Office of the Inspector General

Report of Investigation

Odie Donald II
Chief Administrative Officer
City of Richmond

November 18, 2025

In accordance with the Code of Virginia, 15.2-2511.2, the Inspector General is required to investigate all allegations of fraud, waste, and abuse. Further, and in reference to the City of Richmond Code 2-214 authorizes the Office of the Inspector General to conduct criminal, civil, and administrative investigations related to the municipal affairs of the City.

The Office of the Inspector General (OIG) has completed an investigation on RVA Sisters Keeper, a non-profit that received funding from the City of Richmond. This report presents the results of the investigation.

Case Origin:

This criminal investigation is predicated on information shared by the City of Richmond (COR) Auditors' Office, concerning the suspected violation of Virginia Code §15.2-2511.2, Fraud, and United States Federal Criminal Statute 18 U.S.C. §1343. Fraud by wire, radio, or television. Whoever having devised or intending to devise any scheme or artifice to defraud or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme. On May 1, 2023, the OIG was notified that RVA Sisters Keeper submitted fictitious invoices for work that was not completed. The estimated loss to the City of Richmond was reported at \$150,000.00.

Investigative Facts:

By way of background, in 2022, the City of Richmond (COR) conducted a last-minute bidding process for cold-weather and inclement-weather emergency shelters. Due to a sense of urgency, approximately \$995,000 was allotted with minimal accounting or oversight. Prior to 2022, funds were distributed as general budgets for invoices or housing; however, in January 2023, the COR shifted to using purchase orders and invoices. The bulk of the funding, provided under the American Rescue Plan Act (COVID) and the HUD Block Grant, was intended for renovations and repair costs.

Investigators reviewed RVA Sisters Keeper's purchase orders and invoices for renovations and repair work purportedly completed at the shelter. The work described in the invoices did not match the actual conditions observed by investigators during their site visit.

The query of bank records also showed that the payments made to the contractor were inconsistent with the amounts RVA Sisters Keeper billed to the COR. While some work

was performed, RVA Sisters Keeper added multiple line items and charges to the invoice submitted to the COR.

Additionally, when investigators reviewed the shelter's lease, they found that the property owner, not RVA Sisters Keeper, was responsible for maintaining the interior, exterior fixtures, roof foundation, HVAC, electrical, plumbing, and other building systems. Despite this, RVA Sisters Keeper used City funds to pay a contractor for several repairs that should have been the landlord's responsibility.

Further investigation revealed discrepancies with other RVA Sisters Keeper invoices claimed for a cleaning service for the shelter. Investigators identified differences between the amount the shelter received and the amount RVA Sisters Keeper billed the COR. In addition, the investigation uncovered that the invoice submitted to the COR was fictitious and did not match the cleaning service's actual invoice format or appearance.

The United States Postal Inspector's and the United States Department of Housing and Urban Development Office of Inspector General investigators also worked on this investigation. The total loss to the City of Richmond and Housing and Urban Development totaled \$199,000.00.

On November 18, 2025, the Vice President of RVA Sisters Keeper plead guilty in US Federal Court to one count of Wire Fraud, with Sentencing set for a later date.

Conclusion:

Va. Code §15.2-2511.2 defines fraud as, "Fraud means the intentional deception perpetrated by an individual or individuals, or an organization or organizations, either internal or external to local government, that could result in a tangible or intangible benefit to themselves, others, or the locality or could cause detriment to others or the locality. Fraud includes a false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, which deceives and is intended to deceive."

Based on the investigation's facts gathered with the City of Richmond's OIG in collaboration with the United States Postal Inspector's Office and the United States Department of Housing and Urban Development Office of the Inspector General, RVA Sisters Keepers committed fraud by intentionally submitting fictitious invoices. The actual loss is valued at \$199,000.00. This case is currently pending litigation.

The point of contact for this report can be reached at extension 1840.

Foster Curtiss

Submitted,

Interim Inspector General

CC: Honorable Members of City Council

Merrick T. Malone, Director of Housing & Community Development