



Monroe County Legislature

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February 11, 2024

Via Electronic Mail
U.S. Attorney Trini Ross
138 Delaware Ave.
Buffalo, NY 14202

Ms. Ross:

I am writing to your agency regarding alleged malfeasance in the disbursement of federal COVID relief funds by a non-for-profit organization called Community Resource Collaborative (hereinafter CRC) based in Monroe County, N.Y. (hereinafter County).

One fundamental question is why and how CRC was chosen to administer a \$7.2 million, four-year American Rescue Plan Act (hereinafter ARPA) grant. CRC completed registration with New York State as a non-for-profit agency in November 2022, and recorded less than \$50,000 in revenue that year (**Exhibit A-1, A-2, A-3**).¹ Its stated purpose is to “collectively and successively connect young people with the resources they need to move through their traumatic experiences to starting personal peace by addressing housing employment, mental health, and other services required to support basic human needs and continued personal growth and healing.”

In September of 2022, before they had completed registration with New York State, despite having no experience, or any clear demonstrated ability to perform, CRC was inexplicably selected by the County to serve as a fiscal agent, and pass-through for a collection of 13 organizations performing vital frontline work such as providing food, housing, and workforce development in underinvested neighborhoods. (**Exhibit B**).²

Under ARPA, the County was required to evaluate each grantee’s risk of non-compliance with federal statutes and to determine an appropriate monitoring plan pursuant to 2 CFR § 200.332(b). To do this, the County created a risk assessment with questions regarding policies and procedures, financial management, record keeping systems, personnel, experience with federal grants, and audit requirements. These questions were based upon a survey that was presented to the applicants, asking them for detailed responses regarding these specific topics. The risk assessment consisted of twenty questions, and each applicant had a total score out of 100 possible points. Applicants were assessed as low (below 33), medium (34-66), or high risk (67-100)

¹ EXHIBIT A-1-A-3:

<https://drive.google.com/file/d/1SEc-FZy6KIYmai8V1YkJM0Ce5Ps2z5il/view?usp=sharing>,
<https://drive.google.com/file/d/1cN3akvTmM193XGMh4Q-BKbXFbqhuqDFX/view?usp=sharing>,
<https://drive.google.com/file/d/1OCq9M0jV1qCme8JgGI2aQHlYpsySbPRG/view?usp=sharing>

² EXHIBIT B: <https://www.monroecounty.gov/news-2022-10-22-arpa>

depending on how they scored on the risk assessment. Final scores were determined by the County Planning and Development Team (specifically, members of the County's ARPA team) and an internal audit and control manager from the County Department of Finance. These assessments were to be continually monitored with follow-up questions at desk reviews, that will follow the original survey format. At the end of each calendar year, the recipients will be re-evaluated, and their risk assessment may change accordingly **(Exhibit C)**.³

After the Bello Administration announced the list of awards totaling approximately \$100 million,⁴ it made it extremely difficult to obtain detailed information about awards, and it continues to conceal information to this day. Furthermore, the Bello Administration engaged in a public pressure campaign to rush the Legislature into approving the funds, in essence daring us to vote no.

First, I requested to see each subrecipient's applications to the County on September 22, 2022 and received no response. I followed up on October 20, 2022 and was told I needed to make an appointment in person to view the documents **(Exhibits D⁵, E⁶)**. I was provided with numerous binders containing hundreds of pages that would have taken countless hours to meaningfully review. I did not see scores under the purported risk assessment process or overall scores. The County told the Legislature the information had been available for in-person review for two months, but my experience indicates that is false **(Exhibit F)**.⁷

Second, during the review process, the County repeatedly enlisted members of the community to pressure the Legislature to approve ARPA contracts before we had a chance to perform proper oversight **(Exhibit G, H)**^{8,9}, even publicly criticizing then-Legislature President Sabrina Lamar for delaying the vote on the awards **(Exhibit I)**.¹⁰ Furthermore, Bello personally made award announcements prior to legislative approval to assist with the reelection campaign of Congressman Joe Morelle in 2022 **(Exhibit J)**.¹¹

Even today, in looking up the contracts for the sub-awardees, the scope of work is not provided in the County's contract portal **(Exhibit K)**.¹² I can download CRC's contract, but not the work they are supposed to perform **(Exhibit L)**.¹³

³ EXHIBIT C: https://www.monroecounty.gov/files/planning/arpa/July_2023_ARPA_Report_V3_8-22-23_With_Attachments%20-%20LIVET%20UPDATED.pdf (Pages 49-50)

⁴ EXHIBIT B

⁵ EXHIBIT D:

https://drive.google.com/file/d/1xvVWdNwhdzOdLScI2BE_rlMY6YEslAwz/view?usp=sharing

⁶ EXHIBIT E:

https://drive.google.com/file/d/12yJOfHM_tAsdrmd72E74LLb7a_7pRDsF/view?usp=sharing

⁷ EXHIBIT F: <https://drive.google.com/file/d/1eg746r4Sy7dGNoD5cuKyUckIDo8-Timl/view?usp=sharing>

⁸ EXHIBIT G

https://drive.google.com/file/d/1RSFZz2RwTQFh6GwnscduHAT6Tl1wit_t/view?usp=sharing

⁹ EXHIBIT H: <https://drive.google.com/file/d/1U9QS56HJB5va88s8GYFC1SQPtP3h-270/view?usp=sharing>

¹⁰ EXHIBIT I: <https://www.monroecounty.gov/news-2022-11-15-arpa2>

¹¹ EXHIBIT J: <https://www.monroecounty.gov/news-2022-10-13-arpa>,

<https://www.monroecounty.gov/news-2022-10-19-lifespan>, <https://www.monroecounty.gov/news-2022-10-27-arpa>, <https://www.monroecounty.gov/news-2022-11-03-arpa>, <https://www.monroecounty.gov/news-2022-11-04-arpa>,

¹² EXHIBIT K: <https://contracts.monroecounty.gov/search> (must create account)

¹³ EXHIBIT L: <https://drive.google.com/file/d/1MplTcikjO-9NnlHh6KHEmxVYQxJzXK5d/view?usp=sharing>

On February 7, 2024, Monroe County Executive Adam Bello accused CRC of mishandling federal dollars disbursed under the ARPA, and providing false statements (**Exhibits M-1 and M-2**).¹⁴ He ordered the contract funds frozen, and launched a forensic audit into the organization.¹⁵ Bello alleged that CRC failed to perform the services it was contracted for, failed to maintain a financial system or financial records, and failed to comply with audit services for federal grants. Bello said the County has paid CRC \$1.1 million to date.¹⁶

This malfeasance has created many victims. According to several people close to this situation, at least two organizations that submitted invoices for reimbursements to CRC are at risk of not making payroll. One organization told me it is owed tens of thousands of dollars by CRC and may have to furlough staff. One staff member of a nonprofit CRC tried to sell them items from CRC executive Tina Paradiso's printing company. The Bello Administration, through its representatives, has asked the nonprofits not to speak to the media or share their stories publicly. The nonprofits are complying because they are scared that they will not ever get paid money they are owed.

At face value, there are many red flags about CRC that would have been obvious to the Legislature, had we reviewed the application separately and with all available information:

- CRC is run out of a printing company owned by the founding Executive Director, Tina Paradiso. Both Imprintable Solutions and CRC have the address of 100 College Ave., Suite #130. Numerous elected officials even celebrated the co-location. (**Exhibit N**).¹⁷
- Paradiso became Chief Operating Officer last summer. Like Paradiso, her successor, Executive Director Anthony Hall, a well-known anti-violence specialist, does not appear to have experience managing millions of dollars in federal funding.
- No one on CRC's staff as described on its website last week (since removed) appears to have any expertise in managing significant federal dollars or titles indicating they are managing funds (**Exhibit O**).¹⁸
- Some of the nonprofits that contracted with CRC did not need to utilize a fiscal agent as a pass-through entity because they already have managed federal, state and/or local contracts.

CRC also has conflicts that should have been flagged during its contract with Monroe County:

- CRC purchased a building on Dewey Avenue that houses a barbershop run by Devon Reynolds (**Exhibit P**)¹⁹, who appears on CRC's incorporating documents as a board

¹⁴ EXHIBIT M:

<https://drive.google.com/file/d/1tKh0NiFxFxKmbuJQ7KX2WFEKCMVJnXckuB/view?usp=sharing>,

https://drive.google.com/file/d/19EBw_kZ0QIIW0iF_hR1EnnIM_KoCatF5/view?usp=sharing

¹⁵ [Monroe County investigating outreach group's handling of \\$1M in COVID relief funds](#), WXXI

¹⁶ [Monroe County temporarily suspends ARPA funding for Community Resource Collaborative](#), WROC (video of full press conference)

¹⁷ EXHIBIT N: <https://x.com/RochesterChambr/status/1707486704351711368?s=20>

¹⁸ EXHIBIT O: <https://drive.google.com/file/d/1gA3NBEvKbj5wloAbTUC5OOP-F8SJ4lxi/view?usp=sharing>

¹⁹ EXHIBIT P: <https://drive.google.com/file/d/1gmRUOMJhgkD4NOaADd-6tSLL5rfkQZzx/view?usp=sharing>

member²⁰ and in a Facebook post by Hall as an employee (Exhibit Q).²¹

- CRC contracts with C3 Consultancy, which is owned by Jocelyn Basley, who says on her LinkedIn page she joined the CRC board in August 2023 (**Exhibit R**).²²

I also request a review of how \$4.6 million of ARPA dollars was awarded to the Reentry Association of Western New York (hereinafter RAWNY). The grant was awarded so that “RAWNY will open a Reentry One-Stop that will allow anyone being released from incarceration to Monroe County to be connected to needed services and support, thereby increasing public safety, decreasing recidivism, and improving quality of life for the formerly incarcerated.”²³ Like CRC, RAWNY is an umbrella for numerous partner organizations that provide client services. And like CRC, in 2022, RAWNY had so little revenue it did not have to file an annual 990 report with the IRS (**Exhibit S**).²⁴ RAWNY also has something else in common with CRC: Tina Paradiso was RAWNY’s treasurer in 2022, when RAWNY reincorporated under a new name and the County selected the organization for the sizable reward (**Exhibit T**).²⁵

In conclusion, I believe an investigation is necessary to determine if federal COVID relief dollars are being spent appropriately in Monroe County, and if the Bello Administration has performed due diligence in selecting and monitoring grantees. Funds remain at risk and nonprofits that perform crucial services to Monroe County residents are in danger of curtailing their services and even shutting down.

Sincerely,



Rachel Barnhart – Legislator District 17

cc: U.S. Department of Treasury

²⁰ EXHIBIT A

²¹ EXHIBIT Q:

<https://drive.google.com/file/d/1ccTEVP7jioUEAYfIMaXpanMOFVAVqs23/view?usp=sharing>

²² EXHIBIT R: <https://www.linkedin.com/in/jocelyn-basley-46555a7/>

²³ EXHIBIT C: https://www.monroecounty.gov/files/planning/arpa/July_2023_ARPA_Report_V3_8-22-23_With_Attachments%20-%20OLIVET%20UPDATED.pdf (Page 35)

²⁴ EXHIBIT S: <https://drive.google.com/file/d/1RtZ9lsFi3Bsrn8qiXjEA216-wZf38xnV/view?usp=sharing>

²⁵ EXHIBIT T:

<https://drive.google.com/file/d/1Bh7dlY4wHf3cq0uoENKo3hGJxY3Tutid/view?usp=sharing>