



October 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-144-016 Integrity Oversight Monitor
Property Assemblage Fund**

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 \$89,750 for the duration of the monitorship, including compliance work and related tasks.

We will schedule a kickoff meeting with the Property Assemblage Fund 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

[REDACTED]

cc: [REDACTED], Chief Counsel
[REDACTED], Chief Compliance Officer
[REDACTED], Team Lead, Legal Compliance
2022-RFP-144-016

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

[Reference RFP #2022-RFP-144-16

VENDOR NAME	Deloitte & Touche, LLP and K2 Integrity
PROJECT TITLE	Property Assemblage Fund
DATE	8/13/2025
PROJECT SUMMARY	Integrity Monitoring Services for the Property Assemblage Fund
DATE NEEDED	ASAP

NJEDA CONTACT (Name, Title, Address, E-mail & Telephone Number)	<p>Property Assemblage Fund Program Team Contact – name and email address. [REDACTED] Sr Project Officer RE Development [REDACTED]</p> <p>For TOR and general IOM Project questions: [REDACTED], Director – Legal Compliance and Accountability Officer [REDACTED]</p>
--	---

Cost Submission: Please provide a cost estimate for the above referenced project, in accordance with the Fee Schedule submitted for RFP #2022-RFP-144-16 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 Projects 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 Projects 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 the Property Assemblage Fund, which is a competitive Project funded with \$23,000,000 by the Coronavirus State Fiscal Recovery Fund (CSFRF or SFRF).

Pursuant to RFP section 3.3.1, the awardee of this Task Order is requested to perform integrity monitoring services for the above referenced Property Assemblage Fund, in accordance with the requirements of the RFP, addenda, Executive Order 166 (Murphy, 2020), American Rescue Plan Act (ARP) of March 11, 2021, 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 Property Assemblage Fund.

Project Background:

The 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.

In September 2023, NJEDA board approved the following;

- Creation of the Property Assemblage Fund which will permit the Authority to acquire property for real estate development projects which will grow the state's economy, support high-quality job creation, catalyze investment, and foster vibrant, healthy, inclusive community development.
- Authorizing the Chief Executive Officer (CEO) to enter a Memorandum of Understanding (MOU) with the New Jersey Department of Community Affairs (DCA), accepting \$30 million of SLFRF for the Property Assemblage Fund and will agree to comply with the federal requirements for the use of those funds.
(Please review the attached 9/23/2023 Board Memorandum, and MOU signed 11/27/2023 for additional background context.)

The 2022-23 annual budget, *see* P.L. 2022 c.133, the State allocated \$30 million to the NJEDA for "Real Estate Projects Fund – Property Assemblage" (Fund) to purchase real estate and create projects which grow the state's economy, support high-quality job creation, catalyze investment, and foster vibrant, healthy, inclusive community development.

Property Assemblage Fund:

The Fund facilitates development in communities, and in projects and industries to stimulate economic growth, creates jobs and fosters healthy, inclusive community development through the NJEDA's acquisition of real property for a "project" as permitted by the NJEDA's enabling act at N.J.S.A 34:1B-3. "Project" includes but is not limited to the following: (1) (a) acquisition, construction, reconstruction, repair, alteration, improvement and extension of any building, structure, facility, including water transmission facilities or other improvement, whether or not in existence or under construction, (b) purchase and installation of equipment and machinery, (c) acquisition and improvement of real estate and the extension or provision of utilities, access roads and other appurtenant facilities.....which are to be used or occupied by any person in any enterprise promoting employment." NJEDA is using the \$23 million to pursue projects in the following categories:

Promote Community Economic Development

This involves acquiring real estate to support the development of initiatives that foster both community and economic advancement. To be eligible, projects must satisfy all four of the following criteria:

- Parcels that are vacant, underutilized, or abandoned to be acquired for redevelopment;
- Future development of a commercial or mixed-use real estate project;
- Demonstrates that the project's timeline meets the requirements currently set forth by SLFRF (SLFRF Fund Guidelines currently state that the funds must be obligated by December 31, 2024, and expended by December 31, 2026);
- That absent the NJEDA's assistance, the property is unlikely to be developed due to its complexity, costs, or development timeline.

Addressing Food Insecurity

This involves acquisition of property for projects which meet with the NJEDA's previously approved guidelines for Food Deserts as outlined below:

- Promotes the development of a retail grocery store no smaller than 16,000 square feet;
- Must be in one of New Jersey's identified Food Deserts;
- Demonstrates the project can be completed within the timeframe required by the SLFRF Regulations (SLFRF currently requires funds to be obligated by December 31, 2024, and expended by December 31, 2026);
- Demonstrates it is financially viable and likely to be completed as planned;

- Demonstrates that absent the NJEDA's assistance, the property would not be developed by the traditional markets due to costs, complexity, or long development timeline.

Eligible Expenses

Additionally, funds may be used for the following activities related to property acquisition:

- Title reports and insurance.
- Appraisals related to property acquisition and improvements.
- Market, feasibility, and other studies to support the property's acquisition and development.
- Environmental studies, remediation, approval, and related fees.
- Legal fees associated with the acquisition of the property, property development, leasing and sale.
- Purchase of real property (e.g., vacant land and/or buildings)
- Required site planning, related approvals, and fees.
- Site and/or building improvements.
- Other costs typically associated with real estate acquisition and development.

Role of the NJEDA

1. NJEDA staff identifies and evaluates properties for acquisition base upon standard due diligence and a preliminary project development plan as defined by the Authority's enabling act N.J.S.A. 34:1B-3. Staff then asks Board Members to assess and vote upon entering a Contract of Sale for the subject property.
2. Post execution of the Contract of Sale, NJEDA staff completes all necessary due diligence for the property's acquisition and the project's development, as defined in the Authority's enabling act, N.J.S.A. 34:1B-3. At such time, the staff will ask Board Members to review and vote upon the purchase and development of the project.
3. After the Board Members approve acquisition of the property, the staff will manage the development of the project.

Fund Eligibility

NJEDA staff applies the eligibility criteria listed below to evaluate and propose a property acquisition for a planned project, using the following guidelines.

- The applicant demonstrates that funds can be obligated and expended per the SLFRF Regulations;
- The applicant demonstrates that without the NJEDA's efforts the property/project is unlikely to be developed due to complexities with the site, project costs and/or development timeline;
- The grant is used for the acquisition of real estate and related costs;
- Projects must demonstrate they will grow the state's economy, support high-quality job creation, catalyze investment, and foster vibrant, healthy, inclusive community development;
- For projects with construction exceeding \$2,000 prevailing wages must be paid;
- The proposed project must demonstrate financial viability with The NJEDA's assistance;
- Be for the development of commercial real estate or mixed-used project;
- The acquisition shall not exceed 120% of the appraised value;
- The project should meet an established and defined community need;
- Projects must be prudent and reasonable as defined by CRF §200.404;
- Projects should ensure there are no duplication of benefits for a government entity, business, or other entity;
- The NJEDA will only purchase properties in which relocation of tenants is not required;
- Properties and projects should meet the criteria outlined in section B. Fund Purpose and Strategy outlined above.
- Staff will review properties and projects on a rolling basis and make recommendations to the board based on the guidelines above and funds available;
- No funds will be granted to third parties including local or state government, private businesses, associations, not-for-profits, or individuals.

To maximize impact, NJEDA uses these guidelines for property acquisitions and development*:
RFP Exhibit B1 - TOR

- Minimum: \$1million inclusive of eligible expenses outlined in section C above and site preparation costs.
- Maximum: \$10 million inclusive of eligible expenses outlined in section C above and site preparation costs.

*NJEDA staff may bring project proposals to the Members for consideration which fall outside of these guidelines. This may occur because a specific project meets a significant need or will have an impact that staff believes meets the mission of the Authority.

Documents Attached:

- MOU between NJEDA and the NJDCA for Real Estate Project Fund - Property Assemblage Program (11/27/2023);
- Board Memorandum re Property Assemblage Fund. (9/12/2023)

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 \(nj.gov\)](https://www.nj.gov/governor/disaster-recovery-office/gdro-covid-19-oversight)).

- **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 Projects administered by Recovery Plan Participants. OSC may also request that IMs or Recovery Project 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 Property Assemblage Fund 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 Property Assemblage Fund 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 Project, 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



INTEGRITY MONITORING

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

Task Order Request – Property Assemblage Fund

Prepared for:

New Jersey Economic Development Authority

Attention:

Brian Keenan, Sr. Project Officer Real Estate
Real Estate Development
New Jersey Economic Development Authority
36 West State Street
P.O. Box 990
Trenton, NJ 08625-0990

September 7, 2025

Contents

1. Management Overview and Technical Approach	3
1.1. Introduction.....	3
1.2. Management Overview and Technical Approach to Achieve the Scope of Work	4
1.3. General Approach	5
1.4. Addressing Potential Problems	7
1.5. Proposed Work Plan	7
2. Organization Chart.....	11
3. Key Team Member List.....	12
4. NJEDA Task Order Request – Vendor Response Form	12
Appendix 1 – Vendor Response Form.....	13

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 **Property Assemblage Fund (“the Fund”)**.

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 Property Assemblage Fund (“the Fund”). The NJEDA allocated \$30 million in the Coronavirus State and Local Fiscal Recovery Funds (“SLFRF”) towards the Fund to purchase real estate create projects to grow the New Jersey’s economy. The Fund will be used towards two (2) projects to:

- Promote Community Economic Development – to acquire real estate to support the development of initiatives that foster community and economic advancement. Eligibility requirements include:
 - Parcels that are vacant, underutilized, or abandoned to be acquired for redevelopment;
 - Future development of a commercial or mixed-use real estate project;
 - Demonstrates that the project’s timeline meets the requirements currently set forth by SLFRF (SLFRF Fund Guidelines currently state that the funds must be obligated by December 31, 2024, and expended by December 31, 2026);
 - That absent the NJEDA’s assistance, the property is unlikely to be developed due to its complexity, costs, or development timeline.
- Address Food Insecurity – to acquire property for projects that meet the NJEDA’s previously approved guidelines for Food Deserts, including:
 - Promotes the development of a retail grocery store no smaller than 16,000 square feet;
 - Must be in one of New Jersey’s identified Food Deserts;
 - Demonstrates the project can be completed within the timeframe required by the SLFRF Regulations (SLFRF currently requires funds to be obligated by December 31, 2024, and expended by December 31, 2026);
 - Demonstrates it is financially viable and likely to be completed as planned;
 - Demonstrates that absent the NJEDA’s assistance, the property would not be developed by the traditional markets due to costs, complexity, or long development timeline.
- NJEDA’s role includes:
 - Identifying and evaluating properties for acquisition; and
 - Post execution of the Contract of Sale, including all necessary due diligence for the property’s acquisition and the project’s development.

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.

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

- 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 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).
- 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.

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 Fund TOR.

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, grant award agreements, and applicable Federal and State laws, regulations, and guidelines in its administration of the Coronavirus State and Local 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.

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 \$30 million subject to monitorship in the Coronavirus State and Local Fiscal Recovery Fund (“SLFRF”) towards the Fund.
- NJEDA expects that all grant funds must be expenses prior to 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 Fund 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 Fund. K2 Integrity will ensure that there is no duplication or overlap of services related to the risk assessment.

1.5.3. Substantive Testing of Eligible Expenses of the Fund

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 Fund, 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 eligibility requirements:

- The applicant demonstrates that funds can be obligated and expended per the SLFRF Regulations;
- The applicant demonstrates that without the NJEDA’s efforts the property/project is unlikely to be developed due to complexities with the site, project costs and/or development timeline;
- The grant is used for the acquisition of real estate and related costs;
- Projects must demonstrate they will grow the state’s economy, support high-quality job creation, catalyze investment, and foster vibrant, healthy, inclusive community development;
- For projects with construction exceeding \$2,000 prevailing wages must be paid;
- The proposed project must demonstrate financial viability with The NJEDA’s assistance;

- Be for the development of commercial real estate or mixed-used project;
- The acquisition shall not exceed 120% of the appraised value;
- The project should meet an established and defined community need;
- Projects must be prudent and reasonable as defined by CRF §200.404;
- Projects should ensure there are no duplication of benefits for a government entity, business, or other entity;
- The NJEDA will only purchase properties in which relocation of tenants is not required;
- Properties and projects should meet the criteria outlined in section B. Fund Purpose and Strategy outlined above.
- Staff will review properties and projects on a rolling basis and make recommendations to the board based on the guidelines above and funds available;
- No funds will be granted to third parties including local or state government, private businesses, associations, not-for-profits, or individuals.

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	September 1, 2025
Kick-Off Meeting	September 8, 2025

Key Milestone:	Date:
IOM Information Request	September 15, 2025
Obtain Requested Information	September 22, 2025
Draft Quarterly Report Preparation	September 24, 2025
Draft Quarterly Report Submission	September 29, 2025
Interviews of Authority Stakeholders	October 2, 2025
Conduct Quarterly Compliance Testing	October 2, 2025 – December 15, 2025
Draft Quarterly Report Preparation	December 22, 2025
Draft Quarterly Report Submission	December 29, 2025
Conduct Quarterly Compliance Testing	January 5, 2026 – March 16, 2026
Draft Quarterly Report Preparation	March 23, 2026
Draft Quarterly Report Submission	March 30, 2026
Conduct Quarterly Compliance Testing	April 1, 2026 – June 15, 2026
Draft Quarterly Report Preparation	June 22, 2026
Draft Quarterly Report Submission	June 30, 2026
Conduct Quarterly Compliance Testing	July 6, 2026 – September 15, 2026
Draft Quarterly Report Preparation	September 21, 2026
Draft Quarterly Report Submission	September 30, 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 Fund 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-three (23) eligible expenses (minimum of \$1 million per expense) of the Fund. K2 Integrity's total budget for this TOR is not-to-exceed \$89,750.

Appendix 1 – Vendor Response Form

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

TASK ORDER REQUEST # 144-16

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 Integrity LLC		
PROJECT SUMMARY	Property Assemblage Fund		
COVID-19 Recovery Programs valued at \$20 million or more	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
STANDARDIZED POSITIONS/TITLES	HOURLY RATES	NUMBER OF HOURS	PRICE
Senior Executive / Manager	\$340	11	\$3,740
Mid-Level Manager	\$290	179	\$51,910
Low-level (or similar title)	\$220	155	\$34,100
Administrative/Support Staff			
TOTAL PRICE			\$89,750
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: [REDACTED]			

Respectfully submitted,

K2 Integrity LLC _____
Name of Firm

Bradley Sussman _____
Name of Individual



Signature & Title

09/07/25 _____
Date



**NEW JERSEY ECONOMIC DEVELOPMENT AUTHORITY
TASK ORDER REQUEST
CONFLICT OF INTEREST CERTIFICATION STATEMENT
[Reference RFP #2022-RFP-144 (TOR-16)]**

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-16) Property Assemblage Fund
RFP # *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
8/27/2025
Date

Bradley Sussman
Vendor Contract Manager Name

Vendor Contract Manager Signature

Senior Managing Director
Title
8/27/2025
Date