

1. What Unit is responsible for the Investigation of client fraud allegations? Please provide name of unit, # of positions, titles of positions, and how allegations are processed.

The Special Investigations Unit (SIU) is responsible for the investigation of all allegations of client fraud. SIU is located in the Division of Administrative Services which is a support unit in the Department of Human Services. The SIU is composed of 15 Social Services Investigators, 1 Senior Investigator, and 1 Supervising Investigator. Three of the investigators are dedicated primarily to Day Care Fraud,

The SIU operates in five major areas; Fraud Investigations, Front-End Detection System (FEDS), Back End Detections System (BEDS), Child Care Fraud, and Intentional Program Violations. Referrals alleging client fraud are received from employees, the fraud hotline, State agencies, etc. Referrals from within the agency are electronically made using a locally developed, Investigative System. All employees within the Department of Human Services have access to the Investigative System for electronic referrals on any of the 5 major areas of investigations. These referrals are automatically assigned by the Investigative System to a Social Services Investigator for investigation and resolution. Once completed the Investigator inputs his notes and resolution into the Investigative System, at which time supervisory sign off is necessary. FEDS resolutions also require Intake Team Supervisory signoff.

2. What Unit is responsible for the prosecution of client fraud allegations? Please provide the name of the unit, # of positions, titles of positions and how allegations are processed.

Within the local district, it is SIU's responsibility to determine if fraud does exist, computation of overpayments when necessary, and action taken. Most cases are resolved administratively. Cases involving large overpayments are referred to the Monroe County Sheriff's Office and then to District Attorney's Office (Economic Crime Bureau) for criminal prosecution.

3. What Unit is responsible for determining the overpayment amount, establishing the claim, and collection activities?

The Special Investigations Unit and local district Temporary Assistance staff determine the overpayment amounts. Staff from the Monroe County Finance Department establishes a claim in CAMS (Cash Asset Management System).

The claims are established and collected in the following ways:

- Most overpayments are handled administratively through restitution. Overpayments of cash and SNAP are recovered through a grant reduction on active cases and by direct billing if the individual is no longer a recipient.
- With cases that go through the District Attorney and a criminal conviction is had, restitution is payable through Probation
- Monroe County attempts to get Confessions of Judgment on cases that go through the Disqualification Consent Agreement process.

4. What are the step by step procedures for the referral of fraud cases for Administrative

Hearings, including notices provided and the timing of providing such notices?

Intentional Program Violations – Administrative Disqualification Hearings

The SIU prepares cases for Administrative Disqualification Hearings.

The ADH process follows the procedures set forth in 18 NYCRR 359 that must be followed when a Temporary Assistance and/or SNAP recipient is accused of intentionally violating the requirements of the Temporary Assistance and/or SNAP in a fraudulent manner.

The following process is the prescribed method for Monroe County's Department of Human Services to initiate an Administrative Disqualification Hearing (ADH).

1. Conduct Intentional Program Violation (IPV) screening.

(a.) Screening for possible IPV is conducted by Department of Human Services' (DHS) Special Investigations Unit (SIU).

A referral is made/received from various areas within the DHS. Most come from PA/SNAP/MA teams, QRT and SIU itself. Referrals should be submitted through the SIU on-line Investigations System.

SIU will screen the referral by obtaining scanned documents from the Imaging and Enterprise Document Repository (IEDR)

Original documents will be supplied by Investigators when they are working on fraud cases, and whenever possible from other referring Units

(b.) The record is reviewed to determine if the applicant/recipient falsified any documents and submitted the documents to DHS; or misrepresented, concealed or withheld facts concerning eligibility in an attempt to intentionally increase or prevent a reduction in benefits.

(c.) If it is determined that an IPV has occurred, the ADH is initiated by SIU.

All documentation is retained in a SIU IPV file.

When a referral is rejected or accepted, a notation is made on the IPV referral in the Investigative System. The status can be seen by anyone that needs to check on the case.

Periodic updates to an IPV referral by utilizing the Special Investigations System are made to keep all information and status current.

(d.) If it is determined that an IPV has not occurred, and an IPV will not be pursued by SIU, appropriate individuals are contacted to alert them that either an overpayment should be computed, or action should be taken to begin collection of an overpayment.

(e.) To screen for an IPV, it is not required that an overpayment has occurred.

It is only necessary that an individual has:

(1.) “intentionally made a false or misleading statement, or misrepresented, concealed or withheld facts concerning the individual’s, or the individual’s family’s eligibility for Public Assistance or SNAP;”

(2.) “committed any act intended to mislead, misrepresent, conceal, or withhold facts or propound a falsity concerning the individual’s or the individual’s family’s eligibility for Public Assistance or SNAP.”

(3.) “engaged in any conduct inconsistent with the requirements of Reg. 350, 351, 352, 369 or 370.”

(f.) If an IPV has been committed, SIU will do the overpayment computation per NY State and Federal guidelines.

(g.) Financial Care Path (FCP) Examiners, when it is determined that an IPV has not taken place; are responsible for the computation of any overpayments and initiating recoupments.

2. Preparation for ADH

a. Evidence is gathered from the scanned case record, and any original documents that are available. If required, SIU must obtain any supporting documentation that is not available. This can be done by further field and office investigations by SIU. A SIU Investigator will obtain any evidence that is required, but not limited to, interviews, affidavits, Home Visits or determining possible forgeries.

b. Compute the overpayment (O/P) Only the portion of the O/P that is client error is to be included as part of the IPV. Neither, Agency Error (AE), nor Inadvertent Household Error (IHE) may be part of the O/P computation. They are separate issues and are to be handled as a normal overpayment. It is important that old budgets (previous amounts issued) and corrected budgets both be included in O/P presentation for comparison purposes.

(c.) ADH packet is prepared.

The packet is the completed presentation of the facts and issues of the IPV. This process must be followed exactly, as the packet form and substance is outlined in 18 NYCRR Part 359 of Social Service Law.

The ADH Packet contains:.

- Transmittal of Request for ADH.
- Legal Assistance contact info
- List of Agency witnesses
- Investigative Summary
- List of Exhibits
- case record materials
- investigative information
- O/P calculation
- Redemption verification

(d.) Scheduling of ADH.

(1.) SIU maintains a file with all necessary documentation.

Two (2) copies of the original ADH packet are made and are sent to:

OTDA

ADH Unit – PO Box 1930

Albany, NY, 12201

(2.) OTDA will schedule a hearing date and mail notification of the date to the client and will notify Monroe County's Special Investigation Unit.

(3.) A Waiver of the Administrative Disqualification Hearing ("Waiver") is also sent to the client at this time by OTDA. This Waiver allows the individual to sign the form and agree to the disqualification, rather than holding an ADH.

(4.) OTDA may contact SIU before the hearing date is scheduled in order to confirm the correct mailing address for the client. Normally, SIU will mail at least 10 completed packets to Albany at one time in order to expedite the ADH scheduling.

(5.) A Fair Hearing Calendar is sent to SIU at least 30 days prior to ADH date. The ALJ is listed as well as all of the scheduled clients that are to appear.

(6.) SIU will input all appointments in WRATS and schedule a room to conduct ADH's.

3. Hearing

(a.) The hearing is conducted by the DHS Special Investigation Unit (SIU) with a Special Investigation Unit representative in attendance. The SIU representative must be present to give testimony and to present the ADH packet. An Administrative Law Judge (ALJ) is assigned by OTDA to hear the case.

(b.) If the accused party is in attendance, the individual is given an opportunity to testify. The accused party is allowed to have legal representation.

(c.) If the accused is not in attendance at the hearing, the hearing is still conducted without the accused being present. The case is then "Heard – Ex Parte".

1. ADH Decision

(a.) OTDA notifies the Monroe County Fair Hearing Office (FHO) and SIU when a decision has been reached. The FHO often acts as a liaison between ODTA and SIU. Hearings are conducted at the Fair Hearing offices located at 691 St. Paul St. Rochester, NY 14621 and 111 Westfall Rd. Rochester, NY 14620.

(b.) OTDA sends the final decision to SIU and FHO. Results will either be in favor of the Agency – an affirmation; or in favor of the accused – a reversal. An affirmation results in a disqualification. The affirmation may have a request to recalculate, correct or verify an O/P determination; also some part of the requested disqualification may be reversed.

(c.) A favorable decision for the Agency may not be challenged by an accused individual. The O/P amount may be challenged if not included in the decision. A Fair Hearing may not be called by an individual to challenge an ADH decision after the individual is found to have committed an IPV.

5. Impose Disqualification

- (a.) SIU sends out notices to the individual found to have committed an IPV.

LDSS 4827 – Disqualification Notice for PA

LDSS 4799 – Disqualification Notice for FS

Both of these notices are found on

Centraport/ Links: forms/ OTDA forms

- (b.) Actions on disqualifications must be imposed within 45 days of the Date of Decision from OTDA. If the 45 day limit is exceeded, then the disqualification period is shortened by the length of the time exceeding the 45 days.

- (c.) Processing of the DSS 3209, Authorization Change Document.

- (1.) If individual is not active, or case is closed, SIU will put the disqualification codes (PA and FS individual reason codes) on Screen 3, so they are saved if the case is reactivated.

- (2.) If individual is not active or case is closed, PA disqualification is postponed (“pended”) till disqualified individual is again eligible for cash assistance.

- (3.) SNAP regulations require that disqualifications must be imposed within 45 days, even if no SNAP benefits are being issued.

- (d.) Active cases.

- (1.) If disqualified individual is active, the individual must be deleted from the case. This action will often cause the case to close if the individual is the only active person on the case. If the disqualified individual has income of any kind, the income is not deleted from the budget.

- (2.) SIU will delete the individual, or close the case, by completing actions on the 3209. Disqualification codes and AFA codes must be entered on the 3209.

AFA code 218 is for SNAP

AFA code 220 is for PA

- (3.) SIU will complete “PA Program Disqualification” form and a copy will be scanned into the case record and also in the SIU file.

- (4.) SIU will complete the “SNAP Disqualification” form and a copy will be scanned into the case record and also a copy will be placed in the SIU file

- (5.) If the case remains open after the disqualified individual has been deleted, then;

(i) Any O/P that has been imposed is to be recouped in the new budget. Notice of the recoup amount must be sent to the individual by adding information to the LDSS 4827 and/or LDSS 4799.

(ii) New budgets must be sent to the individual.

(e.) Closed cases

(1.) PA disqualifications are to be postponed until the individual is eligible for services. A "Pended PA Program Disqualification" form is completed and a copy placed in the case record and SIU file.

(2.) SNAP disqualifications are to begin within 45 days. A "SNAP Disqualification on Inactive Case" form is to be completed and a copy is placed in the case record and a copy is placed in the SIU file. If there is an O/P that has been imposed, the "Pended PA Disqualification" form, and the "SNAP Disqualification on Inactive Case" form are sent to Accounts Receivable.

(f.) When case is completed and a decision has been rendered, all documentation is scanned into IEDR; the paper file is maintained within SIU.

6. Reporting Procedures:

(a.) There is a monthly report that is sent to OTDA. It is completed and e-mailed to:

Jill Charette (OTDA)

(518) 474-2491

Jill.Charette@otda.ny.gov

This report (DISQinputsheet2.xls) is a summary of all disqualifications that were done during the previous month. The information is gathered from the PA & SNAP IPV Disqualification Report document.

(b.) SIU Monthly Report (MonthlyIPV.xls).

This report is a compilation of data that is forwarded to:

Perry Wheeler

DHS – Director of Operation

Data is gathered from information maintained by SIU.

2. What are the step by step procedures for the referral of fraud cases to your District Attorney, including notices provided and the timing of providing such notices?

Cases of aggravated intent to defraud are referred to the District Attorney for criminal action. The following is a description of operation procedures for the prosecution of fraud cases:

All fraud overpayments in excess of \$1500.00 are screened.

All Day Care fraud overpayments in excess of \$5000 are screened.

The District Attorney has agreed to review cases of lesser amounts when presented and discussed.

SIU submits an evidence packet to the DA to review. If accepted for prosecution, and the DA determines to not offer a disqualification consent agreement (DCA), an additional evidence packet is submitted to the Monroe County Sheriff's Office.

Any further investigation, including location of witnesses, additional statements and location and arrest of the client is done by Sheriff's Office. Depending upon the severity, the case is either submitted directly to the Grand Jury or a felony complaint is filed in Rochester City Court or appropriate Town court.

6. What are your procedures for offering a Disqualification Consent Agreement (DCA)?

When the District Attorney's Office has accepted a case for prosecution, but has determined that a DCA is appropriate, it will authorize SIU to assist in obtaining the DCA in lieu of prosecution. The requirements set forth in 18 NYCRR 359.4 are followed:

a. SIU does discuss with the District Attorney whether it believes that a DCA is appropriate in each case. Factors that are a part of that discussion are:

- Total dollar amount of fraud
- How was the fraud discovered? (Did the client ever report the income, change of circumstances, etc.?)
- The number of applications and/or re-certifications where the client failed to disclose the information that led to the fraud.
- Past history of fraud or criminal record.
- Physical and mental health of client.
- Time period of the fraud.
- Strength of overall evidence.
- Availability of witnesses.
- Availability of applicant/recipient (still living in this county)
- Activity status of Public Assistance case.

Memorandum of Understanding with Monroe County District Attorney

An "Agreement" is in place between MCDHS and the District Attorney's Office.

The Agreement outlines the basic agreement between DHS and the District Attorney. This agreement gives the DHS the right to refer cases to the District Attorney and an opportunity to utilize the DCA process.

Preparation for DCA

There is a \$1500 threshold regarding the lowest limit for prosecution regarding DCA's.

Cases less than \$1500 will be accepted by the District Attorney's Office on a case by case basis.

All fraud cases are to be considered for prosecution. It is the fraud amount that determines whether case will be the Administrative process (ADH) or Criminal process.

(a.) Gather evidence from the scanned case record, and any original documents that are available.

(i) If required, SIU must obtain any supporting documentation that is not available. This can be done by further field and office investigations by SIU.

(ii) An SIU Investigator will obtain any evidence that is required, but not limited to, interviews, affidavits, Home Visits or possible forgeries.

(b.) Compute the overpayment (O/P).

Only the portion of the O/P that is part of the fraud amount is to be included as part of the IPV.

Neither Agency Error (AE), nor Inadvertent Household Error (IHE) may be part of the O/P fraud computation. They are separate issues and are to be handled as a normal overpayment.

It is important that old budgets (amounts issued) and correct budgets both be included in O/P presentation for comparison purposes.

DCA packet is prepared.

This packet is similar to an ADH packet (see ADH section of this manual) in its initial format. There are additional papers required to complete the process that are in addition to the ADH packet. The packets are submitted to the Monroe County District Attorney's Office for review.

- i. If the Monroe County District Attorney's Office accepts the case for prosecution it may ask the SIU to assist in the offer of the DCA in lieu of prosecution and adjourn in contemplation of dismissal.
- ii. SIU will then mail a letter to the client requesting the client come into the DHS office for an interview.
- iii. When client attends interview, the DCA is presented and explained. A second appointment is made for at least ten (10) days later to discuss the DCA with the client.
- iv. If the client signs the DCA – a return appointment is still scheduled for at least ten (10) later for client to return and discuss the DCA.
- v. If client fails to attend the first appointment, a second letter is sent to the client.
- vi. If client does not appear for any scheduled appointments, the case is referred for criminal prosecution.

DCA Part I and II

(a.) Part I: Notice of Consequences of Consenting to a Disqualification Consent Agreement.

(i) The notice must contain the disqualification penalties that the client/defendant will be assessed upon signing the DCA

(ii) The notice must be signed by the client/defendant

(b.) Part II: Disqualification Consent Agreement (DCA)

(i) The DCA is the actual agreement between the client/defendant and MCDHS

(ii) The DCA gives a client/defendant the chance to accept a disqualification from the PA and/or SNAP programs, rather than be further prosecuted by the District Attorney's Office

(iii) The client/defendant must be given the opportunity to consult with an attorney

(iv) The DCA is normally mailed to the defendant with the Notice of Consequences

(v) It is normal practice though for SIU to give an additional ten days after the DCA is signed so the defendant may review the Agreement

(vi) The DCA has the name and contact number of the person in SIU that the appointment will be with to complete the DCA

DCA Decision

- (a.) When the DCA is signed by the client/defendant, the disqualification is processed by SIU.
- (b.) A reimbursement Agreement is included within the DCA to address the overpayment.
- (c.) A Confession of Judgment, which is also signed by the client/defendant, is forwarded to the Monroe County Law Department for future processing with the County Clerk. This allows Monroe County to pursue collection action against a defendant when not paying prescribed restitution

DCA Refusal

- (a.) In the event the client/defendant refuses to sign the DCA, the file is forwarded to the Monroe County Sheriff's Dept. to have the individual arrested.

In some instances, depending on the dollar amount, the DCA is still an option and the Sheriff arranges for the client/defendant to come in and sign the DCA.

- (b.) At the discretion of the District Attorney, the case may be returned to SIU rejecting the possibility of prosecution. SIU will then pursue an ADH to resolve the fraud issue.

Impose Disqualification

- (a.) SIU will complete all necessary paperwork to impose the IPV

LDSS 4827 – Disqualification Notice for PA

LDSS 4799 – Disqualification Notice for SNAP

- (b.) Disqualifications must be imposed within 45 days from the Date of Decision from OTDA

If the 45 day limit is exceeded, then the disqualification period is shortened by the length of the time exceeding the 45 days.

- (c.) Processing the DSS 3209, Authorization Change Document.

- (i) If individual is not active, or case is closed, SIU will put the disqualification codes (PA and SNAP individual reason codes) on Screen 3, so information is saved if reactivated.

- (ii) If individual is not active or case is closed, PA disqualification may be postponed till disqualified individual is again eligible for cash assistance.

(iii) SNAP regulations require that disqualifications must be imposed within 45 days, even if no SNAP benefits are being issued.

(d.) Active Cases

(i) Disqualified individual is to be deleted from the case. This action will often cause the case to close if only one individual is the only active person on the case.

(ii) SIU will delete the disqualified individual, or close the case.

SIU will complete the 3209, processing the deletion or closing.

AFA code 218 is for SNAP

AFA code 220 is for PA

(iii) SIU will complete "PA Program Disqualification" form.

(iv) SIU will complete the SNAP Disqualification" form.

(v) If the case remains open after the disqualified individual has been deleted, then;

*Any overpayment that has been imposed is to be recouped in the new budget. Notice of the recoup amount must be sent to the individual by adding the information to the LDSS 4827 and/or LDSS 4799.

New budgets must be sent to the individual

(e.) Closed cases

(i) PA disqualifications are to be postponed until the individual is eligible for services.

A "Pended PA Disqualification" form is to be completed.

(ii) Snap disqualifications are to begin within 45 days.

A "SNAP Disqualification on Inactive Case" form is to be completed.

(iii) If there is an Overpayment that has been imposed, the "Pended PA Disqualification", and the "SNAP Disqualification on an Inactive Case" are to be sent to Accounts Receivable.

Copies of the Disqualification Notices (LDSS 4827 and LDSS 4799) are to be sent to Accounts Receivable.

(f.) Scanning

(i) All documentation is to be scanned into Imaging and Enterprise Document Repository (IEDR).

(ii) Scanned documents go into Category 8 in IEDR.

Reporting Procedures

(a.) There is a monthly report (DISQinputsheet2.xls) that is sent to OTDA; it is completed and emailed to:

Jill Charette

(518) 474-2491

Jill.Charette@otda.ny.gov

This report is a summary of all disqualifications that were processed during the previous month.

The information is gathered from the PA & SNAP IPV Disqualification Report checklist.

(b.) SIU Monthly Report (MinthlyIPV.xls).

This report is a compilation of data that is forwarded to:

Perry Wheeler

DHS Director of Operations

Data is gathered from information maintained by SIU in the Investigative System.

7. How is it proven that an individual has been advised on the Court Record of the Public Assistance disqualification penalties?

1. Pleas of Guilty to act(s) constituting IPV:

Prior to entry of the plea, defendant's attorney will be provided with a statement similar to Attachment VII-A of 93-ADM-8 and directed to advise his/her client of the contents of the form and the consequences of his/her plea. The defense attorney will ensure defendant's understanding and obtain defendant's signature acknowledging the same. The defense attorney will also sign the document acknowledging that he has advised the defendant of the contents and consequences of the plea.

At the time of entry of the plea, as a part of the defendant's colloquy to his/her rights and factual recitations of the crime on the stenographer record of proceedings, the defendant, pursuant to questions, either by the judge or the Assistant District Attorney, has explained the disqualification provisions on the form, that defendant understands them and that defendant has signed this form. The form is then made part of the court's records of the case, with copies to the defendant and the District Attorney's office.

2. Conviction after trial of act(s) constituting IPV:

Prior to sentencing, the defendant's attorney will be provided with a form similar to Attachment VII-A and directed to advise his/her client of the contents of the form and consequences of the finding of guilty. The procedure at sentencing is the same as when a guilty plea is entered. However, if the defendant refuses to sign the acknowledgement on the document or state acknowledgement on the record at time of sentencing, the court may either direct the defense attorney to relate his/her actions with regards to the disqualification advisory on the record or the court, itself, may recite the contents of the form to the defendant on the record.

Again, the original document is made a part of the court record with copies to the defendant and the DA's office.

AGREEMENT

THIS AGREEMENT, by and between the MONROE COUNTY DEPARTMENT OF HUMAN SERVICES, DIVISION OF SOCIAL SERVICES, (hereinafter referred to as MCDSS), and the MONROE COUNTY DISTRICT ATTORNEY'S OFFICE, (hereinafter referred to as the District Attorney) is effective when signed by both parties hereto and approved by an appropriate official of the New York State Office of Temporary and Disability Assistance.

WITNESSETH

WHEREAS, New York Social Services Law §145, 18 NYCRR 348, 18 NYCRR 359(4), and 7 CFR 273.16 require MCDSS to refer to the District Attorney cases wherein reasonable grounds exist to believe that benefit fraud was committed; and

WHEREAS, MCDSS is the local social services district for the County of Monroe, State of New York, and

WHEREAS, County Law §700 requires the District Attorney to conduct all prosecutions for crime and offenses cognizable by the courts of the County for which she shall have been elected or appointed; and

WHEREAS, regulations contained in 18 NYCRR 348.2(b) require an agreement between the District Attorney and MCDSS establishing the procedures for referral to the District Attorney of all cases where reasonable grounds exist to believe that fraud has been committed,

WHEREAS, it is appropriate that the parties hereto enter into a written agreement setting forth their respective duties under the above-stated provisions of State and Federal Law and regulation;

NOW, THEREFORE, it is agreed and understood as follows:


1. MCDSS shall maintain systems to detect suspected cases of fraud involving Public Assistance, Supplemental Nutritional Assistance Program ("SNAP"), Medicaid and any other program providing benefits or care administered by MCDSS.

2. MCDSS will refer to the District Attorney appropriate cases of alleged fraud related to the above programs.
3. Criteria for submission of referrals to the District Attorney are as follows:
 - a. A minimum overpayment of \$1500.00, except upon advance discussion with and approval of the District Attorney.
 - b. Type of violation
4. MCDSS shall provide the District Attorney with all pertinent information (including, but not limited to, the computation of overpayments for cases of alleged fraud) in an evidence packet to permit the District attorney to assess whether it will accept the case for prosecution within the meaning of 18 NYCRR 359.4(2).
5. The District Attorney shall accept such referrals from MCDSS and prosecute or assist in the proper disposition and resolution of same, or decline to accept the case for prosecution, as appropriate.
6. For any case accepted for prosecution within the meaning of 18 NYCRR 359.4(2), the District Attorney may authorize MCDSS to assist in obtaining a disqualification Consent Agreement (DCA) in lieu of further criminal prosecution.
7. As required by 18 NYCRR 359.5(c), should the District Attorney decline to prosecute a referral, and should MCDSS elect to initiate the process for an administrative disqualification hearing, MCDSS shall formally withdraw, in writing, the referral before referring the case to the New York State Office of Temporary and Disability Assistance.
8. The District Attorney agrees to maintain the confidentiality of information relating to recipients of Public Assistance, and care and other benefits in the State of New York, in accordance with 42 USC 1396(a)(7) and 42 CFR 431.300, 42 USC 602(a)(9) and 45 CFR 205.50, 7 USC 2020(e)(8), and the New York Social Services Law, Sections 136 and 369(3) as well as other applicable provisions of Federal and New York State Law.
9. The District Attorney agrees to comply with all applicable laws, rules, regulations and other requirements of the Federal government, the Department of Health and Human Services, the United States Department of Agriculture, the State of New York, and the State Department of Social Services related to benefit fraud.

10. This Agreement shall take effect upon the last date of signature by the parties and shall remain in effect until terminated or modified in writing by either or both parties.

MONROE COUNTY DEPARTMENT OF
HUMAN SERVICES, DIVISION OF
SOCIAL SERVICES

Date: 10-2-15

By 
KELLY REED, Commissioner of the
Monroe County Division of Social
Services

THE MONROE COUNTY DISTRICT
ATTORNEY

Date: 9/29/2015

By 
SANDRA J. DOORLEY
District Attorney of Monroe County

STATE OF NEW YORK)
COUNTY OF MONROE)

On this 2nd day of October, 2015, before me personally appeared KELLY REED, to me known and known to me to be the person described in and who executed the foregoing instrument, and acknowledged to me that she executed the same.


Notary Public

SHANNON JOY PUTNEY
Notary Public, State of New York
Qualified in Monroe Co., No. 01PU6241887
Commission Expires May 31, 2019

STATE OF NEW YORK)
COUNTY OF MONROE)

On this 29th day of September, 2015, before me personally appeared SANDRA J. DOORLEY, to me known and known to me to be the person described in and who executed the foregoing instrument, and acknowledged to me that he executed the same.


Notary Public

WENDY L. PACHLA
Notary Public, State of New York
Qualified in Monroe County
Commission Expires 2-9-19