

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: Regis & Associates, PC
Quarter Ending: 9/30/2025
Expected Engagement End Date: 12/31/2026

A. General Info

1. Recovery Program Participant:

New Jersey Department of Treasury, Division of Property Management and Construction

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

ARPA

3. State Funding Source (if applicable):

N/A

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

December 31, 2026

5. Accountability Officer:

Mona Cartwright – Assistant Director, Treasury Fiscal

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

DPMC Project A1383-00, Richard Hughes Justice Complex building - Air Handler Units (AHU) Replacement

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

On July 17, 2020, Governor Murphy signed Executive Order 166 (E.O.166), which established the COVID-19 Compliance and Oversight Task Force (Taskforce) and the Governor's Disaster Recovery Office (GDRO).

**Integrity Monitor Report
Category 3**

Pursuant to E.O. 166, the Taskforce issued guidelines, which have been updated as of June 2021 and are attached hereto, regarding the appointment and responsibilities of COVID-19 Oversight Integrity Monitors (Integrity Monitors or IM). Integrity Monitors are intended to serve as an important part of the State's accountability infrastructure; while working with Using Agencies in developing measures to prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds. They also provide expertise in Program and Process Management Auditing, Financial Auditing and Grants Management, and Integrity Monitoring/Anti-Fraud services. An integrity monitor (Category 3: Integrity Monitoring/Anti-Fraud) is required for projects that receive \$20 million or more in COVID-19 Recovery Funds.

The Division of Property Management and Construction (DPMC) received \$25,200,000 from the ARPA State Fiscal Recovery Fund (SFRF), for DPMC Project A1383-00. This funding is allocated for the HVAC Replacement of 27 Air Handler Units, which benefit the 23,000 Agency Employees assigned to the R.J.H. Justice Complex at 25 Market Street in Trenton.

The purpose of the Integrity Monitoring Engagement is to work collaboratively with DPMC, to monitor the DPMC project, A1383-00, Justice AHU Replacement. The engagement includes:

1. Conducting a risk assessment of DPMC's existing controls in place to prevent fraud, waste, or abuse in connection with the COVID-19 Recovery Program;
2. Developing and submitting a Work Plan for monitoring the COVID-19 Recovery Program for fraud, waste, or abuse; including a review of relevant risk factors specific to the Program being monitored;
3. Performing program reviews; reviewing documents retention policies and procedures; performing fraud prevention/detection and data analytics; performing fraud awareness instruction for DPMC, contractors, and/or vendors; construction project monitoring reviews; procurement/expenditure reviews; and payment and wage reviews; and
4. Reviewing Compliance with applicable federal and state laws.

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

\$25,200,000 – ARPA SFRF

**Integrity Monitor Report
Category 3**

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

\$1,811,654.63 – ARPA SFRF

10. Amount Provided to Other State or Local Entities:

N/A

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

Design phase

12. Completion Status of Integrity Monitor Engagement:

In progress

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

The Integrity Monitor (IM) performed the following tasks, for the period from 7/1/2025 through 9/30/2025:

1. IM submitted final Q2 2025 Quarter report to the NJ Treasurer.

**Integrity Monitor Report
Category 3**

2. IM submitted the monthly reports on fraud prevention, waste, and abuse; for July and August 2025, to the NJ Treasurer: No fraud, waste, or abuse was noted.
3. During Q3, 2025, IM requested an update on the status of Project A1383-00 since the previous quarter's update, related to the following:
 - a. *Bid clearance*: The progress made in the compilation of bid documents, and any proposal requests.
 - b. *Expenditure*: IM also requested supporting documentation for expenditures (such as invoices or payment confirmations) related to the project.
 - c. *Total funding*: IM also followed up and requested an update on the status of total funding for the project (CWE), to determine whether the project funding shortfall had been addressed; including supporting documentation for any new funding sources for the shortfall (e.g., agreements, funding sources, etc.)
4. IM received notification that the construction contract has been awarded to the Albert M. Higley Company. Additionally, there was no change in the funding for the shortfall. IM reviewed the Contract/Financial Transaction Report as of September 30, 2025, which confirmed there were no transactions for the quarter.

b) Recovery Program Participant Comments

No Comment

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

IM inquired of the project team about the progress of the bid clearance, the compilation of bid documents, and whether the bid had been submitted to the Comptroller's Office, for approval. IM was informed that the construction project contract has been awarded to the Albert M. Higley Company. IM requested supporting documentation from the project team. IM will review the documentation upon receipt to ensure the contract was appropriately awarded and executed.

b) Recovery Program Participant Comments

**Integrity Monitor Report
Category 3**

No Comment

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

a) IM Response

As stated in response to Question 15 above, IM is currently awaiting the bid documents for the project, to assess whether the bid was awarded through a fair and open competitive bidding process.

b) Recovery Program Participant Comments

No Comment

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

a) IM Response

IM reviewed the Contract/Financial Transaction Report Treasury Fiscal, to ensure that payments were adequately supported and that there was proper review and approval.

IM noted that no payments were made during Q3, 2025.

b) Recovery Program Participant Comments

No Comment

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

a) IM Response

See the responses to Question 14.

b) Recovery Program Participant Comments

No comment

**Integrity Monitor Report
Category 3**

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

a) IM Response

No integrity issues/findings have been identified.

b) Recovery Program Participant Comments

No comment

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

a) IM Response

N/A

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

Total hours and employees for the period from 7/1/2025 through 9/30/2025 are as follows:

**Integrity Monitor Report
Category 3**

Staff Name	Position	Ongoing Monitoring	Risk Assessment	Workplan Development	Reporting	Total Hours
Gwendolyn Thomas-Regis	Partner				3.00	3.00
Edwin Kago	Senior Manager				0.50	0.50
Samson Estifanos	Audit Manager	0.50			0.00	0.50
Saidu Bangura	Senior Auditor	1.50			2.75	4.25
Grand Total		2.00			6.25	8.25

b) Recovery Program Participant Comments

No Comment

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

No comment

Name of Integrity Monitor: Regis & Associates, PC.

Name of Report Preparer: Regis & Associates, PC.

Signature: *Regis & Associates* [Sign Here]

Date: 9/30/2025