a director with K2 Intelligence Financial Integrity Network's (K2-FIN) Investigations and Disputes practice. With more than fifteen years of experience in public accounting, private finance and operational management, forensic accounting and fraud investigation, and risk management and advisory, he leads a variety of investigatory and advisory assignments for government, corporate, and high-net-worth individual clients.

Michael contributes to the protection of clients' financial, operational, and reputational interests through engagements that identify and investigate fraud, waste, and abuse; quantify losses and prepare evidence of allegations of financial crimes; and develop and improve internal controls and compliance programs to deter misappropriations. He has assessed the internal audit and internal controls programs of global banks on behalf of government regulators and has evaluated internal controls over federal grant management for major city disaster response and recovery efforts.

Michael started with K2-FIN as director of finance, providing financial and operational insight to inform key decisions that fueled the organization's growth.

Prior to joining K2-FIN, Michael served as the accounting manager of a fixed-base operator at Teterboro Airport, where, following the organization's purchase by Goldman Sachs, he built its accounting and finance department into one that provided timely, precise financial and operational reporting and insight. Michael began his career with Sobel & Co., LLC, a regional public accounting firm, where he managed a diverse range of audit, tax, and consulting clients in various sectors.

Michael received a B.S. in accounting and entrepreneurship from Hofstra University. He is a Certified Public Accountant, a Chartered Global Management Accountant, and a Certified Fraud Examiner. He serves as an active director on the New Jersey Society of CPAs Essex Chapter Executive Board and as a director on the Advisory Board of the Arc of Essex County.



Relevant Project Experience

New York City Transit Sandy Internal Controls for Grant Drawdown Process

Michael was a key team member on the assessment of the Metropolitan Transit Authority's procedures and internal controls over the use of FTA funds for Hurricane Sandy repairs and resilience. Between 2016 and 2017, Michael provided program-wide risk assessments; audited and mapped MTA processes over Federally funded capital project operations; and provided recommendation for improvements to the agency's internal controls framework.

World Trade Center Reconstruction

Michael served as a Forensic Accounting Director from 2016 and led Forensic Accounting efforts since 2018 on integrity monitorships of the Port Authority of New York & New Jersey's assets in the reconstruction of the World Trade Center before ultimately coordinating and advising on vendor contract closeouts and penalty assessments in 2019. Throughout his tenure on the engagement, Michael tracked and reviewed payment requisitions, change orders, claims, and other documents; reviewed procedures and internal controls within FTA framework and provided recommendations for policy clarifications; and determined proper bifurcation between federally and locally-funded work.

Integrity Oversight Monitorships of HNTB Corporation and BEM Systems, Inc.

Michael has served as the audit and forensic accounting lead on the Integrity Oversight Monitorships of Federally funded Hurricane Sandy-related recovery and repairs of NJ Transit assets by HNTB Corporation since 2018 and BEM Systems, Inc. since 2019. In this role, Michael has led teams to prepare project-wide risk assessments; review policy, procedures, and internal controls over disbursements and funding sources; review requisitions, change orders, and other accounting records; and review HNTB's involvement in preparation of and compliance with federal grants and development of recovery scope.



Naomi Gonzalez

Senior Forensic Accountant
New York



Naomi Gonzalez is a senior forensic accountant with K2 Intelligence Financial Integrity Network's (K2-FIN) **Investigation and Disputes** practice. As a certified fraud examiner, she specializes in financial and forensic investigations. Naomi assists in investigations related to fraud, waste, and abuse; conducts risk assessments; and reviews for compliance with contractual and regulatory requirements. She works with clients in the public and private sectors, including Fortune 500 banking and financial services institutions, government agencies, and various companies in New York's construction industry.

Prior to joining K2-FIN, Naomi was a senior associate at Marcum LLP, for 2 years, in its real estate practice. She conducted audits on multimillion-dollar real estate investment firms, including commercial, residential, and hotel properties. She assisted in all areas of the audit and was responsible for executing planning and performing analytics for audited financial statements, including performing fraud interviews, risk assessments, and internal control walkthroughs.

Naomi received a B.S. in accounting from Rutgers University. She is fluent in Spanish.

Relevant Project Experience

Jacob K. Javits Convention Center Expansion and Transformer Building Projects

Naomi conducts a project cost reconciliation for a billion-dollar project, analyzing all the costs incurred to date and outlining the pending and expected changes. Additionally, she conducts prevailing wage compliance reviews to assure that parties are meeting the requirements set forth in their contracts as well as other regulations set forth by the federal, state, and other local agencies.



Fortune 100 Global Financial Institution

Naomi reviews project costs to evaluate incurred costs against expected budgets, analyzes contractor and subcontractor invoices to identify and calculate improper billings, and assesses project payment applications to ensure compliance with contractual documentation.

Forensic Review

Naomi assists in conducting a forensic review of PPP loans, specifically comparing the fees received to actual payment made through review of agreements, income statements, loan reports, disbursement reports and revenue / cost reports. Additionally, Naomi reviews the misappropriated costs, unauthorized advances, and loan extensions to determine if any fraud, waste, or abuse exists.



Salvatore Ubaldini

Senior Forensic Accountant
New York



Salvatore Ubaldini is a senior forensic accountant in K2 Intelligence Financial Integrity Network's (K2-FIN) Investigations and Disputes practice. Part of the practice's U.S.-based forensic accounting team focusing predominantly on the construction and real estate industries, Salvatore works with clients—ranging from public agencies responsible for public infrastructure projects to large developers and owners working on large-scale construction and redesign endeavors—to monitor the integrity of construction projects. He conducts risk assessments and internal control reviews and performs audits pertaining to the appropriateness of contractor billings and regulatory compliance, as well as costs associated with labor, materials, and equipment.

With experience in both internal and external auditing for the private, public, and not-for-profit sectors, Salvatore specializes in the complexities of financial institutions as they pertain to regulatory compliance and professional standards. He interviews subject-matter experts; establishes risk control matrices; identifies, enhances, and tests internal controls; and prepares audit- and compliance-related reports.

Before joining K2-FIN, Salvatore was a senior internal auditor for BNB Bank, where he acted as an engagement leader on audits of the bank's \$4.9 billion balance sheet portfolio and was responsible for identifying variations to existing bank-approved processes based on audit procedures performed. In addition, he reviewed and reported on the bank's internal controls, regulatory documentation, and change management efforts.

Prior to his work with BNB Bank, Salvatore was a field auditor for Nassau County Comptroller's Office, where he worked on a wide range of engagements including prevailing wage reviews, vendor contract and billing reviews, public water department reviews, and being a fiscal monitor for the Sandy clean-up costs on Long Island. Such engagements led to the identification of large-dollar cost recoveries and various process efficiencies.



Salvatore started his professional career at NawrockiSmith, LLP, where he worked on both external and internal audit engagements as well as investigative and fraud-related cases within the tri-state area.

Salvatore is an active participant of the Molloy Alumni Board and an active Dominican Young Adult volunteer. Salvatore has recently been appointed to join the Dominican Youth Movement, USA (DYMUSA) board.

Salvatore received an M.S in accounting upon completing graduate studies at Hunter College, CUNY, and a B.S in accounting from Molloy College. He is a Certified Public Accountant (CPA) and a Certified Fraud Examiner (CFE).

Relevant Project Experience

Fortune 500 Global Financial Software and Media Company - Capital Operations Monitorships

Since March 2020, Salvatore has performed routine audits across multiple projects on invoices, change orders, and contractual agreements. Salvatore reviews for improper billings, compliance with stipulated labor and material rates, and compliance with Standard Operating Procedures. Sal assists on creating

Forensic Review

Salvatore assists in conducting a forensic review of PPP loans, specifically comparing the fees received to actual payment made through review of agreements, income statements, loan reports, disbursement reports and revenue / cost reports. Additionally, Salvatore reviews the misappropriated costs, unauthorized advances, and loan extensions to determine if any fraud, waste, or abuse exists.



Kyle Paul

Senior Forensic Accountant
New York



Kyle Paul is a senior forensic accountant with K2 Intelligence Financial Integrity Network's (K2-FIN) Investigation and Disputes practice. As a Certified Public Accountant and Certified Fraud Examiner, Kyle specializes in financial and forensic investigations and compliance reviews, with a focus on identifying fraud, waste, or abuse.

Kyle has experience in both internal accounting and external auditing, with a background in the complexities of trust accounting as it pertains to licensed attorneys. His experience also consists of interviewing persons of interest, reviewing internal controls, creating investigative plans, and preparing investigative summaries, as well as reviewing compliance-related matters.

Prior to joining K2-FIN, Kyle worked as an auditor and investigator for the State of New Jersey's Office of Attorney Ethics, where he was responsible for the audits and subsequent investigations of New Jersey-licensed attorneys.

Kyle received his B.S. from Towson University and completed graduate studies at Rider University in accounting, with a concentration in forensic accounting. He is a Certified Public Accountant (CPA) and a Certified Fraud Examiner (CFE).

Relevant Project Experience

New Jersey Transit

Kyle has also been involved in the NJ Transit BEM project, where he is responsible for invoice reviews. These reviews consist of extensive verification of hours billed, hourly rates, and reimbursement requests for both BEM and the subcontractors on this project. These reviews also include ensuring that fees and overhead have been appropriately billed.



Fortune 500 Global Financial Software and Media Company

Kyle has played an integral role in the monitorship of multiple construction monitorship projects for a global financial institution, including reviews of invoices, change orders, and procurement submissions. These reviews include, but are not limited to, ensuring that internal processes have been adequately followed, substantiating work complete, reviewing time and material billings, and verifying all relevant supporting documentation. Kyle began this project in August 2019 and continues it today.

Fortune 100 Global Financial Institution

Kyle has also played a role in the continued monitorship of a construction project for a global financial institution. In this capacity, Kyle is responsible for the review of monthly invoices; these include, but are not limited to, reviews of both direct and indirect costs, verifying amounts billed for fees, general conditions, building permits, and insurance, as well as reconciling lien waivers. Kyle began this project in January 2020 and continues it today.