

**OFFICE OF THE INSPECTOR GENERAL**  
**CITY OF BALTIMORE**



**Isabel Mercedes Cumming**  
**Inspector General**

**Investigative**  
**Report Synopsis**

OIG Case #22-0030-I

Issued: November 19, 2024



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



November 19, 2024

Dear Citizens of Baltimore City,

The mission of the Office of the Inspector General (OIG) is to promote accountability, efficiency, and integrity in City government, as well as to investigate complaints of fraud, financial waste, and abuse. The following synopsis is a condensed version of a complaint presented to the OIG and the actions taken by City of Baltimore (City) management officials.

The OIG received numerous complaints regarding the Safe Streets program and learned that MONSE and their contractors included fictitious employees on the Board of Estimates (BOE) contract approval documentation.

### **Background**

MONSE is responsible for implementing the City's public health approach to safety through the Comprehensive Violence Prevention Plan. Since its inception in 2007, Safe Streets has changed its program oversight from the Baltimore City Health Department to the Mayor's Office of Criminal Justice (MOCJ) and then to MONSE in 2020. Safe Streets partners with Community-based organizations (CBOs) to develop and implement strategies to reduce and prevent violence, particularly shootings and killings. Currently, Safe Streets has ten (10) sites that serve the residents in designated zones across the City. These ten (10) Safe Streets sites collectively cover a total 2.6 square miles in the City. The City has approximately 80 square miles in land area. In Fiscal Year (FY) 2022 (FY22), there were eight (8) CBOs administering the ten sites. Currently, two CBOs administer the 10 Safe Streets sites.

The City's FY22 began on July 1, 2021, and ended on June 30, 2022. The CBOs receive payment from the City on a reimbursement basis and do not receive the contract award money upfront. They must submit invoices showing their expenses and payroll information before receiving payment.

The BOE is responsible for awarding contracts and supervising all purchasing by the City and consists of five voting members: The Mayor, the President of the City Council, the Comptroller, the City Solicitor, and the Director of Public Works. As a part of the BOE contract approval process, the Department of Audits (Audits) is responsible for reviewing grant awards and sub-grantee awards, change orders, or proposals submitted by agencies to the BOE to verify compliance with city policies.

### **FY22 VIPP Hospital Responder Contract Communications**

In June 2022, MONSE was working to finalize a Hospital Responder Contractor's (Hospital Contractor) FY22 contract to pay the invoices that were incurred from July 1, 2021, to June 2022. MONSE was in the process of getting the FY22 contract approved in the final few weeks of the fiscal year. It appears that the Hospital Contractor had been performing work without an executed contract.

On June 6, 2022, a MONSE employee (MONSE Employee 1) notified several Hospital Contractor

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

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employees that they had received feedback regarding Audits' review of the FY22 VIPP Hospital Responder Contract. MONSE Employee 1 stated they needed Contractor 1 to include an employee name for a vacant hospital responder position. The Hospital Contractor replied that they wanted to hire a candidate to fill that role but did not receive any other applicants from MONSE or staff at the site. Later that day, MONSE Employee 1 informed Contractor 1 that "off the record, neither MONSE nor the audits team will verify the individual, so we really just need a name that doesn't sound fictional. If we remove the position, we will need to revamp the budget and time is of the essence".

The Hospital Contractor provided MONSE Employee 1 with a potential name that was entered for the vacant position. The BOE then approved the contract with the updated name included as a hospital responder with a budgeted salary of \$37,850. The OIG reviewed the Hospital Contractor's invoices in Workday, the City's financial and human resource management system, but they did not contain employee payroll information and supporting documentation.

### **FY22 Safe Streets Contracts**

The OIG reviewed multiple FY22 Safe Streets contracts that contained email correspondence regarding vacant positions and inputting "made up" employee names:

- 1) Safe Streets Contractor 1 – A second MONSE employee (MONSE Employee 2) contacted Safe Streets Contractor 1 and discussed their proposed FY22 budget. MONSE Employee 2 requested that Safe Streets Contractor 1 "enter names in the vacant positions. They can be made up, they just cannot be position titles alone or empty".
- 2) Safe Streets Contractor 2 - MONSE Employee 2 requested for Safe Streets Contractor 2's proposed FY22 budget that they "enter names in the vacant positions. They can be made up, they just cannot be position titles alone or empty." Safe Streets Contractor 2 then returned the contract with two (2) names in the vacant positions. The budgeted salary amounts for the 2 names in the executed contract were left blank.
- 3) Safe Streets Contractor 3 – An Audits employee (Audits Employee 1) returned Safe Streets Contractor 3's FY22 contract budget to MONSE Employee 1 in February 2022 and stated they could not accept an agreement with vacant positions on salary and budget pages. Additionally, the Audits Employee noted that the contract began on July 1, 2021, leaving time to fill the positions. MONSE Employee 1 replied approximately two weeks later with an updated budget. Two employee names were added with a combined budgeted salary of \$46,666.66 in the executed contract.

### **FY23 Safe Streets Contract Communications**

The OIG reviewed correspondence between personnel from MONSE, another Safe Streets Contractor (Safe Streets Contractor 4), and Audits that discussed including employee names in the BOE contract documentation:

- On October 5<sup>th</sup>, 2022, at 11:42 a.m. MONSE Employee 1 received an email from an Audits employee (Audits Employee 2). In that email, Audits Employee 2 requested that Safe Streets

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Contractor 4’s budget information be updated to include employee names instead of “TBD”.

- At 12:41 p.m. MONSE Employee 1 emailed Safe Streets Contractor 4 detailing Audits Employee 2’s request concerning the FY23 contract budget for two (2) sites. MONSE Employee 1 told Safe Streets Contractor 4 that Audits would not approve the contract with “TBH”<sup>1</sup> in the employee names field. MONSE Employee 1 also said, “Any name can be listed as long as it isn’t the repeat of another staff member.”
- At 2:27 p.m., Safe Streets Contractor 4 sent an email to MONSE Employee 1 with the updated contract budgets and the names for each position.
- At 2:53 p.m. MONSE Employee 1 emailed Audits Employee 2 with the updated contract information that they received from Safe Streets Contractor 4.

BOE documentation shows that Audits approved the contracts for the two (2) sites in October 2022. The updated budget information replaced “TBD” with names believed to be fictitious. The BOE approved the contract with those names in November 2022.

**Review of Possible Fictitious Names**

The OIG conducted a review of CBO employees listed on BOE approval documentation. Personal identifiable information (PII) is not included in the contract documents due to privacy reasons. The OIG identified 26 potentially fictitious employee names listed on the BOE approval documentation. Utilizing various investigative methods to verify the existence of these listed employees, the OIG did not find any relevant results for nine (9) employees. Those nine employees were budgeted for \$285,000 over various contracts. Some of the nine employees unable to be verified are listed in Table 1 below.

*Table 1: List of employee names without records to support existence*

<b>Employee Name</b>	<b>Contract Year</b>	<b>Budgeted Position</b>	<b>Budgeted Salary</b>
Allen Iverson	FY22	Violence Prevention Coordinator	\$45,000
Joseph Bynes II	FY23	Violence Interrupter	\$30,000
Lemur Jackson II	FY23	Violence Interrupter	\$31,667
Merlin Humphrey II	FY23	Violence Interrupter	\$33,333
Rodney Bateman II	FY23	Violence Interrupter	\$31,667
Susanne Smith II	FY23-25	Site Supervisor	\$12,500*
Troy Smith II	FY23-FY25	Lead Violence Interrupter	\$11,250*

*\*Total Budgeted for FY23 only*

The investigative search methods yielded results for the 17 other names reviewed, but some results do not show these individuals residing in the Baltimore area. The OIG reviewed the available Safe Streets invoice documentation and did not see any of the 26 employee names listed in the CBO’s request for payment. It is important to note that some of the invoices in Workday did not contain supporting documentation with employee names.

<sup>1</sup>This could be inferred to mean “to be hired.”

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## **Review of FY22 Budgets, Available Invoices, and BOE Approval Dates**

Based on the available financial records for FY22, only one (1) Safe Streets site appeared to exceed its initially budgeted salary line item. That site exceeded its salary line item but was only funded for six months and underspent its total overall budget amount.

The FY22 contracts were all approved by the BOE approximately eight (8) to nine (9) months after their start date. It is worth noting that the City appeared to receive the State of Maryland's official approval letter for the grant award in June 2021, shortly before the contract performance period began.

*Table 2: Site's contract start, end, and BOE approval dates*

<u>Site</u>	<u>Start Date</u>	<u>End Date</u>	<u>BOE Approval Date</u>
Belair-Edison	7/1/2021	6/30/2022	3/16/2022
Belvedere	7/1/2021	6/30/2022	4/6/2022
Brooklyn	7/1/2021	6/30/2022	3/16/2022
Cherry Hill	7/1/2021	6/30/2022	4/6/2022
Franklin Square	7/1/2021	6/30/2022	4/6/2022
McElderry	7/1/2021	6/30/2022	4/6/2022
Park Heights	7/1/2021	6/30/2022	3/16/22
Penn North	7/1/2021	6/30/2022	3/16/2022
Sandtown	7/1/2021	6/30/2022	3/16/2022
Woodborne-McCabe	7/1/2021	12/31/2021	3/2/2022
FY 23 Brooklyn/Sandtown	7/1/2022	6/30/2023	11/16/2022
FY 23 - FY 25 Brooklyn/Sandtown	7/1/2022	6/30/2025	6/28/2023

## **Investigative Findings**

MONSE employees sent multiple emails to contractors that appeared to encourage the use of fake employee names for contracts submitted and later approved by the BOE. The OIG identified 26 names that may not be valid. The investigation could not find any relevant records to support the existence of nine (9) employee names. The OIG turned the information found over to law enforcement for potential further investigation.

Based on the evidence gathered and the difficulty of verifying employee authenticity without PII for the potentially fictitious employees, the OIG requested that MONSE review the entire list of employees listed in the contract budgets and verify their authenticity with the contractors.

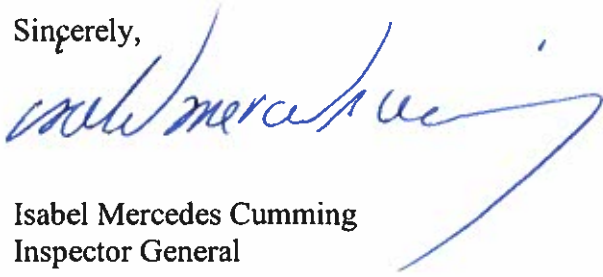
Further, the OIG recommended that MONSE and Audits meet to review the best practice for submitting contracts to the BOE when vacant positions are present.

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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

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**Office of the Comptroller  
Department of Audits  
Response  
Case # 22-0030-I**

<b>FROM</b>	<b>Name &amp; Title</b>	Josh Pasch City Auditor 	<b>CITY of BALTIMORE</b>  <b>MEMO</b>  410-396-4783	
	<b>Agency Name &amp; Address</b>	Department of Audits 100 N. Holliday St. Baltimore MD 21202		
	<b>Subject</b>	OIG Case #22-0030-I		

**DATE:** September 25, 2024

**TO:** Isabel Mercedes Cumming  
Inspector General  
Office of the Inspector General  
100 N. Holliday Street, Suite 635  
Baltimore, MD 21202

We are in receipt of Management Alert OIG Case 22-0030-I. Our response is as follows.

We agree that the Department of Audits (Audits), Pre-Audits division is responsible for reviewing grant award and sub-grantee awards submitted to the BOE. Effective April 2024, the Pre-Audits division was transferred from Audits to the Office of the Comptroller, reporting to the Chief of Staff.

We agree that the Pre-Audits division did request that the contract budget list employee names for all positions including when TBD or vacant or position titles alone were listed on the budget. This requirement was changed (I believe in the last year) and now accepts position titles in the budget without employee names. Audits met with the Office of the Comptroller to discuss how to make sure all agencies are aware of this change.

There was never any communication from Audits that the use of fake names as employees was acceptable.

We understand that a contract is a legal document. However, in my experience, it is not common to validate everyone who will be working on a contract before the contract is executed. Some exceptions may be subject matter experts – which does not appear to apply in these cases. The Audits, Pre-Audits division does not research and validate staff listed on vendor contracts.

It is not uncommon for a vendor to change staff working on a contract (e.g. employee turnover). The significant risk to the city would be paying for fictitious employees. This risk would be mitigated by reviewing invoices and auditing vendors.

**CC:** Honorable Bill Henry, City Comptroller  
Erika M. McClammy, JD. Deputy Comptroller  
M. Celeste Amato, Chief of Staff



**Mayor's Office of Neighborhood  
Safety and Engagement  
Response  
Case # 22-0030-I**



CITY OF BALTIMORE  
MAYOR BRANDON M. SCOTT

**M E M O R A N D U M**

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TO	Isabel Mercedes Cumming, Inspector General
FROM	Stefanie Mavronis, MONSE Director
DATE	Wednesday, September 25, 2024
SUBJECT	Management Alert #22-0030-I

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This memorandum will serve as an official response to the OIG Management Alert for case no. 22-0030-I. Upon review of the findings, the agency took immediate action to better understand the scope of the problem, conduct a detailed review of contracts and invoices, and take immediate accountability. To underscore the agency’s commitment to accountability and improving internal financial systems and contract oversight, immediate personnel changes were made to include termination and changes in employment responsibilities.

*Fiscal Review*

MONSE reviewed all invoices and contracting documentation associated with the grants referenced in the report. The agency also found no evidence that funds were paid to any of the fictitious names identified in the OIG report; however, we are committed to completing a thorough review of payroll and timesheet records to ensure that grant funds used to paid for salaries and personnel were appropriately used. Should the agency find evidence of financial mismanagement, we are prepared to work with the Law Department to recover these funds.

*Reforms to Grant Processes*

Employees names may be unavailable at the time of BOE submission due to positions being unfilled at the time of contract execution. Recently, the Comptroller’s Office changed their requirement to supply employee names prior to grant approval. The new policy allows MONSE and other city agencies to indicate “Vacant” or “Employee TBD” where there is an unfilled budgeted position. Agencies must collect information on filled positions from the contracted entity after contract execution.

[Click here to enter text.](#)

Additionally, MONSE is working to overhaul our grant management protocols. As part of our reform efforts, the agency will work with the Office of Grants Management in the Department of Finance to review our current policies and procedures, provide recommended updates to strengthen our internal controls, and enhance our sub-recipient monitoring efforts.

In closing, the Mayor's Office of Neighborhood Safety and Engagement (MONSE) is committed to improving internal financial systems, contracting oversight, and adherence to all City rules and guidelines. Over the past several months and prior to receiving this report, MONSE leadership had begun the work of realigning staffing and updating standard operating procedures to address identified challenges within the agency's finance function.

We thank you for your review and continued partnership. Please do not hesitate to contact us with any follow-up questions.

cc: Brandon M. Scott, Mayor  
Marvin James, Chief of Staff  
Faith Leach, Chief Administrative Officer  
Simone Johnson, Deputy Chief Administrative Officer  
Anthony Barksdale, Deputy Mayor of Public Safety  
Michael Moiseyev, Director of Finance  
Quinton Herbert, Director and Chief Human Capital Officer

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



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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.

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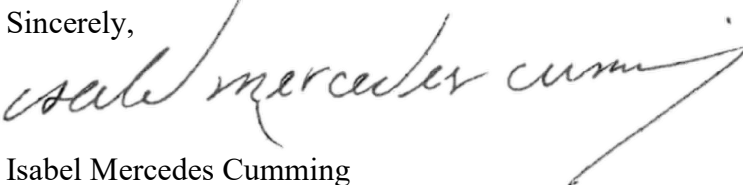
## Summary

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/site/laws/StatuteText?article=gcr&section=8-606&enactments=false>