

**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 State and Local Fiscal Recovery Funds (“ARP SLFRF”).

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:

Elizabeth George-Cheniara, Director Legal Compliance.

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

Urban Investment Fund Grant (“UIFG”) Program.

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

The Urban Investment Fund Grant (UIFG) Program is an initiative administered by NJEDA and funded through the ARP SLFRF. It is designed to support revitalization strategies in distressed urban municipalities by funding real estate projects that enhance commercial corridors. The program’s purpose is to stimulate economic recovery in areas impacted by the COVID-19 pandemic by increasing foot traffic, commercial activity, and equitable development. It targets underutilized or vacant properties

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and public spaces to transform them into vibrant, mixed-use, 24-hour economic centers. The rationale behind the program is to address the economic disruptions caused by remote work trends and reduced in-person commerce, ensuring that federal recovery funds are used effectively and in compliance with regulatory deadlines, with all projects to be completed by December 31, 2026.

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

\$38,198,148.00

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

\$0 as of September 2025

10. Amount Provided to Other State or Local Entities:

N/A.

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

As of September 2025, the board has approved awards to all six eligible applicants. These include: 1) City of Paterson 2) City of Passaic 3) City of New Brunswick 4) City of Trenton 5) Invest Newark (for City of Newark) and 6) Cooper's Ferry Development Association/Camden Community Partnership, LLC (for City of Camden)

The program is funded with ~\$38 million from ARP SIFRF, and is structured as a pilot initiative.

The Project Completion date must not extend beyond December 31, 2026, unless the Grantee continues work on the Project by utilizing funding that originates from sources other than the Grant Award, in which case the Project Completion date will be no later than December 31, 2027.

12. Completion Status of Integrity Monitor Engagement:

On-going.

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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 Monitor reviewed CRM for sub-recipient grant applications and selected a risk-based sample using both random and judgmental sampling to ensure adequate coverage and identify potential red flags.

In separate task orders, the Monitor notes that the NJEDA staff updated key policies within the last year, as well as underwent organizational changes. The Monitor reviewed the updated organizational chart, policies and procedures, as well as documentation related to applicant evaluation and program funding allocation processes. Additionally, the Monitor gained an understanding of the implemented risk mitigation measures concerning program administration, applicant selection, funding allocations, and evaluation criteria to ensure fairness and compliance with regulatory guidelines. This understanding, coupled with the Monitor's review of reporting documentation, indicates that program-wide progress reporting has been thoughtfully considered and that programs are generally well-monitored.

b) Recovery Program Participant Comments

N/A.

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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

See response to Question 14.

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

N/A.

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

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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.

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

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Bradley Sussman	0.00 hours, no expenses
Tejah Duckworth	0.00 hours, no expenses
Michael Bernstein	0.50 hours, no expenses
Naomi Pena	6.00 hours, no expenses
Michael Quevedo	0.00 hours, no expenses
Lucy Gonzales	0.00 hours, no expenses
Bruce Archer	0.00 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.

Name of Integrity Monitor:

K2 Integrity

Name of Report Preparer:

Tejah Duckworth



Signature:

Date:

09/30/2025