



October 31, 2025

Mr. Bradley Sussman  
Managing Director  
K2 Integrity  
730 Third Avenue  
New York, NY 10017

*VIA EMAIL ONLY:* [bsussman@k2integrity.com](mailto:bsussman@k2integrity.com)

**RE: NOTICE OF AWARD: RFP #2022-RFP-144-017 Integrity Oversight Monitor  
A.R.T. Phase II – Support & Placemaking Program**

Dear Mr. Sussman,

Thank you for your response to the Task Order Request for the above referenced program. K2 Integrity has been awarded this monitorship work with a total budget not-to-exceed \$93,290 for the duration of the monitorship, including compliance work and related tasks.

We will schedule a kickoff meeting with the A.R.T. Phase II team as soon as possible. NJEDA continues to look forward to working with K2 Integrity during its monitorship.

Sincerely,

*Elizabeth George-Cheniara*

[REDACTED]  
Director, Legal Compliance  
Accountability Officer

cc: [REDACTED], Chief Counsel  
[REDACTED], Chief Compliance Officer  
[REDACTED], Team Lead, Legal Compliance  
2022-RFP-144-017

**NEW JERSEY ECONOMIC DEVELOPMENT AUTHORITY TASK  
ORDER REQUEST**

[Reference RFP #2022-RFP-144-17]

<b>VENDOR NAME</b>	K2 Integrity
<b>PROJECT TITLE</b>	Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Support & Placemaking Program
<b>DATE</b>	9/5/2025
<b>PROJECT SUMMARY</b>	Integrity Monitoring Services
<b>DATE NEEDED</b>	ASAP

<b>NJEDA CONTACT</b> (Name, Title, Address, E-mail & Telephone Number)	<p><b><u>Activation, Revitalization, and Transformation (A.R.T.) Program Phase II - Support &amp; Placemaking Program questions:</u></b></p> <p>██████████ Assistant Director Strategic Initiatives, Community Development &amp; Strategic Initiatives ██████████</p> <p><b><u>For general IOM program questions:</u></b> ██████████, Director – Legal Compliance and Accountability Officer ██████████</p>
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**Cost Submission:** Please provide a cost estimate for the above referenced project, in accordance with the Fee Schedule submitted for RFP #2022-RFP-144-17– Integrity Oversight Monitor. By providing a cost estimate, the Vendor is certifying that there is no Conflict of Interest with the subject request. By the date listed in the cover letter issuing this TOR, the Vendor shall e-mail the New Jersey Economic Development Authority (NJEDA) a TOR Vendor Response Form provided by the NJEDA. Each estimate must include a Not-to-Exceed amount and statement.

**WRITTEN NOTICE TO PROCEED MUST BE PROVIDED BY THE AUTHORITY BEFORE WORK  
ON THIS PROJECT MAY BEGIN.**

**PROJECT DESCRIPTION**

For all COVID-19 Recovery Programs valued at \$20 million or more, the Engagement/Task Order Requests (TOR) will be provided to the Primary and Secondary contractors. Their responses will be evaluated and awarded accordingly and should include pricing. For all other programs under \$20 million, the TOR will be first provided to the Primary Contractor. If there is a conflict with the Primary Contractor, the task order will be provided to the Secondary Contractor. This TOR is for **Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Support & Placemaking Program (A.R.T. Program – Phase II)**, which is a competitive program funded with \$15 million by the American Rescue Plan (ARP) and Local Fiscal Recovery Funds (SLFRF).

Pursuant to RFP section 3.3.1, the awardee of this Task Order is requested to perform integrity monitoring services for the above referenced ART Support and Placemaking, in accordance with the requirements of the RFP, addenda, Executive Order 166 (Murphy, 2020), the COVID-19 Compliance Plan (Feb. 2022) and the Integrity Monitor Guidelines (June 2021). The awardee must provide quarterly and other reports in accordance with RFP section 3.3.2 utilizing the template attached to the RFP (and available online at <https://nj.gov/comptroller/doc/Integrity%20Monitor%20Report%20Template%20-%20Category%203.docx>). The awardee will work with the NJEDA's Accountability Officer and other NJEDA staff to monitor the above referenced A.R.T. Program Phase II.

## **Program Background**

The American Rescue Plan (ARP), signed into law by President Joe Biden on March 11, 2021, is a \$1.9 trillion economic stimulus bill designed to rebuild and restart the American economy in the wake of the Coronavirus (COVID-19) public health emergency by investing in families, communities, and small businesses. Through the Coronavirus State and Local Fiscal Recovery Funds (SLFRF), the ARP delivers \$350 billion to state, local, and tribal governments to support their response to, and recovery from COVID-19.

The Activation Revitalization and Transformation (A.R.T.) Program, from which the A.R.T. Program – Phase II was created, was initially divided into real estate and public space activation products with an appropriation of \$7M for real estate projects and \$3M for public space activation for a total program capitalization of \$10M. That original A.R.T. program launched in June of 2023 and received significant public interest. Seventeen (17) public space applications and Twenty-four (24) real estate applications were submitted for consideration.

The A.R.T Program – Phase II is a competitive grant program to catalyze community placemaking efforts through the creation of public space activation initiatives, as described below, by leveraging New Jersey’s arts and cultural sector as a creative force for change, specifically in downtowns of select municipalities. Downtowns and commercial corridors play a vital role in both urban and rural geographies, serving as economic engines for communities by empowering entrepreneurs, creating cultural hubs, and building community wealth. This Program will aid in the recovery and continue to mitigate the economic impact of the COVID-19 pandemic of these communities through arts and culture-focused placemaking efforts creating job-sustaining revenue for New Jersey’s Main Streets and communities by driving foot traffic to New Jersey’s most depleted commercial corridors.

NJEDA received an additional \$15 million to support this A.R.T. Program – Phase II program, which focuses on the Public Space Activation Grant Product and the economic recovery of the downtowns in these corridors to support placemaking efforts through arts and culture. The funds listed as, “Arts Support and Place making Grant Program,” allocated in the FY 2023 Appropriations Act will be transferred to the Authority; the funds will be assigned to the Economic Recovery Fund. The assignment of funds to the Economic Recovery Fund will allow the Authority to authorize a grant program as listed under N.J.S.A § 34:1B-7.13(a)(13) for the purposes of meeting stated economic priorities as identified by the Board on December 8, 2021. The funds will support place making activities that invest in communities to build resilient towns, and infrastructure statewide.

On May 8, 2024, the NJEDA Board approved:

- The utilization of \$15 million in appropriated federal funding from the ARP through the Fiscal Year 2023 Budget Appropriations Act (P.L. 2022, c.49) identified as Arts Support and Placemaking to fund a second round of awards for the A.R.T. Program Phase II;
- Product revisions for the A.R.T pilot program;
- Delegated authority to the NJEDA Chief Executive Officer to enter a Memorandum of Understanding (MOU) with the New Jersey Department of Community Affairs (DCA) whereby the NJEDA CEO will accept \$15M in funds from the ARP Coronavirus State and Local Fiscal Recovery Funds (SLFRF) and agree to comply with federal requirements for use of the funds. Delegation to the Authority’s CEO to decline individual applications for non-discretionary reasons for the A.R.T Program in accordance with the terms set forth in the attached product specifications.
- Utilization of an additional \$375,000 for the Authority’s administrative fees associated with operating this program.

The A.R.T. Program – Phase II was designed to help revitalize commercial corridors that were negatively impacted by reduced commuter traffic due to COVID. The loss of vital customer traffic during the pandemic impacted all of New Jersey, but especially those municipalities with major transit hubs. This program originally aimed to proactively address those economic impacts by investing in projects that would attract residents and talent, enable business creation, and build amenities that enhance downtowns. The A.R.T. Program Phase II as revised aimed to replicate the first launch of the A.R.T. Program, which was focused only in Atlantic City and Newark, to an expanded eligibility area throughout New Jersey.

The intention of this program is to support nonprofit organizations with a 501c (3), 501c (6), or 501c (19) status that will support the creation of public space activation initiatives, such as placemaking projects, public art installations, and arts-based projects. These activities may include, but are not limited to art exhibitions, performances, festivals, parades, concerts or concert series, film and video screenings, and cultural programming. This multi-faceted and strategic approach will hopefully continue to mitigate the economic impact of the COVID-19 pandemic by supporting the development and recovery of New Jersey's commercial corridors and invigorate community focused arts and cultural organizations. Projects were required to demonstrate how the proposed expenditure will mitigate the impact of COVID-19 in the municipality and support the economic resilience and vitality of the commercial corridor.

On August 23, 2025, the NJEDA Board approved:

- Thirty-nine (39) awardees identified in Exhibit A for a total of \$15 million and;
- In the event of an awardee withdrawal, delegated authority was provided to the Chief Executive Officer to award the next highest scored applicant that was not awarded due to non-discretionary reasons in the scored-ranking order.

### **Funding**

The Program utilizes \$15 million in appropriated funding from the ARP through the Fiscal Year 2023 Budget Appropriations Act (P.L. 2022, c.49) identified as Arts Support and Placemaking to fund a second round of awards for the A.R.T. Program Phase II – Public Space Activation Product. An additional \$375,000 (2.5% of the \$15 million budget appropriation) for the Authority's administrative fees will be used for operating the Program.

### **For ease of review the following is from the attached 5/8/2024 Board Memorandum:**

#### **Eligible Applicants**

Eligible applicants are nonprofit organizations with a 501c (3), 501c (6), or 501c (19) status. Municipalities, governments, and for-profit entities are not eligible to apply, although State institutions of higher education that are one of the eligible nonprofit organization categories are eligible. Any Applicant that received a grant from Phase I of the A.R.T. program is ineligible for Phase II of the Program. Applications are limited to one application per EIN.

Applicants must be in substantial good standing with the New Jersey Department of Labor and Workforce Development, New Jersey Department of Environmental Protection, and NJEDA Protection (as defined by both Departments), and not be in default with other NJEDA financial assistance, prior to approval. The Program required Applicants to provide a current tax clearance certificate at time of application to demonstrate substantial good standing with the New Jersey Division of Taxation. All projects are subject to compliance with the Authority's prevailing wage and affirmative action requirements and the Public Works Contractor Registration Act (N.J.S.A. 34:11-56.48 et seq.), which requires all contractors, subcontractors, or lower tier subcontractors (including subcontractors listed in bid proposal) who bid on or engage in the performance of any public work in New Jersey to register with the NJ Department of Labor and Workforce Development.

Applicants will self-certify, at time of application, the project meets the following federal eligibility considerations:

- **COVID Impact:** Applicants must address how the proposal is responsive to the negative public health and/or economic impacts of the COVID-19 pandemic and how it complies with all the ARP program requirements;
- **Capacity:** The applicant must have experience implementing a minimum of one project that is similar to the project being proposed;
- **Long-term impact:** Competitive applicants must articulate via the application process how the proposal will have a positive long-term impact in its community and the overall benefit to the community at large;
- **Financial Viability:** Must demonstrate long-term financial viability of the project and evidence that the project will be completed prior to 12/31/26;
- **U.S. Treasury reporting:** Ability (if applicable or requested by US Treasury) to provide the U.S. Department of Treasury with relevant reporting for all project expenditures exceeding \$1; specifically, all proposals must provide a narrative on how the project will address the impacts of COVID-19 in their municipality and why this capital expenditure is the most appropriate to address the economic harms caused by COVID.

Applicants cannot have received state or federal funding to support a similar expense identified in the project costs at time of application and will have to submit a Duplications of Benefits certification at time of application. Approval will be contingent upon a cost reasonableness analysis that will be reviewed prior to approval and disbursement.

### **Eligible Project Uses and Restrictions**

The A.R.T. Program Phase II Program supports the creation of public space activation initiatives, such as placemaking projects, public art installations, and arts-based projects which include, but are not limited to art exhibitions, performances, festivals, parades, concerts or concert series, film and video screenings, and cultural programming. Funding can also be granted to support operational costs for the applicant to execute art or placemaking projects.

Ineligible project activities may include, but are not limited to, acquisition costs of real estate, leases for real estate with expiration dates past December 31, 2026, incubator space, and real estate construction. Also, major infrastructure improvements are ineligible, such as capital expenditures including but not limited to sewer, wastewater, electrical grid, road paving, drinking water systems, and structures that are intended to remain in place after December 31, 2026, including demolition to create vacant land.

All applicants must submit a Source and Use analysis on the application's Source & Use Form. The line items in the Source section must list all sources of project funding including the funds requested in the EDA A.R.T. Program Phase II grant application. If the amount requested on the EDA A.R.T. Program Phase II Grant application is not listed as a Source, or if the Total Sources do not equal the Total Uses, then the Source & Use document will be considered incomplete, and the application will receive a non-discretionary declination.

### **Eligible Project Locations**

The Project location must meet the following criteria:

1. Projects must be in a commercial corridor defined for this program as being in either: a municipality designated as a "Target Urban Municipality," by the Housing and Mortgage Finance Agency, or designated as a Neighborhood Preservation Program (NPP) Eligible Municipality by the DCA, or a municipality with a designated Department of Transportation "Transit Village".
2. Projects must be in a municipality ranked in the Top 25% of the DCA 2023 Municipal Revitalization Index.
3. Projects must be located within 1.5 miles of an active New Jersey Transit, PATCO, PATH, or SEPTA passenger rail or light rail station operating in the same municipality that meets above criteria. (Locations are based on DCA geographic information systems passenger rail station point data.)

The 31 municipalities with areas eligible for the program are: Asbury Park, Bayonne, Belleville, Burlington City, Camden, City of Orange, Clifton, Dover, Dunellen, East Orange, Egg Harbor City, Elizabeth, Garfield, Hackensack, Hammonton, Jersey City, Linden, Lindenwold, Long Branch, Netcong, New Brunswick, North Bergen, Passaic, Paterson, Pennsauken, Perth Amboy, Plainfield, Rahway, Riverside, Trenton, and Union City.

Note: Atlantic City and Newark are municipalities that also meet the above location eligibility criteria. However, both cities are ineligible for this phase of the program due to additional funding each city received from the first round of this program, including other FY24 budget appropriations that each city has received through the Urban Investment Fund and the Atlantic City Revitalization Grant Program.

### **Grant Amounts**

The minimum grant award for the program is \$100,000 and the maximum grant award is \$500,000.

Staff will allocate funds to applicants based on the scored ranking in the full dollar amount requested. This process will continue, in descending order of the application scores, always allocating the full dollar amount requested, until all program funds have been exhausted.

If there are remaining applicants who cannot be funded at the full dollar amount requested, but have reached the minimum score of 65, NJEDA staff will notify the applicants in the descending order of their scores and specify the amount of project funds that are available. These applicants will have 15 business days from the date of notification by the Authority to both (1) accept the amount of funds available and (2) provide proof of an additional funding source to complete the proposed project budget. Proof can be provided in the form of a Letter of Intent, commitment letter, or bank statements. If the applicant decides not to accept the amount available or does not identify additional funding to complete the project, the application will be incomplete and deemed withdrawn by NJEDA.

### **Grant Funding Disbursements**

Under the Program, the applicant will receive the full grant disbursement upon execution of the Grant Agreement. The Authority will disburse funding only to the approved eligible applicant.

After the execution of the Grant Agreement, applicants will be required to submit quarterly reports until the project is completed. NJEDA will provide the applicant with a template that will include documentation indicating proper use of funds. The quarterly reports must include the summary of funds expended to date, a narrative detailing milestone(s) achieved and overall progress of the project, and proof of prevailing wage/ Affirmative Action compliance.

The applicant is responsible for assuring compliance of the project with all terms and conditions of the application and the Program funding requirements. The Authority reserves the right to recapture any grant funds used for ineligible purposes.

This Engagement/TOR shall run from the effective date until A.R.T. Program Phase II has disbursed all funding and completed any post-award compliance work.

### **Documents Attached**

- Board Memo re: Activation, Revitalization, and Transformation (A.R.T.) Program Phase II- Public Space Activation Product (5.8.2024)
- Board Memo re: Award and Declination of Applicants for the Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Public Space Activation Grant Product (8.18.2025)

**Applicants/Awardees for this program are identified in the list appended to this TOR.**

### **Deliverables**

- **Quarterly Reports**

Integrity Monitors (IMs) shall submit draft quarterly reports to the NJEDA **five (5) business days** before the last day of the quarter detailing the specific services rendered during that quarter and any findings of waste, fraud, or abuse in accordance with the report templates found on OSC's website. The draft quarterly report is submitted to the NJEDA with a copy to the Integrity Monitoring mailbox: [TreasuryIM@treas.nj.gov](mailto:TreasuryIM@treas.nj.gov).

Prior to the posting of a quarterly report that contains findings of waste, fraud, or abuse, the NJEDA shall be permitted to respond to the findings and have that response included in the publicly posted report. This will allow the NJEDA to highlight any course corrections from the finding, or to contest any finding that it contends is inappropriate. An NJEDA response is due within fifteen (15) business days after receipt of a draft quarterly report. Fifteen (15) business days after the quarter-end, the IM will deliver its final quarterly report, inclusive of any comments from the NJEDA, to [TreasuryIM@treas.nj.gov](mailto:TreasuryIM@treas.nj.gov) for distribution to the NJ State Treasurer, the New Jersey Governor's Disaster Recovery Office (GDRO), the NJ Senate President, the Speaker of the NJ General Assembly, the NJ Attorney General and the NJ OSC.

The IM quarterly reports will be posted on the GDRO transparency website pursuant to Executive Order 166. The topics covered by the quarterly report should include the information included in the templates downloadable from NJ Office of the State Comptroller (OSC) website ([New Jersey Governor's Disaster Recovery Office \(GDRO\) – COVID-19 Oversight \(nj.gov\)](#)).

- **Additional Reports**

IMs must promptly prepare responses for OSC inquiries. OSC, GDRO and the State Treasurer may request that IMs prepare additional reports or prepare additional memoranda that will assist OSC in evaluating whether there is waste, fraud, or abuse in COVID-19 recovery programs administered by Recovery Plan Participants. OSC may also request that IMs or Recovery Program Participants share corrective action plans prepared by Recovery Plan Participants to address reported deficiencies and to evaluate whether those corrective plans have been successfully implemented.

IMs are required to follow the Method of Operation for the Task Order Competition Process previously provided, with the following modification on time to submit:

- i. Immediately, **but by no later than three (3) business days** of the IM's receipt of the TOR, the IM must advise NJEDA of any conflicts of interest.
- ii. Within **14 calendar days** of the IM's receipt of the TOR, the IM must return a signed **Conflict of Interest Certification Statement (RFP Exhibit B2)** to [REDACTED], *whether or not a conflict exists.*

The IM must ensure that all pricing reflects itemized costs for all activities required for the Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Public Space Activation Product, including the “not-to-exceed” (NTE) pricing for: (a) all services within the year, *and* (b) for any additional necessary services that would exceed one (1) year. **The TOR response MUST include the NTE for the total cost of services for all applications and other IOM review criteria, as applicable, for the full duration of the project.** Pricing for all IOM services under this TOR associated with the Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Support & Placemaking Program must be listed in the TOR response (i.e., “additional [applications/services] beyond the number quoted will be priced at the rate of [dollar amount] per [time/unit] through the end of the program, with an increase in the cost NTE CPI per annum.”).

- The pricing will be evaluated based upon **the entirety** of the duration of the engagement and the proposal is to provide for this period. **ANY LIMITATIONS OR CAVEATS (SUCH AS LIMITING PRICING QUOTES OR SERVICES TO A SELF-SPECIFIED PERIOD OF TIME, i.e. ONE YEAR) SUBMITTED WITH THE PRICING SHALL BE REJECTED AND RENDER THE SUBMISSION NONRESPONSIVE.**

**Any adjustments to hours or positions/titles (i.e. substituting a subcontractor or staff employee) are subject to the final approval of the Authority’s Designated Contract Manager, at his/her sole discretion.**

ADDITIONAL PARTIES TO RELY ON THE RESPONSE

NEW JERSEY ECONOMIC DEVELOPMENT AUTHORITY  
TASK ORDER REQUEST  
CONFLICT OF INTEREST CERTIFICATION STATEMENT  
[Reference RFP #2022-RFP-144 (TOR-17)]

I hereby certify that I am an authorized representative of the Vendor and can provide this Conflict of Interest Certification Statement on the Vendor's behalf.

I hereby certify and attest that to the best of my knowledge that the Vendor does not have a direct, familial, personal or monetary interest in the business entity, business site or project indicated below; nor does the Vendor or any employee, agent and/or representative of the Vendor currently have or have had any previous or existing personal or professional relationships with, interaction with, or done business with the project-specific business, site and/or with the current or previous owner(s). Further, neither Vendor nor any employee, agent and/or representative of the Vendor is now or has been employed by, or is a principal of, or is affiliated with the respective business, business sites, owner(s) or project involved with the Task Order Request (TOR) named below, in any manner.

To the best of my knowledge, neither the Vendor or any employee, agent or representative of the Vendor hold any ownership interest in the respective Task Order Request businesses or business sites which are the subject of the work to be performed, nor does Vendor under contract (other than the Authority Contract) to perform work or services, including representation for the same businesses or business sites referenced in the Task Order Request for the work to be performed.

During the performance of the work for the Task Order Request, should a conflict of interest arise, whether real or perceived, Vendor will immediately notify the New Jersey Economic Development Authority's Designated Contract Manager of the conflict and await the Authority's review and decision regarding Vendor's further participation.

I understand that, should a conflict exist, whether real or perceived, in the sole discretion of the Authority, Vendor shall immediately recuse itself from the work to be performed. In the event Vendor declines to complete and execute this Conflict of Interest Statement, Vendor understands that it will be removed from the work.

**TASK ORDER REQUEST DETAILS:**

2022-RFP-144 (TOR-17)  
RFP #

ART Support & Placemaking Program - Phase II  
RFP Title

- Vendor hereby certifies and attests that, to the best of my knowledge, there is no conflict of interest, as indicated above, that would affect Vendor's ability to accurately, effectively and impartially perform the work required on the specific Task Order Request.
- Vendor hereby recuses itself from participating in the performance of any work required on the specific Task Order Request for the following reasons:

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Bradley Sussman \_\_\_\_\_  
Vendor Employee Name

  
Vendor Employee Signature

\_\_\_\_\_  
Vendor Contract Manager Name

\_\_\_\_\_  
Vendor Contract Manager Signature

Sr. Managing Director \_\_\_\_\_  
Title

10/02/2025  
Date

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date



INTEGRITY MONITORING

# K2 Integrity - Bid Submission-2022-RFP-144 – Integrity Oversight Monitor:

## Task Order Request – Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Support & Placemaking Program

**Prepared for:**

New Jersey Economic Development Authority

**Attention:**



Assistant Director

New Jersey Economic Development Authority

36 West State Street

P.O. Box 990

Trenton, NJ 08625-0990

September 23, 2025

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# 1. Management Overview and Technical Approach

## 1.1. Introduction

K2 Integrity, operating through K2 Intelligence, LLC (referred to herein as “K2 Integrity”) appreciates the opportunity to submit a proposal to the New Jersey Economic Development Authority (“EDA” or “the Authority”) to provide Integrity Oversight Monitor (“IOM”) services, Task Order Request (“TOR”) for the **Activation, Revitalization, and Transformation (A.R.T.) Program Phase II – Support & Placemaking Program (“ART Program Phase II”)**.

K2 Integrity is the preeminent risk, compliance, investigations, and monitoring firm — built by industry leaders, driven by interdisciplinary teams, and supported by cutting-edge technology to safeguard our clients’ operations, reputation, and economic security. K2 Integrity represents the merger of K2 Intelligence, LLC an industry-leading investigative, compliance, monitoring, and cyber defense services firm founded in 2009 by Jeremy M. Kroll and Jules B. Kroll, the originator of the modern corporate investigations industry, and the Financial Integrity Network (“FIN”), a premier strategic advisory firm founded by Juan Zarate and Chip Poncy, former senior U.S. Treasury and government officials, dedicated to helping clients achieve their financial integrity goals.

Our teams include former senior government advisors, regulators, compliance officers, technology professionals, prosecutors, lawyers, law enforcement and intelligence professionals, forensic accountants, investigative journalists, and academics, each bringing a unique set of risk management, investigative, and advisory skills and perspectives to the client’s situation.

Headquartered in New York with offices in London, Washington, DC, Madrid, Geneva, Doha, Los Angeles, and Chicago, K2 Integrity employs a total global staff of more than 300 and maintains deep, diverse global networks. We act as advisors to governments, financial institutions, companies, and high-net-worth individuals; our clients frequently include public entities and authorities along with private companies across a wide variety of business sectors.

K2 Integrity 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 and governments with strategic advisory, policy, controls, and training to protect against the full range of illicit financing threats.

K2 Integrity 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 consistently produce efficient results for clients by knowing how and when to employ innovative technology.

K2 Integrity leverages unmatched multidisciplinary experience to develop cutting-edge solutions, stimulate business opportunities, and shape global economic security in a complex world. Whether it’s protecting clients’ assets or navigating the complex financial regulatory landscape to help clients identify, manage, and mitigate risk, K2 Integrity is a trusted advisor striving to meet and exceed clients’ goals in a rapidly changing world.

K2 Integrity is confident it can assist the Authority and provide a monitoring plan that can perform the requested services. We are uniquely qualified to provide the services requested in the Authority’s RFP. No other firm possesses decades of experience, depth of proprietary intelligence, and expertise in performing such services. As explained below, we are currently performing very similar IOM services on four engagements including for the Authority and other New Jersey agencies in which we monitored the expenditure of Covid-19 relief funds.

## 1.2. Management Overview and Technical Approach to Achieve the Scope of Work

K2 Integrity understands that the TOR calls for integrity monitoring services for the ART Program which has received an additional \$15 million in American Rescue Plan (“ARP”) and Local Fiscal Recovery Funds (“SLFRF”) for the ART Program Phase II. The ART Program Phase II will focus on the public space activation grant product and the economic recovery of the downtowns to support placemaking efforts through arts and culture.

The original ART Program was a grant pilot program to partner with local entities to invest in commuter hub cities with commercial corridors that provide jobs to circulate money in the local economy and offer goods and services for residents in Atlantic City and Newark. The ART Program Phase II is expanding the eligibility area throughout New Jersey.

K2 Integrity recognizes (39) awardees have been identified. The minimum grant award for the program is \$100,000 and the maximum grant award is \$500,000.

K2 Integrity is prepared to review the following:

- **Eligible Applicant:**
  - Nonprofit organizations with a 501c (3), 501c (6), or 501c (19) status.
  - Municipalities, governments, and for-profit entities are not eligible to apply, although State institutions of higher education that are one of the eligible nonprofit organization categories are eligible.
  - Any Applicant that received a grant from Phase I of the A.R.T. program is ineligible for Phase II of the Program.
  - Applications are limited to one application per EIN.
- **Eligible Uses**
  - The A.R.T. Program Phase II Program supports the creation of public space activation initiatives, such as placemaking projects, public art installations, and arts-based projects which include, but are not limited to art exhibitions, performances, festivals, parades, concerts or concert series, film and video screenings, and cultural programming. Funding can also be granted to support operational costs for the applicant to execute art or placemaking projects.
- **Eligible Project Locations**

The Project location must meet the following criteria:

- Projects must be in a commercial corridor defined for this program as being in either: a municipality designated as a “Target Urban Municipality,” by the Housing and Mortgage Finance Agency, or designated as a Neighborhood Preservation Program (NPP) Eligible Municipality by the DCA, or a municipality with a designated Department of Transportation “Transit Village”.
- Projects must be in a municipality ranked in the Top 25% of the DCA 2023 Municipal Revitalization Index.
- Projects must be located within 1.5 miles of an active New Jersey Transit, PATCO, PATH, or SEPTA passenger rail or light rail station operating in the same municipality that meets above criteria. (Locations are based on DCA geographic information systems passenger rail station point data.)

- The 31 municipalities with areas eligible for the program are: Asbury Park, Bayonne, Belleville, Burlington City, Camden, City of Orange, Clifton, Dover, Dunellen, East Orange, Egg Harbor City, Elizabeth, Garfield, Hackensack, Hammonton, Jersey City, Linden, Lindenwold, Long Branch, Netcong, New Brunswick, North Bergen, Passaic, Paterson, Pennsauken, Perth Amboy, Plainfield, Rahway, Riverside, Trenton, and Union City.
- Atlantic City and Newark are municipalities that also meet the above location eligibility criteria. However, both cities are ineligible for this phase of the program due to additional funding each city received from the first round of this program, including other FY24 budget appropriations that each city has received through the Urban Investment Fund and the Atlantic City Revitalization Grant Program.

In addition, K2 Integrity understands that the following particulars are part of the requested IOM services:

- Initial program risk assessments.<sup>1</sup>
- Ongoing program risk assessments.
- Evaluation of program performance.
- Evaluation of internal controls associated with the Authority's fiscal management, cash management, acquisition management, property management, and records management capabilities.<sup>2</sup>
- Validation of compliance with sub-grant award agreements, general terms, and special conditions.
- Review of written documents, such as quarterly financial and performance reports, recent audit results, documented communications with the State, prior monitoring reports, pertinent performance data, and other documents or reports, as appropriate.
- Interviews of Authority staff, as well as the constituents they serve, to determine whether program objectives are being met in an efficient, effective, and economical manner.
- Sample eligibility determinations and denials of applications for funding.
- Review of specific files to become familiar with the progression of the disbursement of funds in a particular program, (i.e., are actual expenditures consistent with planned expenditure and is the full scope of services listed in the project work plan being accomplished at the same rate of actual and planned expenditures?).
- Ensuring that the Authority is retaining appropriate documentation, based on Federal and State regulations and guidance, to support fund disbursement.
- Following up with questions regarding specific funding decisions, and reviewing decisions related to emergency situations.
- Facilitating the exchange of ideas and promotion of operational efficiency.
- Identifying present and future needs.
- Promotion of cooperation and communication among Integrity Monitors engaged by other Recovery Programs Participants (e.g., to guard against duplication of benefits).

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<sup>1</sup> This task is included in the NJEDA Task Order Request - Risk Assessment issued on March 24, 2023.

<sup>2</sup> This task is typically included as part of the programmatic risk assessment. Therefore, K2 Integrity does not anticipate performing this task as part of the ART Program Phase II TOR.

- Supporting services, including analysis of internal processes in support of Federal compliance and efficient and effective delivery of program.

### **1.3. General Approach**

Designing, implementing, and managing proactive integrity monitoring and anti-fraud engagements is a core competency of K2 Integrity. As a result, K2 Integrity has an intimate understanding of the risks inherent in federal grant and disaster recovery programs, and knowledge of how to apply our methodologies in an independent fashion while collaborating and calibrating our work with decision-makers.

K2 Integrity has performed this type of work with multiple agencies in the past and continues to do so. In 2020 through present, we were instrumental in assisting the Authority, The New Jersey Department of Agriculture, the New Jersey Department of State, the New Jersey State Police, and the New Jersey Office of Higher Education in monitoring their expenditures of Covid-19 recovery funds.

We have performed integrity monitoring for major disaster recovery engagements since 2001, with our work on the clean-up of the World Trade Center site. Since then, we have performed these services in other engagements for a host of government agencies, including the New Jersey Department of Environmental Protection, the New Jersey Transit Corporation, the Port Authority of New York & New Jersey, the New York State Empire Development Corporation, and the Metropolitan Transportation Authority. Our experience on these past and current disaster recovery engagements allows us to design and implement efficient monitoring methodologies that will minimize the time and expense required to perform the services required on the engagement.

Our proposed work plan approach, as further described in the following sections of this document, focuses on practicality and real-world solutions to how grant funds and grant disbursements are managed. Our years of integrity monitoring experience enable us to target engagement-specific risks, not wasting resources in areas that do not require scrutiny. As we identify problems, we strive to get to the heart of the matter and design solutions to address and prevent integrity issues without burdening the engagement's progress. We also follow through to ensure that proposed solutions work and do not adversely impact the fulfilment of our clients' goals.

We understand that our clients have limited resources. We understand that while we cannot effectively monitor every transaction on every engagement, we maximize our efforts to focus on those activities or transactions most susceptible to risks of fraud, waste, and abuse. We can accomplish these objectives successfully, despite our clients' resource limitations, because we employ a cost-effective, intelligence-driven approach designed to identify the areas of greatest risk (both in terms of impact and likelihood of occurrence), and the controls in place to mitigate those risks, so that we can target the use of our resources and make our sampling of processes and controls maximally effective. This pragmatic approach avoids duplication of the routine operational reviews of grant management controls and processes and provides a value-add for an affordable cost.

K2 Integrity's approach is distinguished by the following characteristics:

#### **Solutions-oriented, Not Process-Driven**

We believe that there is no such thing as a routine situation. We work to understand the problem before forming the solution. We are experts at analyzing internal data, documents, and communications and marrying that to market and situational intelligence to give our clients an edge.

#### **Decades of Combined Experience**

Our senior practitioners bring decades of experience as leaders in their fields and deliver the best solutions to our clients.

#### **Strategic Application of Technology**

Whether using sophisticated digital forensic tools, analytic platforms for interrogating massive data sets, or cutting-edge case management systems, K2 Integrity consistently relies on technology to deliver the most effective solution to our clients.

### **Tailored to the Needs of the Client**

We address client challenges from every possible angle and work tirelessly to craft solutions as quickly and efficiently as the particular situation requires. Our investigations frequently support the legal strategies of law firms.

### **Multidisciplinary Breadth**

Our teams can engineer multifaceted solutions that always put our clients' needs first. Using the latest technological, data, and analytical tools, our teams address client challenges from every angle and discipline to craft solutions.

### **Nimble Teams**

With global experience and local knowledge, we are able to go anywhere in the world at a moment's notice, including many remote or difficult locations. In addition to drawing on our own collective experience, we partner with a worldwide network of experts and practitioners in every field and capacity. This footprint allows us to service client needs wherever and whenever they arise.

### **Independence and Insight**

We are proud of what we have come to stand for: good outcomes, honest outcomes, and a reputation not only for risk advisory, consulting and compliance excellence, but for our independence and insight. Because of it we are trusted by governments around the world.

## **1.4. Addressing Potential Problems**

Given our extensive experience assisting agencies such as the Authority, The New Jersey Department of Agriculture, the New Jersey Department of State, the New Jersey State Police, and the New Jersey Office of Higher Education in monitoring their expenditures of Covid-19 recovery funds, we feel fully equipped to effectively handle any problems that may arise over the scope of this engagement. Our recent engagement with the Authority has given us specific familiarity with Agency procedures, programs, and staff, and should mitigate any potential problems that may arise.

## **1.5. Proposed Work Plan**

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

### **1.5.1. Kickoff and Identification of Monitorship Needs**

#### **Objective**

During this phase of work, K2 Integrity 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.

#### **Project Kick-off Meeting**

During this initial phase of work, K2 Integrity will coordinate a project kick-off meeting with key NJEDA personnel. The purpose of the kick-off meeting is to ensure that all stakeholders are aligned on the project objectives, scope, timelines, and deliverables.

#### **Preparation of an Information Request**

K2 Integrity 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 applicable programmatic, financial, and administrative requirements set forth in Federal-State grant agreements, sub-grant award agreements, and applicable Federal and State laws, regulations, and guidelines in its administration of American Rescue Plan (“ARP”) Coronavirus State Fiscal Recovery Funds (“SLFRF”); Additional programmatic funds received from the State; and other Federal Agency for this purpose and subject to an Integrity Oversight Monitoring requirement.
- 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 to, 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.
- Board memoranda related to the program subject to monitorship.
- Periodic reports and other financial reports that NJEDA produces or receives in its management of the grants and its program utilizing grant funding.
- Sub-grantee application processing data.

#### **Identify Expenditures Subject to Monitorship**

- K2 Integrity will review information obtained to identify funds subject to monitorship and develop a schedule for operational and internal controls review.
- K2 Integrity understands that NJEDA currently estimates \$15,000,000 million subject to monitorship in ARP SLFRF for ART Program Phase II.
- K2 understands that (39) awardees have been identified.
- NJEDA expects that all projects to be completed by December 31, 2026.

### **1.5.2. Ongoing Program Risk Assessment**

#### **Objective**

K2 Integrity understands that the scope of work for the initial risk assessment for the ART Program Phase II may be included separately in the Phase I or II of this program, or NJEDA TOR for Risk Assessment released on March 24, 2023. As such, K2 Integrity will review the risk assessment created under that TOR and will provide any ongoing risk assessment services as needed including, but not limited to: (i) reviewing the operational effectiveness of key control activities against the initial risk matrix to determine residual risk, and (ii) updating the risk assessment to address information obtained throughout the monitorship of the ART Program Phase II. K2 Integrity will ensure that there is no duplication or overlap of services related to the risk assessment.

### **1.5.3. Substantive Testing of Grant Applications**

#### **Objective**

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

K2 Integrity understands the importance of NJEDA’s deadlines, and as such, will be nimble in our approach to conducting tasks in a timely and efficient manner. K2 Integrity 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 reviewed risk assessment from the prior TOR, and knowledge of the ART Program Phase II, K2 Integrity 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:

- Project eligibility criteria;
- Payments;
- Financial reporting and reimbursement; and
- Reconciliation.

Utilizing information learned from the risk assessment and initial analysis of data, we will determine the appropriate weighting of random and judgmental sampling to best identify noncompliant and fraudulent transactions. We will identify potential exceptions based on the transactions testing, which will include potential exceptions to established controls as well as potential indicators of fraud, waste, or abuse. We will conduct follow-up inquiries to obtain an understanding of the root cause of the exceptions and provide recommendations regarding control remediation. Testing and follow-up activity will include inquiry, observations, and forensic analysis of books and records to ensure that procedures and controls were executed based on program requirements and that Authority financial data reconcile with transactional and source data.

K2 Integrity’s team of forensic accountants, investigative attorneys, forensic engineers, and investigators are available to conduct onsite monitoring, interviews, and data capture in the event of noncompliance with reporting requirements, unresponsiveness, allegations of misuse of funds, or other high-risk.

K2 Integrity has a vast network of professionals in additional areas of practice, including commercial lending and economic development incentives structuring, who are available to provide services at NJEDA’s discretion should the need arise.

### 1.5.4. Reporting

K2 Integrity will provide draft quarterly reports to the Authority, with a copy to [TreasuryIM@treas.nj.gov](mailto:TreasuryIM@treas.nj.gov), on the last day of the quarter detailing the specific services rendered and any findings of waste, fraud, or abuse. K2 Integrity will utilize the report templates on the Office of the State Comptroller’s website for submittal.

### 1.5.5. Engagement Timeline

K2 Integrity has prepared the following proposed timeline for the initial year of the Task Order based on the information presently available at the time of proposal. The timeline may need to be adjusted due to circumstances as they arise including, but not limited to, requirements of Task Orders that the Authority may issue.

Key Milestone:	Date:
TOR Award	October 01, 2025
Kick-Off Meeting	October 15, 2025

<b>Key Milestone:</b>	<b>Date:</b>
<b>IOM Information Request</b>	October 15, 2025
<b>Obtain Requested Information</b>	October 31, 2025
<b>Interviews of Authority Stakeholders</b>	November 03, 2025
<b>Conduct Quarterly Compliance Testing</b>	November 10, 2025 – December 12, 2025
<b>Issue Interim Report</b>	December 15, 2025
<b>Draft Quarterly Report Preparation</b>	December 22, 2025
<b>Draft Quarterly Report Submission</b>	December 29, 2025
<b>Quarterly Report Finalization</b>	January 14, 2026
<b>Conduct Quarterly Compliance Testing</b>	January 05, 2026 – March 16, 2026
<b>Issue Interim Report</b>	March 16, 2026
<b>Draft Quarterly Report Preparation</b>	March 19, 2026
<b>Draft Quarterly Report Submission</b>	March 30, 2026
<b>Quarterly Report Finalization</b>	April 13, 2026
<b>Conduct Quarterly Compliance Testing</b>	April 01, 2026 – June 15, 2026
<b>Issue Interim Report</b>	June 19, 2026
<b>Draft Quarterly Report Preparation</b>	June 22, 2026
<b>Draft Quarterly Report Submission</b>	June 29, 2026
<b>Quarterly Report Finalization</b>	July 13, 2026
<b>Conduct Quarterly Compliance Testing</b>	July 06, 2026 – September 15, 2026
<b>Issue Interim Report</b>	September 21, 2026
<b>Draft Quarterly Report Preparation</b>	September 23, 2026
<b>Draft Quarterly Report Submission</b>	September 30, 2026
<b>Quarterly Report Finalization</b>	October 14, 2026

## 2. Organization Chart

Bradley Sussman  
Senior Executive Manager

Tejah Duckworth  
Senior Executive Manager

Michael Bernstein  
Mid-Level Manager

Naomi Pena  
Mid-Level Manager

Michael Quevedo  
Staff Auditor

Bruce Archer  
Staff Auditor

### 3. Key Team Member List

Our Key Team Members for this TOR are identified below:

Key Team Member	Proposed Role
Bradley Sussman	Executive Oversight of IOM Team
Tejah Duckworth	Project Management
Michael Bernstein	Management of All Audit Functions

### 4. NJEDA Task Order Request – Vendor Response Form

Attached please find K2 Integrity's TOR Vendor Response Form, RFP Exhibit B3, as Appendix 1.

K2 Integrity understands that the term of the monitorship over the ART Program Phase II is until all funds have been dispersed, which the NJEDA anticipates will occur by December 31, 2026, and all post-award compliance work is completed. As such, K2 Integrity's proposes a budget to reflect the period of the Notice to Proceed to December 31, 2026. K2 Integrity will review up to twenty (20) applicants who are awarded funds from the ART Program Phase II. K2 Integrity's total budget for this TOR is not-to-exceed \$93,290.

## Appendix 1 – Vendor Response Form

**NEW JERSEY ECONOMIC DEVELOPMENT AUTHORITY  
TASK ORDER REQUEST - VENDOR RESPONSE FORM**  
[Reference RFP #2022-RFP-144-17]

TASK ORDER REQUEST # 144-17

The undersigned, having familiarized himself/herself with the conditions affecting the cost of the work and with the Authority Contract documents agrees to furnish all mobilization, insurances, labor, materials and services, and perform all work as described in the Contract documents, per the rates included in the Fee Schedule. The Contractor is responsible for verifying and estimating all quantities for providing the prices.

<b>CONTRACTOR NAME</b>			
<b>PROJECT SUMMARY</b>		ART Support & Placemaking Program - Phase II	
<b>COVID-19 Recovery Programs valued at \$20 million or more</b>		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>STANDARDIZED POSITIONS/TITLES</b>	<b>HOURLY RATES</b>	<b>NUMBER OF HOURS</b>	<b>PRICE</b>
Senior Executive / Manager	\$340	5	\$1,700
Mid-Level Manager	\$290	177	\$51,330
Low-level (or similar title)	\$220	183	\$40,260
Administrative/Support Staff			
<b>TOTAL PRICE</b>			\$93,290
<p><b>Contractor agrees as follows:</b>                  Project completion shall be consistent with the dates outlined on the Task Order Request.                  Scheduling of all work shall be coordinated with the Authority.                  Consultant represents that there is no conflict of interest in the performance of this Task Order Request.                  The Authority is a tax-exempt organization: <span style="background-color: black; color: black;">[REDACTED]</span>.</p>			

Respectfully submitted,

K2 Intelligence LLC  
Name of Firm

Bradley Sussman  
Name of Individual

  
Signature & Title

09/23/2025  
Date

