

**State of New Jersey**  
**Department of Treasury**  
**Integrity Monitoring Reporting Model**  
**For Quarter Ending 12/31/2014**

Reports required under A-60 will be submitted by Integrity Monitors on the first business day of each calendar quarter to the State Treasurer and will contain detailed information on the projects/contracts/programs funded by the Disaster Relief Appropriations Act.

| No. | Recipient Data Elements                  | Response  | Comments |
|-----|--|---|----------|
| A.  | General Info                             |   |          |
| 1.  | Recipient of funding                     | <p>The New Jersey Department of Community Affairs ("DCA"), Sandy Recovery Division ("SRD"), is the direct recipient of funding from the United States Department of Housing and Urban Development ("HUD"), Community Development Block Grant, Disaster Recovery Program ("CDBG-DR") to address the massive property damage inflicted by Superstorm Sandy. DCA retained several contractors, who fall under the purview of the New Jersey Integrity Oversight Monitor Act ("A-60"), to assist it in managing various programs designed to distribute CDBG-DR funds to eligible New Jersey residents and businesses. These contractors include the Gilbane Building Company ("Gilbane"), CB&amp;I Shaw ("CB&amp;I"), and the URS Group, which were retained to manage the Rehabilitation, Reconstruction, Elevation and Mitigation Program ("RREM"); Gilbane, which was retained to manage the Landlord Rental Repair Program ("LRRP"); CGI Federal ("CGI"), which was retained to create and manage the Sandy Integrated Recovery Operations and Management System ("SIROMS"), an information technology solution to assist DCA in managing its SRD programs; Hammerman &amp; Gainer ("HGI"), which was retained to manage the housing application process for the SRD's various housing programs; ICF, Inc., which was retained to provide subject matter expertise and staffing augmentation services to DCA; and Cohn Reznick, which was retained to serve as DCA's internal integrity monitor.</p> |          |
| 2.  | Federal Funding Agency? (e.g. HUD, FEMA) | HUD   |          |
| 3.  | State Funding (if applicable)            | None  |          |
| 4.  | Award Type                               | HUD CDBG-DR Award   |          |
| 5.  | Award Amount                             | <p><b>Gilbane (RREM): \$27,781,951; Gilbane (LRRP): \$6,449,691</b><br/> <b>CB&amp;I/Shaw: \$24,425,557</b><br/> <b>CGI: \$45,230,816</b><br/> <b>ICF: \$54,787,946</b><br/> <b>URS: \$20,096,853</b><br/> <b>HGI: \$67,739,989</b><br/> <b>Cohn Reznick: \$9,992,683</b></p>   |          |
| 6.  | Contract/Program Person/Title            | <p><b>RREM and LRRP:</b> Stephen Grady, Assistant Director, Housing Recovery Programs, DCA<br/> <b>SIROMS and Sandy Grant Manager Module ("SGM"):</b> Linda Torres, Contract Manager, DCA Information Technology Director<br/> <b>ICF:</b> Elizabeth McCay, Contract Manager, DCA<br/> <b>Cohn Reznick:</b> Robert Bartolone, Director, Office of Auditing, DCA</p>   |          |

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| 7.  | Brief Description, Purpose and Rationale of Project/Program | <p><b>RREM</b> provides CDBG-DR awards of up to \$150,000 to eligible homeowners to restore homes damaged by Superstorm Sandy.</p> <p><b>LRRP</b> provides CDBG-DR awards of up to \$50,000 per unit to owners of rental properties with between 1 and 25 units that require rehabilitation as a result of Superstorm Sandy.</p> <p><b>SIROMS</b>, developed and administered by CGI, manages all of DCA's Superstorm Sandy funding requests from State agencies, local governments and school districts, as well as all HUD reporting obligations.</p> <p><b>SGM</b>, a grant tracking system, was developed by CGI. It has replaced the eGrant system developed by HGI.</p> <p><b>ICF</b> provides strategic advice, program implementation, subject matter expertise and staff augmentation services to DCA.</p> <p><b>Superstorm Sandy Housing Incentive Program ("SSHIP")</b> covered the completion and processing of housing program applications, and the determination of eligibility and disbursement of funds under the Resettlement Incentive Program, and the RREM and LRRP Programs. HGI was the original contractor selected to manage SSHIP, but prior to the beginning of Navigant's monitorship, DCA and HGI, by mutual agreement, terminated HGI's role as the SSHIP contractor. HGI's performance under the contract is currently the subject of an arbitration proceeding. The New Jersey Attorney General's Office represents the State in that proceeding. DCA assumed responsibility over HGI's duties at the Superstorm Sandy Housing Recovery Centers, and CGI assumed responsibility for migrating applicant data from HGI's eGrants system to CGI's SGM system. CGI has completed the migration of data from eGrants to SGM, and is managing the data for the RREM and LRRP programs going forward.</p> |          |
| 8.  | Contract/Program Location                                   | Trenton, New Jersey   |          |
| 9.  | Amount Expended to Date                                     | <p>Amounts are based on current invoice totals as of December 31, 2014:</p> <p><b>Gilbane (RREM):</b> \$26,799,378; <b>Gilbane (LRRP):</b> \$5,003,271</p> <p><b>CB&amp;I/Shaw:</b> \$15,474,560</p> <p><b>CGI Federal:</b> \$28,048,059</p> <p><b>ICF:</b> \$26,383,791</p> <p><b>URS:</b> \$5,543,381</p> <p><b>HGI:</b> \$35,910,449</p> <p><b>Cohn Reznick:</b> \$7,863,540</p>   |          |
| 10. | Amount Provided to other State or Local Entities            | N/A   |          |
| 11. | Completion Status of Contract or Program                    | <p>Completion Status based on contract values and invoiced amounts as of December 31, 2014:</p> <p><b>RREM (Gilbane/CB&amp;I Shaw/URS):</b> approximately 66%</p> <p><b>LRRP (Gilbane):</b> approximately 78%</p> <p><b>SIROMS/SGM (CGI):</b> approximately 62%</p> <p><b>ICF:</b> approximately 48%</p> <p><b>Cohn Reznick:</b> approximately 79%</p>  |          |

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| 12.                             | Expected Contract End Date/Time Period  | <b>RREM (Gilbane &amp; CB&amp;I Shaw):</b> May 22, 2016<br><b>LRRP (Gilbane):</b> June 30, 2016<br><b>CGI:</b> May 24, 2015<br><b>ICF:</b> May 24, 2015<br><b>Cohn Reznick:</b> May 13, 2015   |          |
| <b>B. Monitoring Activities</b> |   |  |          |
| 13.                             | If FEMA funded, brief description of the status of the project worksheet and its support.   | N/A  |          |
| 14.                             | Quarterly Activities/Project Description (include number of visits to meet with recipient and sub recipient, including who you met with, and any site visits warranted to where work was completed) | Navigant's integrity oversight monitoring activity for the third full Quarter of our monitorship focused principally on four areas: reviewing the invoices of the two RREM Contractors, Gilbane and CB&I ("the Contractors"), and their numerous subcontractors; attending and observing homeowner and Contractor meetings and inspections, and providing feedback to DCA and the Contractors; designing and commencing two comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and investigating and making referrals to the Sandy Fraud Task Force regarding RREM and LRRP files we examined that raised fraud concerns. During this quarter, we conducted fifty-four (54) meetings with DCA, Cohn Reznick, CB&I, Gilbane, CGI, ICF, RREM applicants and officials from the Department of the Treasury, the Office of the Attorney General, the Office of the Comptroller, and the Office of the Inspector General for HUD ( see Appendix A for a list of government officials and Contractor staff with whom we had in-person or telephonic meetings). |          |

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|     |                         | <p><b>Invoice Review</b></p> <p>Throughout the Quarter, we continued reviewing the RREM Contractor invoices and their subcontractor invoices, and updated our invoice database to compile relevant invoice details for further analysis. This database will enable us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders, and conduct additional invoice analytics based on the RREM and LRRP application numbers and other key information and underlying source documents.</p> <p>We updated our independent invoice review procedures after reviewing a selection of invoices submitted to DCA by the Contractors on behalf of their subcontractors to obtain an understanding of the services the subcontractors provided, and the nature and extent of the details reflected in their invoices. We also discussed with the Contractors' project managers and accountants the nature of the services provided by their subcontractors, as well as the Contractors' review and approval processes for subcontractor invoices prior to their being submitted to DCA. We requested that the Contractors provide additional information and documentation for their subcontractors' invoices, such as missing supporting documentation for invoiced costs billed on a time-and-materials basis, and any updated subcontractor agreements or purchase orders to reconcile the billed unit costs and total costs. We also reviewed a sample selection of hazardous material ("hazmat") reports (e.g., lead and asbestos surveys) to verify the amounts and details recorded in the subcontractor invoices, and interviewed the Contractors regarding how they assigned the various subcontractors to conduct hazmat testing at applicant homes. Finally, we ensured that our invoice analysis was guided by our investigative due diligence findings regarding certain of the subcontractors referenced in our last Quarterly Report.</p> <p>The invoice analysis we conducted during the Quarter identified potential issues that require additional documentation from the subcontractors to resolve, such as multiple billing for hazmat testing services at the same home, billing based on time and materials without supporting documentation, the use of invoiced unit rates that did not appear on the subcontractor agreements or purchase orders, and various one-off mathematical errors. To complete this analysis, during the next Quarter we will be examining additional back-up documentation from the subcontractors which we had not yet received as of the end of this Quarter.</p> |          |

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|     |                         | <p>The issues we have identified may not ultimately require any invoice adjustments. For example, regarding multiple billings for hazmat assessments, we have been told that there was a legitimate need to sometimes utilize multiple hazmat subcontractors to complete an assessment on a single home because some hazmat inspectors were not dual certified in asbestos and lead testing. As a result, there were occasions when an asbestos inspector from one subcontractor and a lead inspector from a different subcontractor performed inspections on the same home with a third subcontractor performing the laboratory tests. Similarly, one of the Contractors (CB&amp;I) advised us that they sometimes utilized their own appropriately certified employees to conduct hazmat assessments and then submitted the samples to a subcontractor to perform the lab testing. When we obtain all of the necessary documentation from the subcontractors, we will be able to determine, among other things, whether or not there were any instances when, for example, multiple subcontractors billed for providing the same services for the same home or other similar instances of over-billing.</p> <p>Regarding time and materials billing, we have identified one hazmat subcontractor who initially worked on a time-and-materials basis and was then switched to unit pricing. Based on our analysis during this Quarter, we have identified time-and-materials billings from this subcontractor totaling \$1,477,292. The subcontractor did not provide any documentation to support these time-and-materials invoices. We have requested, but had not received as of the end of the Quarter, supporting documentation for these invoices. We have been assured, however, that documentation will be provided. When it is provided, we will determine whether the invoices are accurate and properly supported.</p> <p>Regarding unit rates, based on our review of a random sample of hazmat reports, we confirmed that the type of materials and quantities recorded in the subcontractor invoices accurately corresponded to the information recorded in the hazmat reports. We found some instances, however, when the invoiced unit rates either were different from the authorized rates in the subcontractor agreements or purchase orders, or not reflected in those agreements or purchase orders. When we advised CB&amp;I of this, it examined the invoices in question and acknowledged that its current purchase orders with their subcontractors did not reflect all of the services the subcontractors were providing, and it pledged to update its subcontractor purchase orders to include unit prices for all services being provided and invoiced by its subcontractors. We identified similar instances with Gilbane subcontractor invoices and were advised that amended agreements existed and would be provided. When we receive these documents, we will review them to ensure that any invoiced unit rates in subcontractor invoices were properly approved and reasonable.</p> |          |

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|     |                         | <p><b>Meetings and Inspections</b></p> <p>During the Quarter, we reviewed relevant documentation available on SIROMS, conducted site visits and attended a total of twenty-one (21) meetings with RREM applicants and various RREM Program parties, including Housing Advisors and Contractors. The meetings consisted of Grant Award Signings, 5A Meetings, Payment Request Meetings and Final Inspections. With the exceptions discussed below, the meetings were organized and generally consistent across the different Housing Advisors and the two RREM Contractors. The documentation provided to the applicants at the meetings was generally consistent and included the most current documentation available on SIROMS. We met with DCA following these meetings to review our observations and concerns, and then spoke to each Contractor (Gilbane and CB&amp;I) to communicate our observations and concerns. It was evident that the concerns we communicated to the Contractors were then communicated to the Contractors' staff because we observed at subsequent meetings we attended an improvement in consistency as the Quarter progressed.</p> <p>Prior to attending the meetings, we reviewed each applicant's current workflow status and supporting documentation available within SIROMS, including the Grant Award Calculation ("GAC"), Work-in-Place Estimates ("WIP"), Estimated Cost to Repair ("ECR") and Reimbursement Requests, among other documents. The meetings were held at multiple locations, including the applicant's damaged home, the applicant's temporary residence, and the Housing Recovery Centers ("HRC") located within each county.</p> <p>The only meetings we attended where we found inconsistency between how the two RREM Contractors conducted the meetings were 5A meetings. These meetings included the applicant and a Contractor's representative, and focused on the documentation required to transition the applicant from the grant award phase to the construction phase of the RREM program. During each meeting, the Contractor's representative ensured that each applicant had an opportunity to review the GAC, WIP and ECR prior to the meeting. The Contractor's representative briefly described the paperwork and the applicant signed the required documents.</p> <p>We observed at these meetings, however, inconsistency between the two Contractors in their 5A Meeting format and the information they conveyed; multiple instances where one Contractor advised applicants to pre-sign documents prior to their completion in anticipation of future information being provided by the applicant to the Contractor's representative so he could enter the information into the pre-signed document (thereby saving time); certain ECR's that included work that had already been completed (and thus should have been classified as WIP); and an occasional failure to provide Fraud Hotline paperwork to the applicants for posting at their damaged properties.</p> <p>We communicated these concerns to DCA and the Contractors, and over the course of the Quarter, we observed through attendance at subsequent meetings that each of our concerns were addressed appropriately.</p> |          |

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|     |                         | <p><b>Technical Electronic Analyses</b></p> <p>During the Quarter, Navigant also designed and commenced two comprehensive technical analyses to identify potentially problematic RREM applications for further review using data extracts received from CGI.</p> <p>In the first analysis, Navigant performed a targeted search to identify RREM applications with unexpected responses to specific questions in the original intake application relating to preliminary program eligibility. Specifically, Navigant sought to identify RREM applications in which:</p> <ol style="list-style-type: none"> <li>1. The applicant responded “no” or provided no answer within the intake application to the question: Was the property damaged by Superstorm Sandy?</li> <li>2. The applicant responded “yes” or provided no answer within the intake application to the question: Has the property been foreclosed?</li> <li>3. The applicant responded “no” or provided no answer within the intake application to the question: Did you register for FEMA for assistance for damage caused by Superstorm Sandy?</li> <li>4. The applicant responded “no” or provided no answer within the intake application to the question: Was your total household income less than \$250,000 at the time of the storm?</li> </ol> <p>Using extracts of the RREM application data received from CGI on November 18, 2014, Navigant identified 230 funded or waitlisted RREM applications in which at least one unexpected response to the questions listed above was present, reflecting the presence of an eligibility issue in each application at the intake stage. We are reviewing these 230 RREM applications to evaluate how the program tracked, addressed and resolved these eligibility issues, and to determine if adequate controls were in place to address the issues.</p> <p>In the second analysis, Navigant designed and commenced a detailed review of changes made to RREM application address fields. Using the SIROMS audit log data received from CGI on November 18, 2014, Navigant isolated changes made to the mailing address and damaged property address fields to identify the complete universe of RREM applications with any change made to the contents of these fields. Navigant identified all of the funded or waitlisted applications in which a change was recorded in the SIROMS audit log for at least one of the address fields of interest. We then ran the address field values recorded before and after each change through an algorithm that calculated the similarity between the contents of each field before and after each change. We are reviewing these changes to determine whether the changes were appropriate and accurately reflect the applicants' address information.</p> |          |

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| 15. | Brief Description to confirm appropriate data/information has been provided by recipient and what activities have been taken to review in relation to the project/contract/program. | Navigant obtained (1) from DCA invoice-related documentation and revised RREM Policies and Procedures; (2) from the Contractors, regular schedules of their planned RREM applicant meetings and inspections, and some, but not all, of the invoice-related documentation we requested; (3) from Cohn Reznick, their updated recommendations matrix and internal monitoring reports; and (4) from CGI, data extracts containing the historical RREM application structured data available at the time of the data migration, the current RREM application structured data available when the extract was prepared, and the current audit trail of changes made to the RREM application data available when the extract was prepared. This data and information was utilized in the investigations and analyses described in paragraph 14 above.  |          |
| 16. | Description of quarterly auditing activities that have been conducted to ensure procurement compliance with terms and conditions of the contracts and agreements.                   | As described in paragraph 14 above, during this Quarter, Navigant reviewed the invoices of the RREM Contractors and their subcontractors for billing irregularities; attended and observed homeowner and Contractor meetings and inspections to assess compliance with program policies, procedures and controls, and provided feedback to DCA and the Contractors; designed and commenced two comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and investigated and made referrals to the Sandy Fraud Task Force regarding RREM and LRRP files we examined that raised fraud concerns.   |          |
| 17. | Have payment requisitions in connection with the contract/program been reviewed? Please describe  | As described in paragraph 14 above, during this Quarter, Navigant continued reviewing the RREM Contractor invoices and their subcontractor invoices, and updated our invoice database to compile relevant invoice details for further analysis. This database will enable us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders, and conduct additional invoice analytics based on the RREM and LRRP application numbers and other key information and underlying source documents. Our review during the Quarter identified potential issues that require additional documentation to resolve, such as multiple billing for hazmat testing services at the same home, billing based on time and materials without supporting documentation, the use of invoiced unit rates that did not appear on the subcontractor agreements or purchase orders, and various one-off mathematical errors. To complete this analysis, we will be examining additional back-up documentation from the subcontractors which we had not yet received as of the end of the Quarter. |          |
| 18. | Description of quarterly activity to prevent and detect waste, fraud and abuse.   | As described in paragraph 14 above, all of Navigant's work this Quarter was designed to prevent and detect waste, fraud and abuse. Our review of the invoices of the RREM Contractors and their subcontractors sought to identify any instances of intentional or inadvertent overbilling by the Contractors and their subcontractors; our attendance at homeowner and RREM Contractor meetings and field inspections sought to identify any irregularities in the conduct of RREM meetings and inspections that might be in conflict with RREM program policies and procedures, or that might undermine the controls established for the program; our two technical electronic analyses of the universe of RREM applications sought to identify potentially problematic applications for further review using data extracts from SIROMS; and our investigation and referral to the Attorney General's Office of RREM and LRRP files we examined that raised fraud concerns sought to ensure that such files are evaluated by State law enforcement officials for appropriate investigation and disposition.  |          |



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| 19. | Provide details of any integrity issues/findings  | As explained in paragraphs 14 and 18 above, our review of the invoices of the RREM Contractors and their subcontractors identified potential billing issues that we will continue to review in the next Quarter after receipt of additional documentation from subcontractors; our attendance at homeowner and RREM Contractor meetings and field inspections identified irregularities in the conduct of RREM 5A meetings that we have brought to the attention of DCA and the Contractors and that appear to have been corrected; our two technical electronic analyses of the universe of RREM applications using data extracts from SIROMS have identified two pools of applications for further review, one for potential eligibility issues and the other for changes in the applicant's address; and our review and investigation of RREM and LRRP files identified certain files that raised fraud concerns, which we referred to the Sandy Fraud Task Force for further evaluation, investigation and disposition. |          |
| 20. | Provide details of any work quality or safety/environmental/historical preservation issue(s).   | N/A   |          |
| 21. | Provide details on any other items of note that have occurred in the past quarter               | N/A   |          |
| 22. | Provide details of any actions taken to remediate waste, fraud and abuse noted in past quarters | N/A   |          |

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| C. Miscellaneous |   |  |          |
| 23.              | Attach a list of hours and expenses incurred to perform your quarterly integrity monitoring review          | <b>For the Quarter Ending December 31, 2014:</b><br>Total hours incurred: 838.16 hours<br>Total fees incurred: \$230,494<br>Total expenses incurred: \$0 (none billed) |          |
| 24.              | Add any item, issue or comment not covered in previous sections but deemed pertinent to monitoring program. | N/A  |          |

Name of Integrity Monitor: Navigant Consulting Inc.  
 Name of Report Preparer: Richard T. Faughnan  
 Signature:   
 Date: April 1, 2015

**Appendix A  
Meetings Conducted  
For Quarter Ending 12/31/2014**

**I. Department of Community Affairs**

- A. Melissa Orsen Deputy Commissioner
- B. Timothy Cunningham Assistant Commissioner and Director of Disaster Recovery
- C. David Reiner Assistant Commissioner and Director of Disaster Recovery
- D. Sam Viavattine Deputy Director, Sandy Recovery Division
- E. Robert Bartolone Director, Office of Auditing
- F. Stephen P. Grady Assistant Director, Housing Recovery Programs
- G. Matthew Lyons Program Specialist, Sandy Recovery Division
- H. Jerry O'Brien Principal Fiscal Analyst

**II. Department of the Treasury**

- A. David Ridolfino Associate Deputy State Treasurer
- B. Peter Buckley Investigator
- C. Jeffrey Burns Investigator

**III. Office of the Attorney General**

- A. Christine Hoffman Deputy Attorney General

**IV. Office of the Comptroller**

- A. Richard O'Brien

**V. Cohn Reznick**

- A. Paul Raffensperger Principal
- B. Frank Banda Partner
- C. Dean Krogman Director
- D. Carolyn Newcomb Manager
- E. Steven Cohen Senior Consultant
- F. Jennifer Fink Senior Consultant

**Appendix A  
Meetings Conducted  
For Quarter Ending 12/31/2014**

**VI. ICF, Inc.**

- A. Al Blankenship Director
- B. Keivn Roddy Acting Director of Compliance and Monitoring

**VII. Gilbane Building Company**

- A. Robert Pumphrey Director, CAT Response (RREM Director)
- B. Samir Patel Project Executive
- C. Frank Ferraro Senior Project Manager
- D. Thomas Majkszak Financial Manager/Accountant
- E. Steven Eckerman Controller
- F. Robert Goldman Project Manager
- G. Maurice Dattoli Project Manager
- H. Russell Crosson Project Manager
- I. Carl Weaver Project Manager

**VIII. Shaw Environmental, Inc. (a CB&I Company)**

- A. Jo Carroll Program Manager
- B. Daniel Paetzold Deputy Project Manager
- C. Praveen Udtha Project Manager
- D. Susan Karpinski Project Controls Engineer
- E. Nina Gabbidon Project Manager
- F. Mary Ellen Evans Project Manager
- G. Megan Rodriguez Project Manager
- H. Sean Fenlon Project Manager
- I. Mary Sheehy Project Manager
- J. Szaritza Vasquez Project Manager

**IX. CGI Federal, Inc.**

- A. Nawfel Elalami Director

**Appendix A  
Meetings Conducted  
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B. William Richey Deputy Program Director

**X. HUD Office of the Inspector General**

A. Heather Yanello Assistant Special Agent in Charge, HUD OIG, Newark Field Office

B. Cary Rubinstein Special Agent in Charge, HUD OIG, Philadelphia Field Office

**XI. Housing Recovery Center Personnel**

A. Denise Henry HRC Manager

B. George Demand HRC Manager

C. Vincent Rospond HRC Manager

D. Mary Jane McQuaid Housing Advisor

E. Doug Mickiewicz Housing Advisor

F. John Salin Housing Advisor