



**CASE
CLOSED**

Miami-Dade Commission on Ethics & Public Trust

Investigative Report

Investigator: Karl Ross

Case K15-057	Case Name: Larry Meno Jr. campaign contribution	<u>Date Open:</u>	<u>Date Closed:</u>
Complainant(s):	Subject(s): Larry Meno Jr., candidate for Homestead City Council; Steve Bateman, former Homestead mayor	Oct. 28, 2015	

Allegation(s):

On Oct. 8, COE received an email from former Homestead City Councilman Steve Losner alleging that former Homestead Mayor Steven C. Bateman made an unreported political contribution of \$1,000 to City Council candidate Larry Meno Jr., and that Meno, in turn, reported the proceeds of said contribution as a personal loan to his campaign. Meno was running for the District #2 seat on the City Council and also for Vice Mayor.

Mr. Meno lives at 2555 Dunwoodie Place, and was known to investigators because he had been recently interviewed in connection with the Judy Waldman petition drive inquiry. He has worked as a golf instructor and is manager at the Villages of Homestead clubhouse.

The case was referred to the Miami-Dade County State Attorney's Office Public Corruption Task Force, and was worked jointly with investigator Michael D'Ambrosia.

Relevant Ordinances:

Florida Statute 106.08, titled *Contributions; limitations on*, states in pertinent part that the maximum amount that can be contributed to a local political campaign is \$1,000, and that, moreover, the maximum amount of any cash contribution is \$50 per election. Statute 106.08 further states, in subsection (2)(a), that any person who makes or accepts a contribution in violation of this statute commits a misdemeanor of the first degree.

Florida Statute 106.11, titled *Expenses of and expenditures by candidates and political committees*, which states in Subsection (4) that "No candidate, campaign manager, treasurer,

deputy treasurer ... or any person acting on behalf of any of the foregoing, shall authorize any expenses, nor shall any campaign treasurer or deputy treasurer sign a check drawn on the primary campaign account for any purpose, unless there are sufficient funds on deposit in the primary depository account of the candidate or political committee to pay the full amount of the authorized expense, to honor all other checks drawn on such account, which checks are outstanding, and to meet all expenses previously authorized but not yet paid.”

Investigation:

Interviews

On Oct. 8, investigators contacted Tony Garcia, manager of the Lawrence Leo Roth campaign for the District #3 council seat. Roth was elected during the primary election cycle and did not need to enter a run-off. Garcia advised that a worker for the Roth campaign was approached by a member of Meno campaign and was asked to work absentee ballots in exchange for cash payments from an unnamed third party. Garcia also advised that he had been told about the alleged \$1,000 contribution from former Mayor Bateman to the Meno campaign. He identified the source of this information as Keeley Ehrenreich, Meno’s campaign treasurer.

In response to the information, SAO Task Force Investigator D’Ambrosia went to Homestead and made contact with the campaign worker – known only by her first name, Patricia – and attempted to get her to cooperate with the investigation. She indicated Meno recruited her to work on his campaign and arranged a meeting for later that day to take place at Shiver Glass, the family business of Florida City Councilman Roy S. Shiver. The campaign worker known as Patricia expressed to D’Ambrosia that she did not want to be involved in the investigation, and declined to work in a proactive capacity with law enforcement.

A copy of D’Ambrosia’s complete investigative memo will be added to the file.

On Oct. 19, SAO Investigator D’Ambrosia served a subpoena on Community Bank of Homestead for financial records relating to the Meno Jr. political campaign.

On Oct. 27, SAO Investigator D’Ambrosia requested video footage from Community Bank of Homestead of the transaction in question involving the \$1,000 campaign “loan.” The footage, later reviewed by investigators, showed Meno made a counter deposit of \$1,000 in cash prior to depositing the personal check into his campaign account as a “loan.” No surveillance video was available of the parking lot on September 22, the day of the deposit.

On Dec. 1, SAO Investigator D’Ambrosia contacted Meno’s campaign treasurer, Keeley Ehrenreich, and requested she appear for an interview at the Barnes and Noble on Kendall Drive at 1:30 p.m. on Dec. 3. She initially agreed, but later stated that due to a medical appointment she would prefer to meet at the Starbuck’s on US 1 and SW 312th Street.

On Dec. 3, investigators re-contacted Tony Garcia at (786) 486-4048, who advised that he was contacted by Ehrenreich by telephone several days before talking to investigators back on Oct.

8, and that she told him about an encounter with former Mayor Bateman at the local Walmart in which Bateman allegedly told her he gave \$1,000 in cash to Meno Jr., and that Meno intended to report the cash as a loan from himself to the campaign. He said that she had since that time had a falling out with Meno and that she knew the cash contribution was improper. He said that this happened shortly before Ehrenreich left on vacation to Europe. (Note: The CTR for the period in question shows that Meno, not Ehrenreich, signed as treasurer.) He said he could probably find a record of the conversation on his cell phone statement.

Keeley Ehrenreich, former campaign treasurer
Larry Meno Jr. political campaign
Homestead, FL
Dec. 3, 2015

Ms. Ehrenreich appeared for a voluntary statement at the Starbucks at US 1 and SW 312th Street in Homestead, where she met with investigators Ross and D'Ambrosia. She said that she worked "very briefly" as treasurer for Meno's campaign. She said Meno is a neighbor and asked her to serve as treasurer because he said she was one of the few people he knew that could be trusted with money. She said she decided to leave the campaign after about three weeks in mid-September because of what she considered to be "shady" behavior. "When you see red flags, you walk away." In particular, she stated she was unnerved by a conversation she had with former Mayor Bateman during a chance encounter at a Walgreens on Canal Street. She said that Bateman told her he was raising money for Meno and had gotten a couple of people to make donations. She said that Meno's campaign was struggling for donations because he was running against a popular incumbent, Jon Burgess.

She said Meno would complain that a lot of people wouldn't contribute to his campaign because they didn't want to upset Burgess. Ehrenreich stated that Bateman never explicitly told her he was going to himself give money to the campaign, but she did say that after she saw the \$1,000 loan reported on Meno's CTR, she suspected that Bateman may have been the source of the funds and that she shared this suspicion with Tony Garcia, whom she has known since grade school. She said she only prepared three CTRs for Meno. She said she would go online to the City Clerk's webpage and make sure Meno stopped using her name his CTRs.

With respect to the encounter with Bateman, she recalled Bateman telling her: "I'm helping Larry. I got a couple of donors and a couple of people to put up signs on their property." She said Meno previously served as Bateman's campaign manager and "bodyguard." She said the latter arrangement was seen as something of "a joke" because nobody knew Meno to have any training in that capacity. "He's just the neighborhood bully, basically," she said.

Ehrenreich further stated she didn't think Meno had \$1,000 to loan to his campaign because he would frequently complain about not having money, adding that he earned about \$40,000 a year as manager of the clubhouse and wouldn't have that kind of money lying around. She said he had his campaign printing done by a friend, "Boomer" Gonzalez.

Thomas Sytsma, owner
Impact Signs, 105 NE 3rd Road, Homestead, FL

Phone: (305) 245-9131

Jan. 12, 2016

A copy of the interview notes and report prepared by SAO Investigator D'Ambrosia are included below, as follows:

The interview took place on the west side of the office building initially and Sytsma and his Office Manger Carol Lent stated in substance the following:

- That he had received the subpoenas previously and due to a computer system "crash" at his business he was unable to comply sooner, however, he and his office manager had searched the records database for the invoices in question and had located them.
- That Sytsma's office manager (Carol Lent) was in the process of printing out the invoices made out for a purchase by the Lawrence Meno Jr. Campaign and would turn them over immediately.
- That Sytsma had personally interacted with Lawrence Meno (Jr.) on the orders.
- That there were three (3) orders for signage and that Meno had paid by campaign check for the first two (2) order and by check on the third order, but on the third order the check came a couple of days after the order was placed.
- Sytsma stated that collecting the payment a few days after the order was not normally his practice as he had experiences with previous campaigns that he had lost payments on (though he would not state who or which campaigns) and that it was his policy to get payment immediately. However, he allowed Meno to pay days afterwards due to his connectivity to a family friend he identified as Glenda Wright (AKA Glenda Dykes-Wright was her married name) who had directed Meno to Impact Sign Company, so he allowed Meno to pay thereafter by check. It was not determined if Meno had initiated any conversation about "floating" the payment or if such a conversation ever took place, simply that Sytsma allowed the last invoice to be paid a "couple of days later".
- Sytsma stated that it was a "straight forward" purchase with no issues on his part that he was aware of.
- Sytsma then directed D'Ambrosia and Ross to his Office Manger Carol Lent, W/H/F, and approximately 25 years of age. Lent was personally contacted by the investigators and interviewed about the invoices which she had recovered from the computer system and provided.
- Lent stated that normally the payments are entered into the computer system once received to clear the invoiced purchase but she had only taken over as the office manager for approximately a month and though she was familiar with the accounting system, she was unsure of how or when any charges were cleared in the system. Lent stated that she tried to clear them as soon as they were received.
- Lent had not interacted with Meno at any time.

The records printed from the business computer system by Lent were as follows:

1. Invoice 6910	Dated 09-16-2015	Bill To: Larry Meno	Amount Total 906.83
2. Invoice 6930	Dated 09-16-2015	Bill To: Larry Meno	Amount Total: \$588.50
3. Invoice 6995	Dated 11-02-2015	Bill To: Larry Meno	Amount Total: \$191.00

All items purchased were for signage for the Meno political campaign.

Document/Audio/Video Review:

On Oct. 12, investigators obtained qualifying papers for the Larry Meno Jr. campaign for Homestead City Council. Among the documents obtained was an Appointment of Campaign Treasurer form showing Keeley Ehrenreich, a neighbor of Meno's on Dunwoodie Place, was appointed to serve as his campaign treasurer. The form was dated August 4, 2015.

On Oct. 27, a review of bank records obtained pursuant to the subpoena showed that on Sept. 22, 2015, the candidate Meno wrote a personal check (No. 1026) to his campaign in the amount of \$1,000. It was deposited into the campaign account at 12:27 p.m.

Records further revealed that on or about Oct. 1, 2015, David Berrones – a business partner of former Mayor Bateman in a real estate venture – made a \$500 contribution to Meno.

Copies of Meno's campaign treasurer's reports were reviewed for the period from Aug. 1, 2015, though September 25, 2015. They reflected that Meno received \$1,300 in contributions from supporters, including a \$75 check from his treasurer on Sept. 5, and that on Sept. 22, he allegedly loaned his campaign \$1,000, for a total of \$2,300 in contributions.

Worth noting is that on Sept. 23, Meno paid \$906.83 to Impact Sign for 4x8 campaign signs, and that, absent the \$1,000 "loan," Meno would not have been able to pay for the materials, given that his account balance at the time was \$638.45, according to the CTRs.

On Jan. 13, copies of invoices from Impact Signs obtained pursuant to an SAO subpoena were examined along with campaign financial records, showing that the Meno campaign lacked sufficient funds on hand at the time orders were placed on Sept. 16 for campaign materials. Bank records show an account balance of \$327.50 on that date, when Meno personally placed orders for campaign materials in the amounts of \$906.83 and \$588.50. Additional bank records for the campaign account are necessary to determine whether a further possible violation of Chapter 106 occurred at the time the final order was placed with Impact signs in November. Those records have already been requested from the financial institution.

On Jan. 14, copies of the Meno campaign bank statement were reviewed for October and November, showing that the campaign account did have sufficient funds on or about Nov. 2, to cover the final order placed with Impact Signs in the amount of \$191.

Conclusion(s):

Based on the above findings, it was not possible to document the origin of the \$1,000 loan that Meno made to his political campaign on September 22. Meno claimed to investigators that the money was his and that he kept such sums lying around his home in case of emergency.

With respect to the orders for campaign materials from Impact Signs, the investigation found Meno placed two orders on Sept. 16 with Impact in the amounts of \$906.83 and \$588.50, and that his campaign bank account had a balance of only \$327.50 on that date.

It would appear that the "loan" of \$1,000 to Meno's campaign arrived just in time to enable Meno to pick up his materials on the first order in the amount of \$906.83. CTRs show that subsequent deposits enabled him to pay for the second order at a later date.

Based on the foregoing, there is reason to believe that Meno violated F.S. 106.11(4), which requires that "no candidate ... shall authorize any expenses, nor shall any campaign treasurer or deputy treasurer sign a check drawn on the primary campaign account for any purpose, unless there are sufficient funds on deposit in the primary depository account of the candidate or political committee to pay the full amount of the authorized expense."

The Miami-Dade State Attorney's Office has indicated it will decline criminal prosecution and/or referral to the Florida Elections Commission.

Upon consultation with the Ethics Advocate, the matter was closed with no further action.

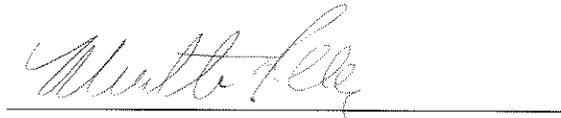


Karl Ross, COE Investigator

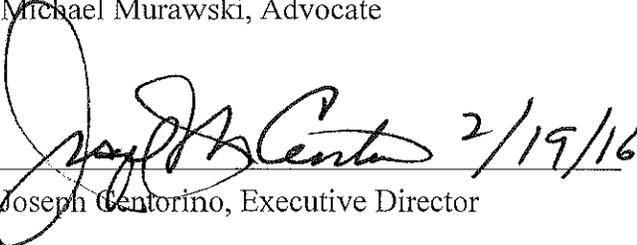
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