

THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA

OFFICE OF INSPECTOR GENERAL
3318 FOREST HILL BLVD., C-306
WEST PALM BEACH, FL 33406
(561) 434-7335 FAX: (561) 434-8652
www.palmbeachschools.org
Hotline: 855-561-1010

TERESA MICHAEL, CIG, CIGI, CFE
INSPECTOR GENERAL

SCHOOL BOARD
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MICHAEL J. BURKE, SUPERINTENDENT

MEMORANDUM

TO: Daphne Stewart, Director of Professional Standards

FROM: Teresa Michael, Inspector General *TM*

DATE: December 20, 2023

SUBJECT: Transmittal of Final Investigative Report:
23-0025-I Misrepresentation/Falsification of documentation.

We have not received a response from the subject employee regarding OIG Case #23-0025-I at Boynton Beach Community High School. Attached is a copy of the final report without the subject response. This report is being released and transmitted to you for any action you deem appropriate.

School Board Policy 1.092.9.d., states:

"To enhance the independence, objectivity, and effectiveness of the investigative, review and auditing processes, a final report shall be submitted at the same time to all members of the School Board, the Superintendent and the affected department heads, members of the press and upon request, the general public. Final Audit reports and investigative reports that are deemed substantiated or unsubstantiated, in whole or in part, will be posted on the Inspector General's website upon completion of all required investigations. Unfounded reports will not be posted on the Inspector General's website." (Emphasis Added)

Please let us know if additional time beyond ninety (90) days will be needed for your department to complete any action necessary so that the OIG can post the final investigative report on the Inspector General's website, as required. Supporting materials for this investigation are available, please advise if you need any of the supporting materials.

Should you have any questions, you may contact Director of Investigations Oscar Restrepo at (561) 434-8183.

CONFIDENTIAL OIG AUDIT/INVESTIGATIVE DOCUMENT

This document is confidential and exempt from disclosure until the activity is complete and the report becomes final. §119.0713(2)(b), Fla Stat. DO NOT INSPECT OR RELEASE WITHOUT THE EXPRESS CONSENT OF THE OIG.

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MEMORANDUM

TO: Honorable Chair and Members of the School Board
Michael J. Burke, Superintendent
Chair and Members of the Audit Committee

FROM: Teresa Michael, Inspector General *TM*

DATE: December 20, 2023

SUBJECT: Transmittal of Final Investigative Report:
23-0025-I Misrepresentation/Falsification of documentation.

Attached please find a copy of the Palm Beach County School District Office of Inspector General (OIG) Final Report of OIG Case # 23-0025-I related to Misrepresentation/Falsification of documentation.

The OIG investigation concluded the allegation was **substantiated**.

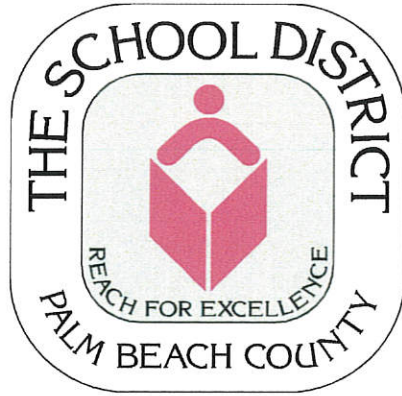
In accordance with *School Board Policy 1.092.9.b.iv.*, on November 8, 2023, the draft of this investigation was provided to Hilda Sultan for a response. A written response from Hilda Sultan _ was not received by the OIG.

This investigation was referred to The Office of Human Resources for action deemed appropriate.

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The School District of Palm Beach County



OIG CASE NUMBER 23-0025-I

**Boynton Beach Community High
School**

TYPE OF REPORT: FINAL

DATE OF REPORT: December 20, 2023



Teresa Michael

**Teresa Michael, Inspector General
Office of Inspector General
School District of Palm Beach County**

THIS REPORT MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. DO NOT RELEASE WITHOUT PRIOR COORDINATION WITH THE OFFICE OF INSPECTOR GENERAL.

Office of Inspector General

Report of Investigation 23-0025-I

EXECUTIVE SUMMARY

From May 15, 2023 to October 6, 2023, OIG staff conducted interviews and reviewed pertinent documentation and records as they related to the allegation. As a result of the investigation, OIG staff determined that the allegation that Boynton Beach Community High School teacher Hilda Sultan violated Palm Beach County School District Policy 3.02, *Code of Ethics – c. i. Code of Ethics Misrepresentation or Falsification - Falsifying or misrepresenting professional qualifications Falsifying or misrepresenting professional qualifications, criminal history, college or staff development credit and/degrees, academic award, and employment history when applying for employment and/or certification or when recommending an individual for employment, promotion or certification;* was **substantiated**.

On November 8, 2023, the OIG forwarded a copy of the draft report to Hilda Sultan for a response by December 14, 2023. Hilda Sultan did not respond.

INVESTIGATIVE PREDICATE

On May 15, 2023, the School District of Palm Beach County, Office of Inspector General (OIG) received a complaint via email that a teacher at Boynton Beach Community High School allegedly submitted falsified documents for years of experience credit to increase salary. (Allegation).

On May 16, 2023, OIG Investigator Angela Feaman was assigned this complaint for investigation.

BACKGROUND

Boynton Beach Community High School is a public school located at 4975 Park Ridge Blvd. Boynton Beach, Florida 33426. Student enrollment is 1701 serving grades 9 – 12.

ALLEGATION

It is alleged that Hilda Sultan violated School Board Policy 3.02. c. i. Code of Ethics Misrepresentation or Falsification - Falsifying or misrepresenting professional qualifications

School Board Policy 3.02 – Code of Ethics Misrepresentation or Falsification:

Falsifying or misrepresenting professional qualifications, criminal history, college or staff development credit and/degrees, academic award, and employment history when applying for employment and/or certification or when recommending an individual for employment, promotion or certification;

COMPLAINANT INTERVIEW

On August 15, 2023, a sworn recorded interview of Mark Mitchell, Director of Compensation and Employee Information Systems was conducted at 3300 Forest Hill Blvd. West Palm Beach, FL. The following represents actual and paraphrased statements made by “Mitchell” as it relates to the Allegation:

Mitchell stated he is the Director of Compensation and Employee Information Systems. Mitchell has been a district employee since 2005.

Mitchell stated that HR Analyst Ashley Hall came to him with documents relevant to this issue of fraud. Mitchell stated that as a part of Hall's job duties, she reviews the submittals for credit and she is trained that if anything is amiss to do more research and in this case she did and she presented to Mitchell a statement from the person that the applicant said had signed the forms and that person said she had not seen or signed those documents.

Mitchell then requested that this be investigated for fraud because it looks like on surface that this person submitted fraudulent documents for purposes of gaining salary experience credit.

Mitchell stated that Hall contacted and verified the document with Anita Lonstein the owner/Director of Fort Lauderdale Preparatory. Mitchell stated that he had not spoken with Sultan. Mitchell stated that Sultan has contacted his staff regarding the status of her request. Mitchell stated that Sultan is actively teaching at Boynton Beach High.

WITNESS INTERVIEWS

On August 15, 2023, a sworn recorded interview of Ashley Hall, HR Analyst III was conducted at 3300 Forest Hill Blvd., West Palm Beach, FL. The following represents actual and paraphrased statements made by “Hall” as it relates to the Allegation:

Hall stated she is a HR Analyst III in the Department of Compensation and Employee Information. Hall has been a district employee since 2013.

Hall stated Hilda Sultan forwarded emails to her regarding all of Sultan’s years of teaching experience from all her past places of employment. Hall stated that as she reviewed the paperwork they all had the same signature on them which presented a red flag. Hall stated that she reached out to multiple people to verify and she only received a response from one of them. Hall stated that person verified that they have never seen that form and did not sign that form. Hall stated that the person that she spoke with was Anita Lonstein.

Hall stated that Sultan submitted 6 verifications and they all had the same handwriting. Hall stated that Sultan’s current status is a teacher at Boynton Beach Community High School. Hall stated that Sultan was hired last year. Hall stated that once teachers are hired and they submit their experience for verification to determine if their salary can be increased based on their years of experience. Hall stated that Sultan started last year and had not received any experience credit to increase her pay. Hall stated that with the years of experience submitted, it would give Sultan the eligibility for the referendum supplement in the amount of five thousand dollars (\$5000).

Hall stated that when she presented Lonstein with documentation to complete, Lonstein verified that Sultan worked with Fort Lauderdale Preparatory for 76 days but the verification form submitted by Sultan stated that she worked with Fort Lauderdale Preparatory for 2 years.

On August 16, 2023, a sworn recorded interview of Anita Lonstein owner of Ft. Lauderdale Preparatory School was conducted at Ft. Lauderdale Preparatory in Ft. Lauderdale, FL. The following represents actual and paraphrased statements made by “Lonstein” as it relates to the Allegation:

Lonstein stated she is the Owner/Director of Ft. Lauderdale Preparatory School.

Lonstein stated that Hilda Sultan was a former English teacher at Fort Lauderdale Preparatory School. Lonstein stated that Sultan was employed from February 24, 2020 to June 15, 2020 for a total of 76 days.

Lonstein stated that she was contacted by Human Resources at the Palm Beach County School District and provided a verification of previous Public/Private teaching experience form. Lonstein stated that she filled out the form on May 12, 2023 and submitted it back to Human Resources at Palm Beach County School District.

I then questioned Lonstein about a Verification of Previous/ Private teaching experience form that was turned into Palm Beach County School District by Hilda Sultan dated March 23, 2023. This form stated that Sultan worked for Fort Lauderdale preparatory from August 2019 to June 2021. I provided Lonstein a copy of the form and Lonstein stated that she did not sign the form and confirmed that the signature on the form is not her signature.

On August 16, 2023, a sworn recorded interview of Kelly Lonstein, Head Mistress of Ft. Lauderdale Preparatory School was conducted at Ft. Lauderdale Preparatory School in Ft. Lauderdale, FL. The following represents actual and paraphrased statements made by “Kelly Lonstein” as it relates to the Allegation:

Kelly Lonstein stated she is the Head Mistress of Ft. Lauderdale Preparatory School.

Kelly Lonstein stated that Sultan worked briefly in school before going to work remotely from home due to Covid, working a total of 76 days. Lonstein stated that Sultan ended her employment at the end of the school year. Lonstein stated that this was during the pandemic.

SUBJECT INTERVIEW

On September 21, 2023, a sworn recorded interview of Teacher Hilda Sultan was conducted at Boynton Beach Community High School in Boynton Beach, FL. The following represents actual and paraphrased statements made by “Sultan” as it relates to the Allegation:

Sultan refused to speak with me and requested representation. On September 28, 2023, Sultan emailed OIG to notify that she has resigned due to health issues. On October 2, 2023 OIG telephoned Sultan to inquire on meeting and was told she would reach out to her representative and get back to OIG.

In our October 2, 2023 conversation, Sultan did mention that she signed her friend's signature on one of the forms and that she admitted to being sloppy when filling out the verification of teaching experience forms.

CONCLUSION

The OIG, upon thorough investigation, determined the allegation that Boynton Beach Community High School teacher Hilda Sultan violated Palm Beach County School District Policy 3.02, *Code of Ethics – c. i. Misrepresentation or Falsification: Falsifying or misrepresenting professional qualifications, criminal history, college or staff development credit and/degrees, academic award, and employment history when applying for employment and/or certification or when recommending an individual for employment, promotion or certification;* was **substantiated**.

ADDITIONAL INFORMATION

OIG emailed Lelis A. Ortiz Parra, Vice President of Academic Affairs at Jose Maria Vargas University to verify employment history for Sultan. Lelis A. Ortiz Parra, Vice President of Academic Affairs at Jose Maria Vargas University verified Sultans employment from October 15, 2018 to December 10, 2018 contradicting the number of days worked that was provided on the form that Sultan submitted to HR.

On October 2, 2023, OIG telephoned Sultan to inquire on meeting for an interview. Sultan stated that she would consult with a representative and get back to the OIG. Sultan stated that she was aware that she “did things sloppy” regarding the Verification of Previous Public/Private Teaching Experience Form. Sultan admitted to signing what she stated was one of her friends name to a document. Sultan asked if this case would still be open if she decided to return to the Palm Beach County School District.

Numerous attempts were made to contact Sultan to schedule an interview with no response. October 2, 2023, Sultan stated she will get back with OIG after consulting a representative. October 4, 2023, left a message for Sultan to return a call to the OIG. October 12, 2023, left a message for Sultan to return a call to the OIG asap. October 18, 2023, left a message for Sultan to return a call to the OIG. To date no return call has been initiated.

The evidentiary standard used by the School District of Palm Beach County OIG in determining whether the facts and claims asserted in the complaint were proven or disproven is based upon the preponderance of the evidence. Preponderance of the evidence is contrasted with “beyond a reasonable doubt,” which is the more severe test required to convict a criminal and “clear and convincing evidence,” a standard describing proof of a matter established to be substantially more likely than not to be true. OIG investigative findings classified as “substantiated” means there was sufficient evidence to justify a reasonable conclusion that the actions occurred and there was a violation of law, policy, rule, or contract to support the allegation. Investigative findings classified as “unfounded” means sufficient evidence to justify a reasonable conclusion that the actions did not occur and there was no violation of law, policy, rule, or contract to substantiate the allegation. Investigative findings classified as “unsubstantiated” means there was insufficient evidence to justify a reasonable conclusion that the actions did or did not occur and a violation of law, policy, rule, or contract to support the allegation could not be proven or disproven.

ATTESTATION


I, the undersigned, do hereby swear, under penalty of perjury, to the best of my personal knowledge, information, and belief, the contents of this report are true and accurate; and I have not knowingly or willfully deprived or allowed another to deprive, the subject of the investigation of any rights contained in Sections 112.532 and 112.533, Florida Statutes. This investigation was conducted pursuant to School District Policy 1.092, Inspector General, and in accordance with applicable Principles and Standards for Offices of Inspectors General as published by the Association of Inspectors General.



Angela Feaman, Investigator

**STATE OF FLORIDA
COUNTY OF PALM BEACH**

Sworn to (or affirmed) and subscribed before me this 20 day of December, 2023, by Angela Feaman, Investigator for the School District of Palm Beach County, Office of Inspector General, who is personally known by me.



Signature of Notary Public
 Notary Public or Law Enforcement Officer



This investigation was conducted by Angela Feaman, supervised and approved by Director of Investigations Oscar Restrepo and Inspector General Teresa Michael. The investigation was conducted in accordance with guidance from the Association of Inspectors General handbook and within standards as prescribed by Commission for Florida Law Enforcement Accreditation.

Supervised by: 

Oscar Restrepo, Director of Investigations

Date: 12/20/23

Approved by: 

Teresa Michael, Inspector General

Date: 12/20/23

EXHIBIT LIST

Verification of teaching experience form Exhibit 1
The document showed experience at 180 days worked. Document was submitted to HR by Sultan.

Verification of teaching experience form Exhibit 2
The document showed experience at 76 days worked. Document was submitted to HR by Lonstein.

Email communication from Anita Lonstein, Owner/Director of Ft. Lauderdale Preparatory to Hall in HR Exhibit 3
The document showed that Lonstein stated she did not fill out the form originally submitted by Sultan.

Verification of teaching experience form. Exhibit 4
The documents showed that Lelis A. Ortiz Parra, Vice President of Academic Affairs at Jose Maria Vargas University verified Sultans employment from October 15, 2018 to December 10, 2018 contradicting the number of days worked that was provided on the form that Sultan submitted to HR.

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