



February 2, 2026

Honorable Tano Tijerina
County Judge
Webb County
1110 Washington St., Suite 101
Laredo, TX 78040

Re: Webb County ARPA Program - Brighton Group Amendment #4

Dear County Judge Tejerina & County Commissioners:

On August 08, 2022, Brighton Group, LLC and Webb County came into contract for the management of Webb County's ARPA program of which was awarded \$53,736,408.00 from the federal government to appropriate to projects that comply with the US Treasury American Rescue Plan Act (ARPA) State and Local Fiscal Recovery Funds (SLFRF) eligible criteria set forth in Program Guidelines. Webb County adopted 18 projects appropriating \$38,790,353.80, as well as \$1,774,568.00 that was assigned by contract to Non-Governmental Agencies (NGO's) to provide critical services within Webb County. These ARPA projects with appropriations were adopted by Webb County and reflective in "Exhibit A" dated August 8, 2022, and Attachment #1 in our Amendment #2 executed contract on June 12, 2023. At that time the budgets assigned to Webb County's ARPA projects were estimates and not fully obligated by way of procurement and executed contracts. There was an additional \$13,171,486.20 that were unassigned and unobligated.

Since August 2022, our firm has worked with Webb County leadership, county departments, consultants, contractors and vendors to complete all scopes within executed agreements for all adopted ARPA projects that met the required criteria set forth by the US Treasury. "Amended Exhibit A" dated February 2, 2026, identifies Webb County's approved projects from the original 28 projects to 40 projects assigning a total of \$65,909,188.37 where \$53,736,408.00 came from Webb County's ARPA Award, \$5,117,291.05 from ARPA Interest Earned to date as of December 31, 2025, and \$7,055,489.32 in additional grant funding assigned to the APRA projects. The US Treasury requires full reporting of all funds assigned in part or whole to be certified by our firm and reported through all Quarterly Project & Expenditure Reports and Annual Reports submitted to the US Treasury for evaluation of the approved projects completing full project objectives as required in the SLFRF Guidelines.

Amendment #4 is required by our executed contract section 9.1.1 to reconcile the Final Webb County ARPA projects with final assigned budgets approved by Commissioners Court as listed in the "Final Amended Exhibit A" dated February 2, 2026, and reported to the US Treasury SLFRF Program as required for compliance. PO# 2023-00004820 for Project Management Services reflects 2% of the Webb County ARPA grant award of \$53,736,408.00 as agreed in the contract negotiations and required a reconciliation once the Final ARPA Projects with final assigned budgets were approved by Commissioners Court and reported to the US Treasury in compliance to the SLFRF Guidelines. We request the approval of Amendment #4 and an increase to PO#2023-00004820 by the total of \$243,455.61 that will cover the 2%

fee of the Final ARPA Project Budget Total as indicated in the "Amended Exhibit A" and with supporting documents attached and submitted by Brighton Group. We are recommending assignment of current surplus funds that were unused contingencies in existing Webb County ARPA projects that have been completed. The US Treasury SLFRF Program Guidelines allow for the reassignment of surplus funds to be used on existing ARPA Projects requiring additional funding. The current ARPA surplus is \$545,657.74 and the current ARPA Interest Earned is \$359,812.74 that is currently unassigned.

Our firm worked diligently with Webb County to assure that by the end of 2024 all available grant funds were obligated by way of court action and execution of the relevant contracts assigned to each ARPA project and no federal funds would be required to be returned to the US Treasury. Our last deadline will be to assure that all grant funding assigned would be expended and reported to the US Treasury through the final 4th Quarter Project & Expenditure Report that will be issued no later than January 31, 2027, and the Final Financial Closeout that will be required by the US Treasury that we will be assisting with. We are on course to successfully accomplish that final requirement. US Treasury will be requiring a Records Retention Period of 5 years and will be conducting Program Audits that will confirm and validate the use of all grant funds for the purpose and objectives set forth within the guidelines of the SLFRF program. Our firm will be assisting Webb County in future requests by the US Treasury with reviews, request for additional information and possible audits to assure compliance to prevent default in future federal funding designation by non-compliance with ARPA Program.

We remain committed and available to meet with yourself and designated staff as we continue to closeout ARPA program and assure compliance and any additional needs that may arise as we prepare for Financial Management closure of the ARPA Program. We will continue to be of service in the future during the review, audit and retention period set forth by the US Treasury SLFRF program. I can be directly contacted at (956) 250-7122 or by way of email at joseph@brightongroup.org.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Joseph Palacios".

Joseph Palacios
President, CEO

cc: Honorable Jesse Gonzalez, Commissioner Precinct 1
Honorable Rosaura "Wawi" Tijerina, Commissioner Precinct 2
Honorable John Galo, Commissioner Precinct 3
Honorable Ricardo A. Jaime, Commissioner Precinct 4