

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: K2 Integrity
Quarter Ending: December 31, 2025
Expected Engagement End Date: December 31, 2026

A. General Info

1. Recovery Program Participant:

New Jersey Economic Development Authority ("NJEDA").

2. Federal Funding Source (e.g. CARES, HUD, FEMA, ARPA):

American Rescue Plan Act Funds, including both SSBCI and SLFRF (CSFRF/CLFRF).

3. State Funding Source (if applicable):

N/A.

4. Deadline for Use of State or Federal Funding by Recovery Program Participant:

SSBCI: 3/15/26 for \$79M received; 80% of 79M (first tranche) must be used by 3/15/26.
SLFRF: 12/31/26.

5. Accountability Officer:

Elizabeth George-Cheniara, Director of Legal Compliance.

6. Program(s) under Review/Subject to Engagement:

Risk Assessment.

7. Brief Description, Purpose, and Rationale of Integrity Monitor Project/Program:

The Monitor conducted a risk assessment covering State Small Business Credit Initiative and American Rescue Plan Coronavirus State and Local Fiscal Recovery Funds.

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8. Amount Allocated to Program(s) under Review:

SSBCI: up to \$255M; SLFRF: \$352M+

9. Amount Expended by Recovery Program Participant to Date on Program(s) under Review:

As of December 2025, SSBCI funds “committed” (excluding administrative expenses) comprised of the following:

- \$9,321,313.45 expended (Angel Match).
- \$1,142,546 expended (Life Science Fund).
- \$3,075,376.80 expended as of 12/15/2025. (NJ Capital Access Fund).
- \$10,500,000 expended as of 12/23/2025 (NJ CELs).
- \$131,783.35 as of 12/22/25 (Recovery Loan Loss Reserve).
- \$3,171,188.19 as of December 2025 noted in actual disbursements to date on CRM and \$14,473,690.53 as of September 2025 noted in amount balance on CRM for Products with a Closed and Closing Status (The Atlantic City Revitalization Program or “ACRP”).
- \$2,052,549.13 (The Atlantic City Food Security Grants Pilot Program or “ACFSGPP”).
- \$0 as of 12/18/25 (Urban Investment Fund Grant Program).
- \$11,293,585.50 as of December 2025 noted in current balance on CRM and \$28,173,685 as of December 2025 noted in amount balance on CRM for Products with a Closed and Closing Status. (A.R.T. Real Estate & Public Space Activation Program).
- \$69,781,987.44 as of December 18, 2025 (Child Care Facilities Improvement Program).
- \$22,247,168.64 (Sustain and Serve NJ).
- \$8,698,702.59 expended as of 12/15/2025 (New Jersey Maternal and Infant Health Project).
- \$12,471,849 is for planning, design, and construction of the Renaissance Plaza in Atlantic City. As of the Kickoff meeting, \$11million was used specifically for the property acquisition, which brings the total to \$23,471,849. (Property Assemblage).
- \$0 expended as of December 2025 (A.R.T. Support and Placemaking).
- \$0 expended as of December 2025 (Real Estate Gap Financing).
- \$3,905,298.70 expended as of December 2025 (University Hospital).

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10. Amount Provided to Other State or Local Entities:

N/A.

11. Completion Status of Program (e.g. planning phase, application review, post-payment):

The assignment covers numerous projects in various stages from planning to post-payment.

12. Completion Status of Integrity Monitor Engagement:

On-going.

B. Monitoring Activities

13. If FEMA funded, brief description of the status of the project worksheet and its support:

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

14. Description of the services provided to the Recovery Program Participant during the quarter (i.e. activities conducted, such as meetings, document review, staff training, etc.):

a) IM Response

NJEDA continues to expand programming by assigning Integrity Oversight Monitors to additional programs: Activation, Revitalization, and Transformation (A.R.T.) Support and Placemaking; University Hospital Study and Master Plan; Property Assemblage Fund; and Real Estate Gap Financing Grant. K2 Integrity met with NJEDA staff to have kick-off meetings for each of these programs to discuss the objectives of each program as well as expectations of monitorship. K2 Integrity

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also met with the NJ Clean Energy Loans (CLE) Program team on December 11, 2025 to conduct a process walkthrough meeting.

Monitor continues to assess risk in consideration of the oversight and management of all programs, to include recently implemented programs, under the purview of federal funding to ensure that program-wide progress reporting continues to be thoughtfully considered and that programs are generally well-monitored.

The Authority continued to assess risk and mitigation strategies in connection with the Monitor's risk assessment.

b) Recovery Program Participant Comments

N/A.

15. Description to confirm appropriate data/information has been provided by the Recovery Program Participant and description of activities taken to review the project/program:

a) IM Response

The Authority submitted to K2 Integrity supplemental documents in connection with the University Hospital Study and Master Plan and Property Assemblage Fund. The Authority also provided follow-up responses to K2 Integrity's inquiries from the NJ Clean Energy Loans walkthrough meeting and the Pre-Closing Presentation from the A.R.T. Support and Placemaking kickoff meeting.

The Authority has provided all requested policies and procedures. Additionally, the Authority staff is consistently available for discussion and demonstrate a commitment to the reduction of residual risk by being forthcoming and proactive with risk mitigation processes.

b) Recovery Program Participant Comments

N/A.

16. Description of quarterly auditing activities conducted to ensure procurement compliance with terms and conditions of contracts and agreements:

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a) IM Response

See response to Question 14.

b) Recovery Program Participant Comments

N/A.

17. If payment documentation in connection with the contract/program has been reviewed, provide description.

a) IM Response

The Monitor reviewed program specific policies and procedures and noted guidance on applicant selection, disbursements, loan servicing and monitoring as well as reporting, confirming the existence of key control activities regarding ethics and the financial management for awards.

b) Recovery Program Participant Comments

N/A.

18. Description of quarterly activity to prevent and detect waste, fraud, and/or abuse:

a) IM Response

See response to Question 14.

b) Recovery Program Participant Comments

N/A.

19. Details of any integrity issues/findings, including findings of waste, fraud, and/or abuse:

a) IM Response

None.

b) Recovery Program Participant Comments

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N/A.

20. Details of any other items of note that have occurred in the past quarter:

a) IM Response

None.

b) Recovery Program Participant Comments

N/A.

21. Details of any actions taken to remediate waste, fraud, and/or abuse noted in past quarters:

a) IM Response

N/A.

b) Recovery Program Participant Comments

N/A.

C. Miscellaneous

22. List of hours (by employee) and expenses incurred to perform quarterly integrity monitoring review:

a) IM Response

Bradley Sussman	0.00 hours, no expenses
Tejah Duckworth	0.00 hours, no expenses
Michael Bernstein	0.50 hours, no expenses
Bruce Archer	0.00 hours, no expenses
Michael Quevedo	0.00 hours, no expenses
Lucy Gonzales	0.00 hours, no expenses
Naomi Pena	0.00 hours, no expenses

b) Recovery Program Participant Comments

N/A.

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23. Add any item, issue, or comment not covered in previous sections but deemed pertinent to monitoring program:

a) IM Response

None.

b) Recovery Program Participant Comments

None.

Name of Integrity Monitor:

K2 Integrity

Name of Report Preparer:

Michael Bernstein

Signature:



Date:

12/31/2025