

**From:** [Celeste Center](#)  
**To:** [Jason Brown](#)  
**Cc:** [Kristin Daniels](#); [Phil Matson](#); [Dylan Reingold](#); [Kathy Charest](#); "[helenec@indianrivered.com](mailto:helenec@indianrivered.com)"  
**Subject:** Re: Small Biz Grant application - Deborah Cooney  
**Date:** Tuesday, March 8, 2022 5:13:53 PM  
**Attachments:** [image.png](#)  
[Affidavit to document business losses.docx](#)

**CAUTION:** This message is from an external source. Please use caution when opening attachments or clicking links.

I hand-delivered the original signed and notarized document. (See attached.) Please confirm that you have received it and that you are reconsidering my application in light of this new evidence. Thanks.

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**From:** Celeste Center <celestecan@hotmail.com>  
**Sent:** Sunday, March 6, 2022 2:40 PM  
**To:** Jason Brown <jbrown@ircgov.com>  
**Cc:** Kristin Daniels <kdaniels@ircgov.com>; Phil Matson <pmatson@ircgov.com>; Dylan Reingold <dreingold@ircgov.com>; Kathy Charest <kcharest@ircgov.com>; 'helenec@indianrivered.com' <helenec@indianrivered.com>  
**Subject:** Re: Small Biz Grant application - Deborah Cooney

Dear Jason,

Please resubmit my application with the correct information: that the business losses in question were caused by the COVID-19 pandemic, namely the drop in business income from 2019 to 2020. This was already stated in the application, but apparently, you misunderstood. I am also preparing a sworn Affidavit to document this fact specifically and resolve this issue.

My pre-COVID income in 2019 was \$26,475, as shown on the income statement. My post-COVID income in 2020 was \$9,075, as shown on the income statement and the tax return. The \$17,400 drop in income was caused entirely by the COVID pandemic. This qualified my business for the grant.

The lawsuit is not related to my application, nor was it submitted with my application. Therefore, the lawsuit cannot be cited as a reason to deny the application. Nothing in the lawsuit contradicts or disproves the facts stated in the application. The lawsuit documents damages, including loss of earnings from 2008-present and future losses, from various crimes committed against me. The most damaging crimes were committed against me in 2008, 2011-12, and 2014-17, although some of the criminal activity is ongoing.

The damage losses result from a 2008 recording project that was shelved and do not include my regular performance income listed in the application. The 2008 recording project would have provided continuing royalties and better performance opportunities, as well as product

sales (CDs and downloads) totaling a conservatively estimated \$1,000,000 for 2008-2021 and \$2,000,000 for post-2021. Since the recording was never finished, it was not part of my income in 2019. Nor did the unfinished recording cause my 2020 income to drop by \$17,400. The drop in performance income between 2019 and 2020 was solely attributable to COVID.

Indian River County cannot lawfully deny my application for a federally-funded program because I have exercised my First Amendment right to file a lawsuit. Likewise, the County cannot deny the application by falsely asserting (without any evidence) that the income loss was not due to COVID, when the application certifies that the income loss was due to COVID. The County must approve the application. Please comply with law.

Thank you for your anticipated cooperation and compliance with law.

Deborah Cooney

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**From:** Jason Brown <[jbrown@ircgov.com](mailto:jbrown@ircgov.com)>

**Sent:** Friday, March 4, 2022 11:48 AM

**To:** 'celestecan@hotmail.com' <[celestecan@hotmail.com](mailto:celestecan@hotmail.com)>

**Cc:** Kristin Daniels <[kdaniels@ircgov.com](mailto:kdaniels@ircgov.com)>; Phil Matson <[pmatson@ircgov.com](mailto:pmatson@ircgov.com)>; Dylan Reingold <[dreingold@ircgov.com](mailto:dreingold@ircgov.com)>; Kathy Charest <[kcharest@ircgov.com](mailto:kcharest@ircgov.com)>; 'helenec@indianrivered.com' <[helenec@indianrivered.com](mailto:helenec@indianrivered.com)>

**Subject:** FW: Small Biz Grant application - Deborah Cooney

Ms. Cooney,

Please forgive the email response to your small business assistance applications as I do not have access to your phone number. I find that your application for assistance under the small business assistance program is not eligible due to the program requirement for business losses to be COVID related. Please see the attached complaint, filed by the applicant alleging \$1 million for loss of earnings and \$2 million for estimated future earnings losses due to the actions of the numerous defendants named. Thus it appears that you have alleged these defendants (including Indian River County and several dozen other defendants) have caused losses well in excess of the amount submitted in the applications. Therefore, my determination is that this application is not eligible for funding. If you have any questions about this determinations, please let me know.

Jason E. Brown  
County Administrator  
Indian River County  
1801 27<sup>th</sup> Street  
Vero Beach, FL 32960  
772-226-1408  
[jbrown@ircgov.com](mailto:jbrown@ircgov.com)

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**From:** Kristin Daniels  
**Sent:** Thursday, February 24, 2022 10:56 AM  
**To:** Jason Brown <jbrown@ircgov.com>  
**Cc:** Phil Matson <pmatson@ircgov.com>; Dylan Reingold <dreingold@ircgov.com>; Kathy Charest <kcharest@ircgov.com>  
**Subject:** FW: Small Biz Grant application - Deborah Cooney  
**Importance:** High

Jason,

Attached is another small business grant application from the Chamber, and Helene indicates below they have one more to send over. I'm not sure why we are just finding out about these now. Just wanted to get your thoughts before we proceed, since these applicants were not included in the number we provided to the Board.

**Kristin Daniels, CGFO**

Director - Office of Management & Budget  
Indian River County  
772-226-1214  
[kdaniels@ircgov.com](mailto:kdaniels@ircgov.com)

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**From:** [helenec@indianrivered.com](mailto:helenec@indianrivered.com) <[helenec@indianrivered.com](mailto:helenec@indianrivered.com)>  
**Sent:** Thursday, February 24, 2022 10:50 AM  
**To:** Phil Matson <[pmatson@ircgov.com](mailto:pmatson@ircgov.com)>; Kristin Daniels <[kdaniels@ircgov.com](mailto:kdaniels@ircgov.com)>; Dylan Reingold <[dreingold@ircgov.com](mailto:dreingold@ircgov.com)>  
**Cc:** Kathy Charest <[kcharest@ircgov.com](mailto:kcharest@ircgov.com)>; Andi Smith <[andis@indianrivered.com](mailto:andis@indianrivered.com)>  
**Subject:** Small Biz Grant application - Deborah Cooney  
**Importance:** High

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Good Morning

I've attached a completed Small Biz Recovery Grant application for Deborah Cooney, listed as an "entertainer". She initially submitted her application on 11/17/21, but it has taken all this time for her to access her activated SAM.gov number. The last several pages of Deborah's application reflect the musical performances in 2019 and 2020 for which she was paid, to give examples of her business activities. Please let me know if you have any questions regarding this application.

We have one more to send over, that was originally submitted to us in Oct 2021. The owner is dropping off her remaining docs today or tomorrow, including her SAM.gov info. I will send this along as soon as it is complete.

Thanks!

Helene Caseltine, CEcD  
Economic Development Director  
Indian River County Chamber of Commerce  
1216 21<sup>st</sup> Street, Vero Beach, FL 32960  
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