

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: K2 Integrity
Quarter Ending: September 30, 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 09/24/2025, SSBCI funds “committed” (excluding administrative expenses) comprised of the following:

- \$6,216,498.01 expended (Angel Match)
- \$20,000,000 obligated to two Fund Managers, \$213,750 expended (Life Science Fund).
- \$16,667,000 transferred, \$3,075,376.80 expended as of 9/24/2025. (NJ Capital Access Fund).
- \$10,500,000 expended (NJ CELs)
- \$5,000,000 obligated for the 2 CDFIs for a total of \$91,783.35 funds obligated for four transactions split among them (Recovery Loan Loss Reserve).

As of 09/30/2025, SLFRF funds “committed” (excluding administrative expenses) comprised of the following:

- \$2,409,095.84 as of September 2025 noted in current balance on CRM and \$9,151,103.03 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 (Urban Investment Fund Grant Program)
- \$9,507,835 as of September 2025 noted in current balance on CRM and \$28,173,684.99 as of September 2025 noted in amount balance on CRM for Products with a Closed and Closing Status. (A.R.T. Real Estate & Public Space Activation Program)
- \$55,538,841 (Child Care Facilities Improvement Program)
- \$22,247,168.64 (Sustain and Serve NJ)
- \$8,698,702.59 expended as of 9/15/2025 for direct program costs and 3rd party costs (New Jersey Maternal and Infant Health Project)

10. Amount Provided to Other State or Local Entities:

N/A.

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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: Clean Energy Loans, Blended Capital (Capital Access) Program, Maternal Infant Health Center project, Recovery Loss Reserve Program, and Life Science Investment Program. K2 Integrity met with NJEDA staff to have kick-off meetings for all these programs to discuss the objectives of each program as well as expectations of monitorship.

As these additional programs funded by American Rescue Plan State and Local Fiscal Recovery Fund (SLFRF) fund are established, the

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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.

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 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:

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

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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

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.

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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	0.25 hours, no expenses
Bruce Archer	11.75 hours, no expenses
Michael Quevedo	0.00 hours, no expenses
Lucy Gonzales	0.00 hours, no expenses
Naomi Pena	4.75 hours, no expenses

b) Recovery Program Participant Comments

N/A.

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.

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Name of Integrity Monitor: K2 Integrity
Name of Report Preparer: Tejah Duckworth
Signature: 
Date: 09/30/2025