

OFFICE OF THE INSPECTOR GENERAL
CITY OF BALTIMORE



Isabel Mercedes Cumming
Inspector General

Investigative
Report Synopsis

OIG Case #25-0047-I

Issued: February 12, 2026



OFFICE OF THE INSPECTOR GENERAL
Isabel Mercedes Cumming, Inspector General
City Hall, Suite 635
100 N. Holliday Street
Baltimore, MD 21202



February 12, 2026

Dear Citizens of Baltimore City,

The mission of the Office of the Inspector General (OIG) is to promote accountability, efficiency, and integrity in City government, as well as to investigate complaints of fraud, financial waste, and abuse.

The OIG received a complaint regarding the use of American Rescue Plan Act (ARPA) funds for Artscape 2025. Specifically, the complaint alleged that approximately \$600,000 in City of Baltimore (City) ARPA funds were spent on music talent. The investigation found that the City used \$516,150.00 of a \$1,600,000 ARPA grant to the Baltimore Civic Fund (BCF) for music artists, including \$240,050 for Artist 1 and \$125,000 for Artist 2. The investigation revealed concerns from the Mayor's Office of Recovery Programs with the amount spent on national talent, and the amount exceeded the \$300,000 budget allocation for performance talent and the \$40,000 budget for talent booking. The OIG also found that \$582,809.02 of Artscape ARPA funds were reallocated without Board of Estimates approval, and ARPA resources were used for a VIP Reception on May 23, 2025. The OIG suggests the City develop standard operating processes for events such as Artscape to help define roles and responsibilities amongst the entities involved and to ensure the City receives the best possible cost when selecting vendors.

The OIG received City Leadership's response to the report on February 11, 2026. While the OIG strives to publish responses in full, the response contained multiple exhibits that included unredacted invoices and internal email correspondence with an Artscape vendor. Due to recent Maryland Public Information Act concerns, the OIG did not include those exhibits when publishing City Leadership's response and made minor redactions. The OIG did include the economic impact report which the response labeled as Exhibit 1. If those other exhibits are sought by the public, the OIG recommends contacting City Leadership or the Law Department directly.

Background

ARPA

The 2021 American Rescue Plan Act (ARPA) established the Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program. SLFRF provided funds to state, local, and tribal governments to address the economic and public health impacts of the COVID-19 pandemic. The City received \$641,170,126.00 through ARPA. Recipients have substantial discretion in using COVID-19 relief funds, but expenditures must fall into one of the ARPA Expenditure Categories. ARPA recipients may use a certain amount of COVID-19 relief funds to replace lost revenue for the provision of government services. According to the Department of the Treasury (Treasury), "government services" refers to "any service traditionally provided by a government unless Treasury has stated otherwise." Treasury examples of eligible Revenue Replacement projects are the maintenance, improvement, or new construction of public-school facilities; construction of new roads and other infrastructure; provision of public safety and other services; and health and educational services. The OIG learned the Treasury required the City to obligate all remaining COVID-19 relief funds by December 31, 2024.

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Baltimore Civic Fund

The Baltimore Civic Fund (BCF) is a 501(c)(3) nonprofit organization that provides the City with fiscal administration services for various initiatives exceeding \$25,000.00. BCF also facilitates the disbursement of federal, state, and philanthropic funds awarded to the City. BCF is governed by a Master Funding Agreement (Master Agreement) and a Master Agreement for Fiscal Sponsorship (Sponsorship Agreement), which the Board of Estimates (BOE) approved in April 2024.

BOPA

The Baltimore Office of Promotion & The Arts (BOPA), d.b.a. Create Baltimore, is a quasi-governmental, 501(c)(3) nonprofit agency and the City's designated arts council. It operates with City funds, sponsorships, and State funds. BOPA organized Artscape events prior to the termination of its fiscal year (FY) 2025 agreement on November 6, 2024, due to "financial situation and operational challenges." Due to the termination, the Mayor's Office requested that BOPA assist to transfer management of Artscape and other programming to the City. In June 2025, BOE approved a new BOPA agreement for FY 2026.

MORP

Mayor Brandon Scott established the Mayor's Office of Recovery Programs (MORP) in 2021 to administer the City's ARPA allocation, monitor recipients, and report to the Treasury. MORP allocates and monitors ARPA dollars sent to City agencies and other recipients. MORP Project Managers are assigned to Project Accounts to work with the City Agency implementing the ARPA project and ensure compliance with ARPA policy. The Former Chief Recovery Officer (Former CRO) transitioned to a different role and the Current Chief Recovery Officer (Current CRO) assumed CRO responsibilities during the Artscape preparation period.

Artscape

Artscape is the City's annual free outdoor arts festival. It was canceled in 2020 and 2021 due to the COVID-19 public health emergency. The 2024 Artscape was held on August 1 and 2, 2024. On December 23, 2024, BOE approved the 2025 Artscape ARPA Grant Agreement between BCF and the Mayor and City Council, acting through MORP, and authorized a grant of \$1,600,000 to BCF to provide funding support for a three-day Artscape festival. ARPA funding for the 2025 Artscape was categorized as Revenue Replacement. Artscape was held on May 24 and 25, 2025.

OIG Investigation

ARPA Justification

Mayor's Office of Recovery Programs (MORP) officials said the decision to allocate American Rescue Plan Act (ARPA) funding for Artscape 2025 occurred sometime in 2024. The former Chief Recovery Officer (Former CRO) said decisions over ARPA allocations were made by City leadership, which included the mayor. The Former CRO said what they first heard about the Artscape project was that there was a community desire to return Artscape to its pre-pandemic status, and a funding source was needed. The Former CRO said there was an understanding that the grant should go to an entity that could move money more quickly than the City due to the anticipated number of contractors that would be involved.

The Former CRO acknowledged that they were "not a big fan of Artscape" and they did not "understand

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may of the associated costs.” They stated, that in their opinion, “it’s all like, too much money to me, it doesn’t matter what the funding source is.” When asked to elaborate, the Former CRO explained they were not being critical of Artscape and that they have never lived in a place where arts is so important that it gets the eye and attention of leadership. Regarding if they would have selected Artscape for ARPA funds on her own, the Former CRO stated “probably not”, but went on to add that arts is a very critical component to the City and a committee had voiced concerns that mayoral administrations have not supported and invested in arts and culture.

The current Chief Recovery Officer (Current CRO) explained that Artscape 2025 funds were categorized as Revenue Replacement for the provision of government services. The Current CRO said Artscape qualified for the Expenditure Category because it is an activity that is regularly funded by the City. According to the Current CRO, they viewed Artscape as part of the City’s overall arts investment and noted the City’s ARPA support for local artist relief and a community arts grant.

Talent Booking

BOE approved the 2025 Artscape ARPA Grant Agreement between the Mayor and City Council and BCF on December 23, 2024 (Grant Agreement). Grant Agreement expenditures were categorized as Administrative (\$392,000), Equipment/Supplies (\$224,000), Marketing (\$112,000), or Operating (\$872,000). The budget allocated \$300,000 for Performance Talent and \$25,000 for the Booking Fee, which were Operating costs (Figure 1).

Figure 1: Artscape Talent and Booking Budget Excerpt

			FY25		
			\$1,600,000.00	\$	\$1,600,000.00
Agency	Spend Category	Description	ARPA Funding	General Funding	Total
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Festival Director	\$50,000.00		\$ 50,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Operating Manager	\$25,000.00		\$ 25,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Stage Manager	\$15,000.00		\$ 15,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Technical Manager	\$10,000.00		\$ 10,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Volunteer Coordinator	\$25,000.00		\$ 25,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Administration - Art Fair Curator	\$30,000.00		\$ 30,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Operating - Performance Talent	\$300,000.00		\$ 300,000.00
M-R: Art and Culture	SC630351: Payments to Sub-Contractors	Operating - Booking Fee	\$25,000.00		\$ 25,000.00

A Mayor’s Office Employee (MO Employee 1) was assigned to plan Artscape 2025 as the City’s agreement with the Baltimore Office of Promotion & The Arts (BOPA) was expected to be terminated. The MORP Project Manager was assigned to monitor Artscape and ensure expenditures remained within the Grant Agreement budget. BCF provided fiscal support and facilitated vendor contracts and payments. MORP witnesses explained that MO Employee 1 represented the Mayor’s Office as the “implementing agency” for the ARPA project, and BCF was an “implementation partner.” BOPA selected local vendors/performers through an online application system, oversaw local talent and assisted in planning the Mayor’s VIP Reception on May 23, 2025. A Mayor’s Office Director (MO Director) oversaw the mainstage production for Artscape 2025.

MORP witnesses said MO Employee 1 was in charge of Artscape spending decisions. MORP officials said once the Grant Agreement was executed, the MORP Project Manager was responsible for monitoring the budget and communicating any issues to the Chief Recovery Officer. The Current CRO said if MORP provided any kind of approval, it was probably based on the available budget. MO Employee 1 said because ARPA was involved, the MORP Project Manager “was the final approval on all the contracts,” and nothing was finalized without them signing off. BCF required the MORP Project Manager, MO

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Employee 1, or a Mayor’s Office employee to approve of a vendor contract before the contract could be finalized, but their approvals were informal and did not require their signatures.

The OIG found BCF emailed draft contracts and amendments to the MORP Project Manager and MO Employee 1 for their approval. The MORP Project Manager and MO Employee 1 interchangeably or together responded to sign off on contracts and changes. MO Employee 1 and MORP Project Manager stated they did not have any role in obtaining talent contracts.

The investigation revealed hospitality riders for Artscape performers containing numerous bottles of alcohol. The OIG report noted MO Employee 1 instructed the talent booking vendor (Talent Vendor) that alcohol purchases were prohibited with the funds and supporting documentation for expenses like travel and lodging would need to be provided. The OIG learned the Talent Vendor would remove travel and lodging from the invoices. The investigation was unable to confirm whether ARPA funds were used to purchase alcohol for Artscape 2025 performers because purchase receipts were not required for payment. According to the City’s response to the report, neither the City nor the Talent Vendor paid for the hospitality riders.

Talent Booking

MO Employee 1 explained that they were not involved in selecting national music talent for Artscape. MO Employee 1 believed the Mayor and MO Director booked the headliners with the Talent Vendor. MO Employee 1 said they provided the MO Director with a talent budget of \$300,000. The MO Director said they were in charge of Artscape mainstage talent. The MO Director said music artists for City festivals are selected from a list of artists provided by the mayor and the mayor’s administration. The MO Director stated, “You usually just ask the mayor, ‘Hey, anyone on your wish list? Sometimes they say yes, sometimes they say no.” The MO Director said that’s how it’s always been as far as they’ve known since at least 2009. When the MO Director was asked if they had ever planned a City festival using a funding source with spending restrictions, the MO Director said they had not and did not work with MORP for Artscape. The MO Director said they received the Artscape budget from MO Employee 1 and BOPA and then dealt with the Talent Vendor to see which music artists were available and “who fits in the budget.”

The OIG found the Talent Vendor contract of \$400,000 exceeded the Artscape budget when it was first approved in January 2025 (Figure 2). In January 2025, BCF emailed MO Employee 1 and the MORP Project Manager that the contract would exceed the ARPA Performance Talent and Booking Fee budgets together by \$75,000, and other line items would need to be adjusted. BCF informed the MORP Project Manager, “please let us know if we’re okay to move forward with this contract.” The MORP Project Manager responded that it was “OK to move forward with this contract.” The Talent Vendor contract was finalized on the same day.

Figure 2: Approved Talent Vendor Contract Budget

EXHIBIT B	
BUDGET	
Artist and all in booking fees:	
Artist #1	\$125,000.00
Artist #2	\$180,000.00
Artist #3	\$55,000.00
Talent acquisition, management, booking, and all other services to be performed by [REDACTED] pursuant to this Agreement.	\$40,000.00
Total	\$400,000.00

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The OIG found the Talent Vendor contract was amended between February and May 2025, increasing costs for headlining music artists to a total amount of \$475,500. In February 2025, BCF informed the MORP Project Manager and MO Employee 1 that the contract needed to be increased by \$45,000 to book Artist 1. MO Employee 1 replied and informed BCF to issue Artist 1’s payment as soon as possible, otherwise, we risk losing the artist. The MORP Project Manager replied it was okay to add funds, and we will modify the budget later to reflect. BCF then issued a payment of \$127,500.00 to the Talent Vendor for Artist 1’s deposit. Approximately one week later, the contract was increased by \$75,000. In May 2025, it was amended again to add a DJ fee of \$500 for Artist 1’s performance. The OIG found BCF processed payments totaling \$475,500.00 for the Talent Vendor and the five artists the Talent Vendor booked (Figure 3). Of that amount, \$240,500.00 was paid for a performance by Artist 1 and \$125,000.00 for a performance by Artist 2. Another \$40,650.00 of the ARPA grant was used to book nine other performers, for a total ARPA amount of \$516,150.00. The Talent Vendor submitted its invoices for payment, but requested five of the invoice payments go to different companies.

Figure 3: Talent Vendor Contract Payments (Source: BCF Payment Request Forms)

Payee	Service	Payment Process Date	Amount
Talent Vendor	Talent Booking	January 16, 2025	\$20,000.00
Talent Vendor	Artist 2 Performance (Invoice 1 of 2)	January 16, 2025	\$75,000.00
Talent Vendor	Artist 3 Performance (Invoice 1 of 2)	January 19, 2025	\$15,000.00
Talent Vendor	Artist 4 Performance (Invoice 1 of 2)	February 5, 2025	\$7,500.00
Talent Vendor	Artist 1 Performance (Invoice 1 of 2)	February 13, 2025	\$127,500.00
Talent Vendor	Artist 5 Performance (Invoice 1 of 2)	February 14, 2025	\$20,000.00
Talent Vendor	Talent Booking	May 22, 2025	\$20,000.00
Company 1	Artist 1 Performance (Invoice 2 of 2)	May 22, 2025	\$50,000.00
Company 2	Artist 4 Performance (Invoice 2 of 2)	May 22, 2025	\$7,500.00
Company 3	Artist 3 Performance (Invoice 2 of 2)	May 22, 2025	\$10,000.00
Company 4	Artist 5 Performance (Invoice 2 of 2)	May 22, 2025	\$10,000.00
Company 5	Artist 1 Performance (Invoice 2 of 2)	May 22, 2025	\$113,000.00
			Total: \$475,500.00

The OIG found the City did not require the Talent Vendor to apply or submit a proposal to receive the Artscape 2025 contract. MO Employee 1 said they were told that the Talent Vendor would be used for booking talent. The Current CRO explained that because the Artscape grant was categorized as Revenue Replacement for the provision of government services, the Treasury did not require grantees to follow competitive procurement rules applicable to other ARPA Expenditure Categories.

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MORP Concern

In March 2025, the MORP Project Manager wrote to the Former CRO and the Current CRO that the mayor added another artist, which put the Artscape talent line item over budget by about \$150,000. They wrote that budget modifications needed to be made. The Current CRO advised that they wanted to know what parameters could be put in place for costs related to talent and did not want to be in a situation where we are putting tens of thousands of federal dollars to pay a singer or performer. In April 2025, the Current CRO informed the Former CRO that individuals were talking about using ARPA money to pay Artist 1 \$240,000 and that they were really not okay with this. The Former CRO replied they did not want to use those funds for talent. The Current CRO wrote, “We didn’t tell them no on talent up front, so now I don’t know what grounds we have to say no now.” The Former CRO replied “phone,” which may indicate the conversation continued over a phone call.

According to the Former CRO, they were sure the question of paying Artscape performers with ARPA was raised to them as part of the overall budget but was not asked for input on specific artists. When the Current CRO was asked what they would think if a City Agency asked to use ARPA funds to pay Artist 1 or Artist 2, the Current CRO said their preference would be to use the funds for other things. The Current CRO explained the music artists are obviously highly paid, so using ARPA to compensate them requires an explanation that paying for a golf cart or tent, for example, does not.

The OIG learned typically when MORP works with a City Agency, MORP has access to invoices, payment and contractor information through Workday. MORP staff said they did not have access to the BCF billing system. The OIG learned BCF is required to contract with vendors selected by the City Agency for a given project. A BCF employee explained they would only question project spending if BCF knew the funding source would not allow the specific expense or if there was not enough money in the account.

Budget Reallocation

The Artscape Grant Agreement required BOE to approve budget reallocations of more than 25% of the total ARPA budget (\$400,000). The Current CRO explained that if a budget modification is needed, BCF should submit a written request to the Chief Recovery Officer at least 60 days before the agreement expires, even if the modification would reallocate 25% or less of the budget. The Current CRO said the Chief Recovery Officer or their designee would then approve or deny the request in writing. The OIG found \$582,809.02 of the Artscape ARPA budget was reallocated (Figure 4). Electronic records indicated the MORP Project Manager and BCF prepared documents to submit to the BOE for a budget modification in August 2025, however, a request was not brought to the Current CRO for approval nor put before BOE. The Current CRO said since the Grant Agreement expired, and they are reviewing the request to identify any next steps.

Figure 4: Artscape ARPA Budget Variance

Budget Category	ARPA Budget	ARPA Actuals	Variance
Administrative	\$392,000.00	\$281,545.00	\$110,455.00
Supplies	\$224,000.00	\$140,012.99	\$83,987.01
Marketing	\$112,000.00	\$15,037.50	\$96,962.50
Operating	\$872,000.00	\$1,163,404.51	\$291,404.51
Total	\$1,600,000.00	\$1,600,000.00	\$582,809.02

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VIP Reception

The investigation found that ARPA resources were used for Mayor Brandon Scott's VIP Reception for Artscape (VIP Reception) at The Assembly Room on May 23, 2025. BCF records indicated six vendors received direct ARPA payments totaling \$10,860.25 for VIP services. The Artscape Festival Operations Director, which received \$26,546.73 in ARPA funds and \$6,856.82 in State funds, coordinated with the Mayor's Chief of Special Events to organize the VIP Reception and assist BOPA in planning a VIP cigar lounge at the War Memorial Building during Artscape weekend. The OIG did not observe a contract for the Festival Operations Director in BCF Payment Request Forms or electronic records. Hosting the VIP Reception was included in a contract with a company (Venue Company) to provide a public venue over Artscape weekend. Venue Company's contract totaled \$15,000 for cleaning and three days of rental fees. One music artist received \$400.00 in ARPA funds to DJ the VIP Reception. When asked for an opinion on using ARPA dollars for VIP events, the Current CRO said it requires more explanation, and that's not preferable. Additionally, BOPA informed the OIG that an actress (Actress) agreed to host an invitation-only after party at a hotel following the VIP Reception on May 23, 2025, which was attended by Artscape "celebrities." The Actress's company received \$10,000.00 in ARPA funds to participate in a live, in-person panel discussion during a separate Artscape 2025 event with an optional post-panel meet-and-greet.

Investigation Findings

The OIG found the City used \$516,150.00 of a \$1,600,000 Artscape 2025 ARPA grant for music artists. Of that amount, \$240,500.00 was paid for a performance by Artist 1 and \$125,000 for a performance by Artist 2. The amount spent on music artists exceeded the \$300,000 ARPA budget allocation for performance talent and the \$40,000 budget for talent booking. The OIG found \$582,809.02 of Artscape ARPA funds were reallocated without approval from the Chief Recovery Officer or BOE. Additionally, the OIG learned that \$26,546.73 in ARPA funds were used for a VIP Reception on May 23, 2025. The OIG recommended the City develop standard operating processes for events such as Artscape to help define roles and responsibilities among the entities involved and ensure the City receives the best possible cost when selecting vendors.

Sincerely,



Isabel Mercedes Cumming
Inspector General

CC: Hon. Brandon M. Scott, Mayor of Baltimore City
Hon. Zeke Cohen, Baltimore City Council President
Hon. Bill Henry, Baltimore City Comptroller
Honorable Members of the Baltimore City Council
Hon. Ebony Thompson, Baltimore City Solicitor

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