



April 9, 2025

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

VIA EMAIL ONLY: bsussman@k2integrity.com

**RE: NOTICE OF AWARD: RFP #2022-RFP-144-10 Integrity Oversight Monitor:
Activation, Revitalization, and Transformation (A.R.T.) - Real Estate Habilitation
and Development & Public Space Activation Program**

Dear Mr. Sussman:

Thank you for your response to the Task Order Request for the above referenced program. I am pleased to inform you that K2 Integrity has been awarded this TOR with a total budget not-to-exceed \$77,340.00 for the duration of the monitorship, including the compliance work and related tasks.

We will schedule a kickoff meeting as soon as possible. I look forward to working with K2 Integrity.

Sincerely,

[REDACTED]
Director, Legal Compliance
Accountability Officer

[REDACTED]

cc: [REDACTED], Chief Counsel
[REDACTED], Team Lead, Legal Compliance
2022-RFP-144-10

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

[Reference RFP #2022-RFP-144-10]

VENDOR NAME	Deloitte & Touche, LLP and K2 Integrity
PROJECT TITLE	Activation, Revitalization, and Transformation (A.R.T.) Real Estate Rehabilitation and Development (RERD) and Public Space Activation Program
DATE	3/6/2025
PROJECT SUMMARY	Integrity Monitoring Services for the Capital Access Program
DATE NEEDED	ASAP

NJEDA CONTACT (Name, Title, Address, E-mail & Telephone Number)	<p><u>Activation, Revitalization, and Transformation (A.R.T.) Real Estate Rehabilitation and Development (RERD and Public Space Activation Program questions:</u> ██████████ Assistant Director ██████████</p> <p><u>For general IOM program questions:</u> ██████████, 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-144-10 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.) Phase I – Real Estate and Public Space Activation Program, which is a competitive program funded with \$28,173,685 (not including the \$704,742 *state funded* Uncle Willie’s grant under this program) 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 Real Estate Rehabilitation and Development (RERD) and Public Space Activation Program (PSA), 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 Activation, Revitalization, and Transformation (A.R.T.) Real Estate and Public Space Program.

Program Background:

The ARP, which was signed into law 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 SLFRF, the ARP delivers \$350 billion to state, local, and tribal governments to support their response to, and recovery from COVID-19.

On October 12, 2022, the NJEDA Board approved the Activation, Revitalization and Transformation (“ART”) Grant Pilot Program (“Program”). The goal of the ART Program is to partner with local entities to proactively address the negative economic impacts of the pandemic by investing in projects that create the environment necessary to attract and retain residents and talent, enable business creation and attractions, enhance downtown vitality, and help local governments avoid future budget crises, as well as, build a stronger and fairer New Jersey economy by making new, impactful, and strategic investments in commuter hub cities with commercial corridors. Commercial corridors play a vital role in both urban and rural geographies, serving as economic engines for communities by providing jobs that keep money circulating in the local economy, offer goods and services for residents, and power entrepreneurship as well as wealth building. (Note: See the descriptions below for the two (2) products under the ART Program.)

The Program was initially capitalized in 2023 with \$10,000,000 in funds derived from a \$5,000,000 American Rescue Plan (“ARP”) allocation to the Casino Reinvestment Development Authority (“CRDA”) for Atlantic City, as well as a \$5,000,000 ARP allocation dedicated to municipalities with dwindling commuters due to COVID-19. (Note: As per data collected in the 2015 - 2019 U.S. Census American Community Survey and as analyzed by the New Jersey Department of Community Affairs (DCA), the City of Newark was the municipality that, prior to the COVID-19 pandemic, had a daytime population with the largest total difference between the residential population and the total daytime population.)

On April 26, 2023, the NJEDA’s Board approved a Memorandum of Understanding (MOU) between the NJEDA and DCA, and another MOU, dated June 21, 2023, between NJEDA and CRDA regarding the disbursement of ARP Act – CSLFRF monies for the ART Program, authorizing the CEO to approve funding of \$5 million from the New Jersey DCA, and funding of \$5 million from CDRA. The Authority received the initial \$10 million in 2023. Each city (Atlantic City and Newark) was allocated \$5,000,000, with a split of 70% (or \$3,500,000) focused on real estate projects and 30% (or \$1,500,000) focused on public space activation projects. All projects must be located within a commercial corridor, which is all locations in the City of Atlantic City and the City of Newark, within one and one-half mile radius of an active New Jersey rail transit station.

The Board approved grant awards totaling \$3 million at the Board Meeting dated December 14, 2023: \$1.5 million for Atlantic City projects; \$1.5 million for Newark projects. The Authority had received more than the remaining \$7 million in funds from eligible applications for real estate projects (projects that received a minimum score of 65 points). The monetary value of all eligible applications received totaled \$38,875,441.70.

The Fiscal Year 2024 Appropriations Act (P.L. 2023, c.74) appropriated \$50 million for “Urban Investment Fund” from American Rescue Plan (“ARP”) Coronavirus State and Local Fiscal Recovery Funds (“SLFRF”). Of that amount, \$11,801,852 was allocated to the ART Real Estate Grant for projects (and associated administrative costs). The Fiscal Year 2024 Appropriations Act (P.L. 2023, c.74) also appropriated \$30 million in SFRF for “Atlantic City Initiatives”. Of that amount, \$6,349,778 was allocated to the ART Real Estate Grant for projects in Atlantic City and associated administrative costs. The ART Program was further modified on February 7, 2024, for the additional funding from the “Urban Investment Fund” and the “Atlantic City Initiatives”. The total amount of awards allocated to ART real estate applicants in Atlantic City was \$9,849,778 and in Newark was \$15,301,852.

Pursuant to the October 12, 2024 Board approvals, a balance of \$682,687 and other future funds that become available from applicant withdrawals, to be reallocated to another NJEDA program, the Atlantic City Revitalization Grant Program. Please see attached October 12, 2024 Board Memo.

Additionally, at the November 18, 2024 NJEDA Board meeting, a supplemental grant award funding was approved for an additional award to Uncle Willie Green Wings LLC under the ART Program Newark Real Estate, which was made using **unrelated State funds**. Please see attached November 18, 2024 Board Memo for additional context regarding this Program and its awardees.

Activation, Revitalization, and Transformation (ART) Program:

This Pilot Program addresses economic harms through two (2) products: 1) The Real Estate Rehabilitation and Development product (RERD) that supports new construction or the rehabilitation of vacant, underutilized, blighted and/or historic structures throughout the two (2) cities identified, and 2) The Public Space Activation product (PSA) that supports the development of permanent place-based infrastructure associated with traditional downtowns, social-zones, outdoor dining, and place-based public spaces. Entities were eligible to apply for one or both ART programs.

Projects must also demonstrate how the proposed expenditure will mitigate the impact of COVID-19 in either Newark or Atlantic City. As part of the application, each project was required to submit a narrative explicitly stating the negative externality that the proposed project will address, and how this expenditure will increase the economic resilience and vitality of the commercial corridor. Funded projects must be completed by December 31, 2026.

Eligibility Criteria:

RERD eligible applicants are:

Non-profit economic development or redevelopment agencies that can demonstrate capacity to complete a development or redevelopment project or have experience with a project of a similar scope;
Commercial property owner(s) that can demonstrate capacity to complete a development and redevelopment project or have experience with a project of a similar scope;
Private or non-profit developers that can demonstrate capacity to complete a development and redevelopment project or have experience with a project of a similar scope.

PSA eligible applicants are nonprofit organizations with a 501c (3) or 501c (19) status and that are created to support and revitalize communities.

Municipalities and government entities were not eligible to apply for either RERD or PSA product.

All applicants were required to certify at time of application of their existing project costs and their financial need.

For projects to be eligible for ART Program funding, all proposals had to demonstrate how the proposed expenditure would mitigate the impact of COVID-19 in either Newark or Atlantic City. As part of the application, each project was required to submit a narrative explicitly stating the harm that the proposed project would address, and how this expenditure would increase the economic resiliency and vitality of the commercial corridor as we transition from pandemic to endemic.

Commercial corridors will be all locations in the City of Atlantic City and The City of Newark within one and one-half mile radius of an active New Jersey rail transit station.

Project Considerations:

Competitive projects for both the Real Estate Rehabilitation and Development product and the Public Space Activation product were required to clearly address the impacts of the COVID-19 public health emergency by responding to the following considerations in the application:

- 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 complies with all the SLFRF requirements.
- Locations: Projects must be located in Atlantic City or Newark. All projects must support commercial corridors and be located in urban areas with mass transit.
- Capacity: The applicant must have experience implementing a project of a similar scope.
- Long-term impacts: Competitive applicants must articulate via the application process how the proposal will have a positive long-term impact in the community. This may include certain factors like renovating a facility to support small businesses, including, how it will enable growth in population and tax revenue.
- Financial Viability: Must demonstrate long-term financial viability of the project and a time period for project completion through the submission of a pro forma.
- Local impact considerations: A project must demonstrate how it supports the goals and visions stated (if available) in either a local master plan, downtown or neighborhood plan, capital improvements plan and/or economic development strategy, along with the readiness of infrastructure.
- U.S. Treasury reporting: Ability to provide the U.S. Department of the Treasury with relevant reporting for all

project expenditures exceeding \$1 million, specifically, all proposals must provide a narrative on how the project will address the impacts of COVID-19 in either Atlantic City or Newark, and why this capital expenditure is the most appropriate to address the economic harms caused by COVID.

Real Estate Rehabilitation and Development Product:

Applications for the **Real Estate Rehabilitation and Development Product** opened on May 30, 2023, and closed on August 22, 2023.

The RERD product supports real estate development financing in the form of grants for real estate rehabilitation, new construction, and development costs associated to each project. These projects must be commercial or mixed-use and can include: the renovation or restoration of vacant buildings or square feet of vacant space within a partially occupied building, new construction of at least 10,000 square feet on an existing vacant lot, and costs associated with property acquisition. Mixed-use construction projects were eligible for funding under the ART Program, however, demolition of a structure to create a vacant lot for future development is ineligible for ART Program funding. Additionally, completely residential real estate development projects were ineligible for ART Program funding.

The minimum award request for RERD product is \$250,000. The maximum award for the RERD product is \$3,500,000.

The Program has 17 approved applicants, which are listed below. The applicant shall be responsible for assuring the compliance of any strategic partners and/or subcontractors with all terms and conditions of this application and assumes the sole and absolute responsibility for any payments due to any municipal, county, or strategic partners.

RERD Approved Applicants

Newark:

1. Delta's Newark II, LLC (d/b/a Delta's Newark) – Product ID PROD-00312554 (funds not yet disbursed)
2. RBH-TRB East Mezz Urban Renewal Entity, LLC – Product ID PROD-00312552 (funds not yet disbursed)
3. Newark Science and Sustainability, Inc. – Product ID PROD-00312551 (funds not yet disbursed) (*see note below regarding potential withdraw*)
4. Hospitality Concepts LLC (d/b/a Katherine's Restaurant) – Product ID PROD-00312550 (funds not yet disbursed)
5. Project for Empty Space – Product ID PROD-00312547 (1st disbursement of funds completed)
6. New Jersey Performing Arts Center (d/b/a New Jersey Performing Arts Center Corporation) – Product ID PROD-00312537 (funds not yet disbursed)
7. Ablem Food Services NJ, LLC (d/b/a Melba's 550) – Product ID PROD-00312509 (funds not yet disbursed)
8. EQUALSPACE LLC – Product ID PROD-00312503 (funds not yet disbursed)
9. Uncle Willie Green Wings L.L.C. – Product ID PROD-00312553 (funds not yet disbursed; not supported with federal funds)

Atlantic City:

10. 155 S TENNESSEE QOZB, LLC – Product ID PROD-00312512 (funds not yet disbursed)
11. MAP 3 PARTNERS LLC – Product ID PROD-00312541 (funds not yet disbursed)
12. Silk Road AC LLC – Product ID PROD-00312510 (funds not yet disbursed)
13. Jemal's Tate LLC – Product ID PROD-00312522 (funds not yet disbursed)

Real Estate – AC (PW Applicable)			
City	Type	Project	Grant Award
AC	RE	MAP 3 Partners LLC	\$2,484,850
AC	RE	155 S Tennessee QOZB, LLC	\$2,000,000
AC	RE	Jemal's Tate, LLC	\$1,182,241
AC	RE	Silk Road AC LLC	\$3,500,000

Real Estate - Newark (PW Not Applicable)			
City	Type	Project	Grant Award
EWR	RE	Project for Empty Space	\$1,010,189
EWR	RE	New Jersey Performing Arts Center (NJ PAC)	\$1,500,000
EWR	RE	Ablem Food Services NJ, LLC d/b/a Melba's 550	\$2,518,297
EWR	RE	EqualSpace LLC	\$2,007,401

Real Estate - Newark (PW Applicable)			
City	Type	Project	Grant Award
EWR	RE	Delta's Newark II, LLC	\$3,494,933
EWR	RE	RHB-TRB East Mezz Urban Renewal Entity, LLC	\$1,061,312
EWR	RE	Newark Science and Sustainability, Inc	\$400,000
EWR	RE	Hospitality Concepts LLC	\$3,309,720
EWR	RE	Uncle Willie Green Wings LLC	\$704,742*

**NOTE: Uncle Willie Green Wings LLC is not supported by federal funds by this program.*

RERD Withdrawn Applicants:

1. **1519 Boardwalk QOZB LLC** (d/b/a **BL51 QOZF, LLC**) – Product ID PROD-00312530
2. **MudGirls Studios, a NJ Nonprofit Corporation** (d/b/a **MudGirls Studios**) – Product ID PROD-00312479
3. **2702 Artic Associates LLC** Product ID PROD-00312521

(a) At the time of issuance of this TOR, Applicant, Newark Science and Sustainability, Inc. may withdraw due to concerns regarding their proposed budget and PW/AA requirements.

Public Space Activation Product:

Applications for the Public Space Activation Product opened on May 30, 2023, and closed on August 22, 2023.

Under the ART Program’s PSA product, thirty percent (30%) of total program funding (\$3 million) will support the PSA product for public space activation initiatives. The awards will be split evenly between to the two cities – Newark and Atlantic City. This product can support up to \$1.5 million in awards to applicants in Newark and \$1.5 million in awards to applicants in Atlantic City. This funding can support the creation of public space activation initiatives, such as placemaking projects, public art installations, arts-based placemaking projects, signage, and streetscape improvements. Funding can also be utilized for support for small businesses through master leases in commercial corridors, as well as the purchase of parkettes, heaters, tents, and other equipment necessary for activation of outdoor spaces to be used by the community or small businesses. Funding can also be granted to support the activation of public spaces through events, and operational costs for arts organizations to execute public space activation programs. Additionally, funding can be utilized for master leases and subleases in mixed-use and commercial properties for programmatic use, such as, incubator space, small business support, and events. As a requirement of receiving ART funding, all applicants that receive grant money for the creation of programs will be required to submit quarterly reports to demonstrate backend compliance to NJEDA.

The minimum award request for the PSA product is \$250,000. The maximum award for the PSA product is \$1,500,000.

The Program has 4 approved applicants, which are listed below. The applicant shall be responsible for assuring the compliance of any strategic partners and/or subcontractors with all terms and conditions of this application and assumes the sole and absolute responsibility for any payments due to any municipal, county, or strategic partners.

PSA Approved Applicants:

1. Newark Alliance Inc. – Product ID PROD-00312548 (funds disbursed)
2. Atlantic City Arts Foundation a NJ Nonprofit Corporation– Product ID PROD-00312507 (funds not yet disbursed)
3. Stockton University – Product ID PROD-00312506 (funds disbursed)

4. Inlet Public Private Association, Inc. (d/b/a Absecon Lighthouse) – Product ID PROD-00312486 (funds disbursed)

Public Space Activation - AC			
City	Type	Project	Grant Award
AC	PS	Inlet Public Private Association	\$250,000
AC	PS	Stockton University	\$1,001,300
AC	PS	Atlantic City Arts Foundation	\$248,700

Public Space Activation - Newark			
City	Type	Project	Grant Award
Newark	PS	Newark Alliance Inc.	\$1,500,000

Disbursement:

For RERD projects, the applicant will receive one (1) disbursement of 50% of the total award amount upon 50% of project completion, as demonstrated through their AIA document. A second disbursement will occur when the applicant provides a Certificate of Occupancy and proof of completion.

For PSA projects, grantees will receive 100% of the grant amount upon execution of a grant agreement and then will be required to report quarterly upon project completion. NJEDA will provide the applicant with the report, and they will complete the required documentation indicating proper use of funds.

For RERD and PSA projects, NJEDA will disburse grants only to the applicant. All successful applicants must follow a uniform disbursement schedule. Applicants are required to submit progress reports to receive grant disbursements. At a minimum, the progress reports must include:

- Summary of funds expended to date;
- Narrative detailing milestones achieved and overall progress toward completion of final plan; and
- Proof of prevailing wage/Affirmative Action compliance.

Per federal SLFRF program guidelines, all ART Program funds must be obligated by December 31, 2024, and must be expended by December 31, 2026. Therefore, project readiness is part of the ART Program and all other funding sources must be secured. Additionally, as required by SLFRF, all applicants will be reviewed for duplication of benefits.

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

Documents Attached:

The NJEDA Board Memorandum (dated October 12, 2022) with program specifications/eligibility criteria, Board Modification Memorandum (dated February 7, 2024), Board Memo (October 12, 2024), Board Memo (November 18, 2024), Board Modification Memorandum (dated December 14, 2023), NJEDA’s executed MOU with DCA and NJEDA’s executed MOU with CRDA are attached to this Task Order Request.

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.

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 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 the 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 and 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*.

Pricing & No Modifications:

The IM must ensure that all pricing reflects itemized costs for all activities required for the Activation, Revitalization, and Transformation (A.R.T.) Real Estate Rehabilitation and Development (RERD and Public Space Activation Program 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.) Real Estate Rehabilitation and Development (RERD and Public Space Activation 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.**

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-10)]**

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-10)
RFP #

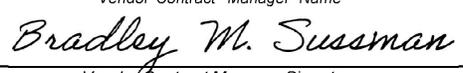
ART Real Estate & Public Space Activation Program
RFP Title

- 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:

Michael Bernstein
Vendor Employee Name

Vendor Employee Signature

Associate Managing Director
Title
3/20/25
Date

Bradley Sussman
Vendor Contract Manager Name

Vendor Contract Manager Signature

Senior Managing Director
Title
3/20/25
Date



INTEGRITY MONITORING

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

Task Order Request – Activation, Revitalization, and Transformation (A.R.T.) Real Estate Rehabilitation and Development (RERD) and Public Space Activation Program

Prepared for:
New Jersey Economic Development Authority

Attention:
[REDACTED]
Assistant Director
New Jersey Economic Development Authority
36 West State Street
P.O. Box 990
Trenton, NJ 08625-0990

April 7, 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.) Real Estate Rehabilitation and Development (RERD) and Public Space Activation Program (PSA) (“ART Program”)**.

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. The ART Program is 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.

K2 Integrity recognizes (13) RERD applicants (9-Newark and 4-Atlantic City) have been approved, but funds have not been dispersed yet. In addition, (4) PSA applicants have been approved and for (3) applicants funds have been dispersed. Further, all projects must be fully completed by December 31, 2026.

K2 Integrity is prepared to review the following:

- **Eligible Applicant:**
 - Eligible RERD applicants are municipalities who meet the following criteria:
 - Non-profit economic development or redevelopment agencies that can demonstrate capacity to complete a development or redevelopment project or have experience with a project of a similar scope.
 - Commercial property owner(s) that can demonstrate capacity to complete a development and redevelopment project or have experience with a project of a similar scope.
 - Private or non-profit developers that can demonstrate capacity to complete a development and redevelopment project or have experience with a project of a similar scope.
 - PSA eligible applicants are nonprofit organizations with a 501c (3) or 501c (19) status and that are created to support and revitalize communities.
 - Municipalities and government entities were not eligible to apply for either RERD or PSA product.
 - Commercial corridors will be all locations in the City of Atlantic City and The City of Newark within one and one-half mile radius of an active New Jersey rail transit station.
 - Minimum award request for RERD product is \$250,000. The maximum award for the RERD product is \$3,500,000.
 - Eligible PSA awards will be split even between the two cities – Newark and Atlantic City:
 - Awards can support up to \$1.5 million in awards to applicants in Newark and \$1.5 million in awards to applicants in Atlantic City.
 - Funding can support the creation of public space activation initiatives, such as placemaking projects, public art installations, arts-based placemaking projects, signage, and streetscape improvements; small businesses through master leases in commercial corridors, as well as the purchase of parkettes, heaters, tents, and other equipment necessary for activation of outdoor spaces to be used by the community or small businesses; public spaces through events, and operational costs for arts organizations to execute public space activation programs; and master leases and subleases in mixed-use and commercial properties for programmatic use, such as, incubator space, small business support, and events.
 - Minimum award request for the PSA product is \$250,000. The maximum award for the PSA product is \$1,500,000.

- **Eligible Uses**

- The RERD product supports real estate development financing in the form of grants for real estate rehabilitation, new construction, and development costs associated to each project. These projects must be commercial or mixed-use and can include: the renovation or restoration of vacant buildings or square feet of vacant space within a partially occupied building, new construction of at least 10,000 square feet on an existing vacant lot, and costs associated with property acquisition. Mixed-use construction projects were eligible for funding under the ART Program, however, demolition of a structure to create a vacant lot for future development is ineligible for ART Program funding. Additionally, completely residential real estate development projects were ineligible for ART Program funding.
- The minimum award request for RERD product is \$250,000. The maximum award for the RERD product is \$3,500,000.

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

- Initial program risk assessments.¹
- 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.²
- 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).

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

² 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 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 \$10,000,000 million subject to monitorship in ARP which includes \$5,000,000 from the Casino Reinvestment Development Authority (“CRDA”) for Atlantic City and \$5,000,000 from New Jersey Department of Consumer Affairs (“DCA”) for ART Program. In addition, under the ART Program’s 30% of total program funding \$3,000,000 will support the PSA program.
- K2 understands that thirteen (13) RERD and (4) PSA applications have been approved.
- 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 may be included separately in the Phase 1 or 2 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. 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, 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:

- Sub-recipient application processing, payment, and monitoring;
- Grant management;
- Procurement;
- Payments;
- Financial reporting and reimbursement; and
- Reconciliation.

Review Sub-recipient Grant Applications

With respect to the sub-recipients, K2 Integrity will request and review the list of sub-recipient grant applications received and select a risk-based sample of transactions for testing using a combination of random and judgmental sampling designed to provide appropriate coverage of populations subject to monitorship and assess potential red flags. Transactional attributes to be tested include, but are not limited to, the following:

- Reviewing determinations and denials of applications for proper action.
- Reviewing documentation from the applicant to determine whether eligibility requirements are met.
- Assess adequacy of documentation provided by the sub-recipient as part of its application.
- Review actual disbursement files to ensure that all planned disbursements agree with actual amounts as stated in the sub-recipient files.
- Ensure that all appropriate supporting documentation was provided to support subrecipient's use of funds.
- Verify that applicants are registered in New Jersey, meet guidelines for grant-specific expenditures, and are in good standing with sister agencies including the New Jersey Department of Labor, Workforce Development, and Department of Taxation.
- Validating sub-recipient banking information of sub-recipients with sister agencies to detect and deter misappropriations of funds.
- Recalculating grant award amounts to determine whether the appropriate value of funds was disbursed.

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, 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	April 01, 2025
Kick-Off Meeting	April 15, 2025
IOM Information Request	April 15, 2025
Obtain Requested Information	April 30, 2025
Interviews of Authority Stakeholders	May 2, 2025
Conduct Quarterly Compliance Testing	May 5, 2025 – June 16, 2025
Issue Interim Report	June 19, 2025
Draft Quarterly Report Preparation	June 23, 2025
Draft Quarterly Report Submission	June 30, 2025
Quarterly Report Finalization	July 14, 2025
Conduct Quarterly Compliance Testing	July 3, 2025 – September 15, 2025
Issue Interim Report	September 15, 2025
Draft Quarterly Report Preparation	September 19, 2025
Draft Quarterly Report Submission	September 29, 2025
Quarterly Report Finalization	October 13, 2025
Conduct Quarterly Compliance Testing	October 2, 2025 – December 15, 2025

Key Milestone:	Date:
Issue Interim Report	December 19, 2025
Draft Quarterly Report Preparation	December 22, 2025
Draft Quarterly Report Submission	December 29, 2025
Quarterly Report Finalization	January 12, 2026
Conduct Quarterly Compliance Testing	January 5, 2026 – March 16, 2026
Issue Interim Report	March 20, 2026
Draft Quarterly Report Preparation	March 23, 2026
Draft Quarterly Report Submission	March 30, 2026
Quarterly Report Finalization	April 14, 2026

2. Organization Chart



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 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 thirteen (13) RERD and (4) PSA applicants who have currently received Federal funding for the ART Program. K2 Integrity’s total budget for this TOR is not-to-exceed \$77,340.

Appendix 1 – Vendor Response Form

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

TASK ORDER REQUEST # 144-10

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.

CONTRACTOR NAME	K2 Intelligence LLC		
PROJECT SUMMARY	ART Real Estate & Public Space Program		
COVID-19 Recovery Programs valued at \$20 million or more	Yes <u> X </u> No _____		
STANDARDIZED POSITIONS/TITLES	HOURLY RATES	NUMBER OF HOURS	PRICE
Senior Executive / Manager	\$340	5	\$1,700
Mid-Level Manager	\$290	122	\$35,380
Low-level (or similar title)	\$220	183	\$40,260
Administrative/Support Staff			
TOTAL PRICE			\$77,340
<p>Contractor agrees as follows: 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: ██</p>			

Respectfully submitted,

K2 Intelligence LLC

Bradley Sussman, Sr. Mang. Director
Name of Individual


Signature & Title

04/07/2025
Date

