

**Office of the Inspector General  
Response  
Case # 22-0030-I**



OFFICE OF THE INSPECTOR GENERAL  
Isabel Mercedes Cumming, Inspector General  
City Hall, Suite 635  
100 N. Holliday Street  
Baltimore, MD 21202



November 19, 2024

**The Office of the Inspector General's Response to  
the Mayor's Office of Neighborhood Safety and Engagement  
and the Department of Audits**

On September 11, 2024, the Office of the Inspector General (OIG) issued a Management Alert for OIG Case #22-0030-I. On September 25, 2024, the OIG received responses to its management alert from the Mayor's Office of Neighborhood Safety and Engagement (MONSE) and the Department of Audits (Audits). The OIG continued its investigation and sought to confirm that no fictitious employees received payment and gathered more information on the contract approval process.

**Safe Streets Payroll Review**

The OIG confirmed with MONSE that Safe Streets Community-Based Organizations (CBOs) do not receive the contract funds as an upfront lump sum. Instead, the CBOs are reimbursed for their expenses. Safe Streets CBOs are responsible for providing MONSE with documentation of their expenses, including their employee payroll.

MONSE provided the OIG with multiple years of CBO invoice and payroll documentation. The OIG reviewed Safe Streets CBO payroll information for Fiscal Years (FY) 2022, 2023, and 2024. The investigation found no evidence to support that MONSE paid CBOs for the fictitious employee listed on those FY contracts that were presented to the BOE.

**MONSE**

The OIG interviewed multiple current and former MONSE employees (MONSE Employees) regarding the fictitious names that were entered on Board of Estimates (BOE) documentation. They explained that Audits' approval was part of the BOE contract approval process.

According to the MONSE employees, Audits required that all contracts contain actual employee names and would disapprove if a position was listed as vacant or "TBD." The MONSE employees said they explained this requirement to the CBOs, and fake names were included in the contract budget documents. The OIG found evidence suggesting the potential use of fake names may have occurred as far back as 2020.

MONSE stated the CBOs are required to submit invoices that include supporting documentation of all expenses, including payroll information. MONSE employees said MONSE reviews the invoices and supporting documentation before approving payment.

**Audits**

The OIG learned that the Department of Audits' (Audits) Pre-Audits division reviews contracts for the BOE approval process. A Pre-Audits employee (Pre-Audits Employee) said they review prospective contracts for compliance and use an internal Pre-Audit checklist. They explained that a former Audits

manager would not allow for names on contract budgets to be vacant.

The Pre-Audits Employee stated that they have never told an agency to include a fictitious name on a contract. They added that it is difficult to determine if the names on the contract budgets are real unless they are the names of famous people. No personal identifiable information (PII) is included with the names on the contract budgets.

Audits said that Pre-Audits stopped requiring employee names in the contract budget to receive approval within the last year. Audits also stated that the Pre-Audit Division was transferred to the Office of the Comptroller's Chief of Staff in approximately March 2024.

### **Safe Streets Community-Based Organization 1 (CBO 1)**

A Safe Streets CBO executive (CBO 1 Executive) explained that they were aware that fictitious employee names were submitted for BOE approval. The CBO 1 Executive explained that the contract could not be approved without including employee names. The CBO 1 Executive said they have voiced their concern about this process, and MONSE employees told them that "any name can be listed." The CBO 1 Executive explained that they submitted names that would be obviously fictitious. Moreover, they added that CBO 1 did not receive any money for fictitious employees. CBO 1 submitted monthly invoices with payroll information to MONSE for payment.

The CBO 1 Executive further explained that they often did not fill all the staff positions because the CBOs could not bill for payment until the BOE approved the contract. CBO 1 would administer the Safe Streets program without a contract and without payment.

### **Safe Streets Community-Based Organization 2 (CBO 2)**

An executive (CBO 2 Executive) from another Safe Streets CBO (CBO 2) stated that CBO 2 would submit accurate budget personnel information to MONSE with "TBD" or "vacant" listed if a position was not filled. The CBO 2 Executive said that MONSE employees instructed them to utilize fictitious names and added fake names themselves. The CBO 2 Executive added that CBO 2 did not receive any funds for fictitious employees, and the CBO 2 submits detailed invoices that include payroll information for MONSE to review.

### **Hospital Responder Contractor**

An executive from a hospital responder contractor (Hospital Responder Executive) explained that delays with the approval of the contract caused the Hospital Responder Contractor to perform work for MONSE without a contract. Without a contract, vendors cannot be paid. The Hospital Responder Executive said that they were only comfortable filling half of the budgeted positions without a contract, so half of the budgeted six (6) positions were vacant.

The Hospital Responder Executive alleged that a former MONSE executive said the contract would not be approved without employee names. The Hospital Responder Executive suggested the names "John Doe" and "Jane Doe", which MONSE rejected. According to the Hospital Responder Executive, fictitious names were used at MONSE's request, but they were uncomfortable with it.

#### **REPORT FRAUD, WASTE AND ABUSE**

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*This public synopsis is only a summary of a more comprehensive report of investigation submitted to the appropriate City management official*

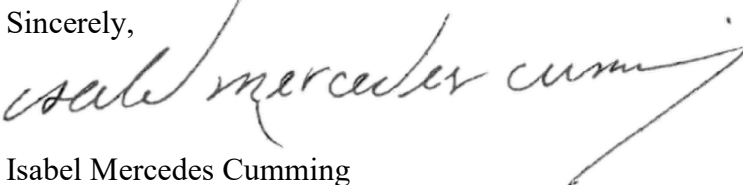
## Summary

The OIG confirmed that the CBOs do not receive the lump-sum contract amount upfront. It is paid on a reimbursement basis after the CBOs invoice MONSE and provide expense and payroll documentation. The investigation found no evidence that MONSE funds were used to pay for the fictitious employees listed in the FY 2022 to 2024 contract documents that were presented to the Board of Estimates. Witnesses indicated there have been improvements to the City's management of the contracts under the current MONSE director.

The OIG found it noteworthy that the Pre-Audits practice of requiring names in contracts is no longer occurring, especially since the CBOs do not receive the funds upfront. The OIG stresses the importance of providing factual information in official government documents, as not doing so could be a violation of the Maryland Annotated Code concerning making false entries on public records.<sup>1</sup>

The OIG recommends that agencies review prior approved contracts and invoices to verify documentation for potentially fictitious information. Furthermore, the OIG recommends that MONSE work to ensure timelier contract execution on future contracts, as vendors completing work without an executed contract exposes both the City and its vendors to risk.

Sincerely,

  
Isabel Mercedes Cumming  
Inspector General

CC: Hon. Brandon M. Scott, Mayor of Baltimore City  
Hon. Nick Mosby, Baltimore City Council President  
Hon. Bill Henry, Baltimore City Comptroller  
Honorable Members of the Baltimore City Council  
Hon. Ebony Thompson, Baltimore City Solicitor  
Stefanie Mavronis, MONSE Director  
Josh Pasch, City Auditor

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<sup>1</sup> <https://mgaleg.maryland.gov/mgaweb/website/laws/StatuteText?article=gcr&section=8-606&enactments=false>