



**PALM BEACH COUNTY COMMISSION ON ETHICS**  
300 North Dixie Highway, Suite 450, West Palm Beach, Florida 33401  
Hotline: 877-766-5920 or 561-355-1915

**SELF-INITIATED COMPLAINT**

As a self initiated complaint, this matter is deemed as LEGALLY SUFFICIENT under Section 2-260(b)(2), Procedure on Complaints Filed, Legal sufficiency of complaints, of the PBC Commission on Ethics Ordinance.

**1. Ordinance and section(s) for offense(s) alleged:**

Code of Ethics

Section 2-443(d) Prohibited Conduct: Contractual Relationships

**2. Complainant – Commission on Ethics Executive Director**

E-Mail: [ethics@palmbeachcountyethics.com](mailto:ethics@palmbeachcountyethics.com)

Phone No #: 561-355-1915

**3. Respondent**

Name: Gordon Eaton

E-Mail:

Address: 50 NW 1st Avenue

City: Delray Beach

Zip Code: 33444

Home #:

Work #: 561-243-7250

Cell #:

Title/Office Held or Sought: Employee-Parks and Recreation Department

**3. IF KNOWN, CHECK THE BOX OR BOXES THAT APPLY**

- ☒ Allegation is against person in County/Municipal Government  
☐ Allegation is about County/Municipal Whistleblower Retaliation  
☐ Allegation is against a Vendor, Lobbyist, or a Principal of a Lobbyist

**4. STATEMENT OF FACTS ATTACHED**

Exhibit 1 – Memorandum of Inquiry

Exhibit 2 – Affidavit

Exhibit 3 – Supporting Documentation

**5. OATH**

STATE OF FLORIDA  
COUNTY OF PALM BEACH

Personally known to me and appeared before me, Mark E. Bannon, Interim Executive Director of the Palm Beach County Commission on Ethics, whose signature appears below, being duly sworn, says that the allegations set forth in this complaint are based upon facts which have been sworn to as true by a material witness or witnesses and which if true would constitute the offenses alleged and that this complaint is instituted in good faith. Signed and sworn to on this 4th day of December, 2015.



GINA LEVESQUE  
MY COMMISSION # EE 207356  
EXPIRES: July 17, 2016  
Bonded Thru Budget Notary Services

Mark E. Bannon, Interim Executive Director

*Gina Levesque*  
(Signature of Notary Public, State of Florida)

(Print, Type, or Stamp Commissioned  
Name of Notary Public)

PALM BEACH COUNTY COMMISSION ON ETHICS  
**MEMORANDUM OF INQUIRY**

To: Mark Bannon, Interim Executive Director  
From: Anthony C. Bennett, Investigator  
Re: AN15-024 – Gordon Eaton, Parks and Recreation, City of Delray Beach

- **Background**

This matter came to the attention of the Commission on Ethics (COE) staff via a letter dated May 19, 2015 from Mr. Donald Cooper (Complainant), City Manager of Delray Beach (the City), addressed to the COE Executive Director. According to the letter, the City tasked external auditors with comparing City employee contact information to City vendor contract information to see if there were possible employee conflicts. The audit reviewed those vendors who conducted business with the City from 2011 to present.

A separate document was attached which listed a number of names of individuals that were apparently employees of the City. City Employee Gordon Eaton (Respondent), Delray Beach Parks and Recreation, was listed as being employed by Tropical Landscapers, Inc., a company determined to be a vendor of the City from 2010 through 2014. A total of \$1,364.00 was paid to this vendor during this period. Complainant alleges due to Mr. Eaton being employed by Tropical Landscapers, Inc. he may be in violation of Section 2-443(d) of the PBC Code of Ethics Ordinance as he is also an employee of the City.

The following documents were provided with the letter and submitted to the file:

- **Documents provided by Complainant**

1. Complainant Letter outlining the allegation(s) made. (1 page)
2. Spreadsheet of City employees working as alleged vendors of the City. (13 pages)

- **Applicable Law**

The Following section of the PBC Commission on Ethics Ordinance establishes jurisdiction in this matter:

**Sec. 2-254. Creation and jurisdiction.**

The Palm Beach County Commission on Ethics (hereinafter "commission on ethics") is hereby established. The jurisdiction of the commission on ethics shall extend to *any person required to comply with the countywide code of ethics*, the county lobbyist registration ordinance, and the county post-employment ordinance... (Emphasis added)

The following portions of the PBC Code of Ethics ordinance are relevant to this matter:

**Section 2-442. Definitions.**

**Official or employee means any official or employee of the county or the municipalities located within the county**, whether paid or unpaid. The term "employee" includes but is not limited to all managers, department heads and personnel of the county or the municipalities located within the county... The term "official" shall mean members of the board of county commissioners, *a mayor*, members of local municipal governing bodies, and members appointed by the board of county commissioners, members of local municipal governing bodies or mayors or chief executive officers that are not members of local municipal governing body, as applicable, to serve on any advisory, quasi judicial, or any other board of the county, state, or any other regional, local, municipal, or corporate entity. (Emphasis added)

**Vendor** means any person or entity who has a pending bid proposal, or offer or request to sell goods or services, sell or lease real or personal property, or who currently sells goods or services, or sells or leases real or personal property, to the county or municipality involved in the subject contract or transaction as

applicable. For the purposes of this definition a vendor entity includes an owner, director, manager or employee.

As a an employee of the City of Delray Beach within the Parks and Recreation Department, Gordon Eaton is under the jurisdiction of the Palm Beach County Code of Ethics and the COE.

**Sec. 2-443. Prohibited conduct.**

- (d) ***Contractual relationships.*** No official or employee shall enter into any contract or other transaction for goods or services with their respective county or municipality. This prohibition extends to all contracts or transactions between the county or municipality as applicable or any person, agency or entity acting for the county or municipality as applicable, and the official or employee, directly or indirectly, or the official or employee's outside employer or business. Any such contract, agreement, or business arrangement entered into in violation of this subsection may be rescinded or declared void by the board of county commissioners pursuant to section 2-448(c) or by the local municipal governing body pursuant to local ordinance as applicable. This prohibition shall not apply to employees who enter into contracts with Palm Beach County or a municipality as part of their official duties with the county or that municipality. This prohibition also shall not apply to officials or employees who purchase goods from the county or municipality on the same terms available to all members of the public. (Emphasis added)

- **Inquiry:**

Respondent has been an employee of the City of Delray Beach since 2007 within the Parks and Recreation Department. This was verified by documents forwarded by Complainant which listed him as an employee. In the submitted spreadsheet, Respondent is also listed as the representative for the City vendor, Tropical Landscapers, Inc. The spreadsheet shows the following payouts to this company between the dates of June 2010 through May 2014:

| P.O. Number | Vendor No. | Amount     | Check Date | Check Number | Approved |
|-------------|------------|------------|------------|--------------|----------|
| 667139      | 22580      | \$375.00   | 6/4/2010   | 450745       | Karch    |
| 684107      | 22580      | 800.00     | 8/3/2012   | 477463       | Karch    |
| 698313      | 22580      | 189.00     | 5/16/2014  | 497888       | Davis    |
|             |            |            |            |              |          |
| Total       | 3          | \$1,364.00 |            |              |          |

The amount totaled \$1,364.00 over the course of three (3) payments between 2010 and 2014.

I researched the business name Tropical Landscapers Inc. on the Florida Department of State Division of Corporations website and found the company was in an "Inactive" status as of 9/25/2015. The Registered Agent was listed as Jason Kleinrichert. Respondent's name was not listed in this section.

Within the Articles of Incorporation, again Mr. Jason Kleinrichert was listed as the President and Registered Agent and Catherine Kleinrichert was listed as the Vice President. These documents were signed and dated on 5/24/1995. Respondent's name was not found to be listed on these documents. However, based on the documents received from the City, Respondent was found to be listed as employed by the company Tropical Landscapers Inc.

- **Documents submitted by Investigator**

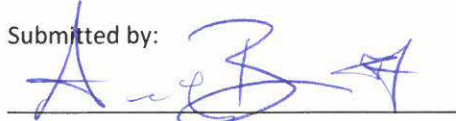
1. Articles of Incorporation – Florida Department of State Division of Corporations. (8 pages)
2. 2012 Florida Limited Liability Company Annual Report. (1 page)
3. 2014 For Profit Corporation Reinstatement. (1 page)
4. Florida Department of State Division of Corporations Company Listing. (2 pages)

- **Recommendation**

After reviewing the background information, the documents submitted by Complainant, witness statements, and the applicable law, I believe that there is sufficient evidence that would indicate, Respondent may have violated PBC Code of Ethics §2-443(d), ***Contractual Relationships***.

Therefore, it is my recommendation that the COE Executive Director file a sworn complaint on Gordon Eaton pursuant to Section 2-260(a)(2), ***Procedure on Complaints Filed*** of the PBC Commission on Ethics Ordinance and request that a the formal investigation begin.

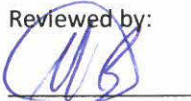
Submitted by:



Anthony C. Bennett, Investigator  
PB County Commission on Ethics

12/1/2015  
Date

Reviewed by:



(Initials)

12/1/2015  
Date



# PALM BEACH COUNTY COMMISSION ON ETHICS

## AFFIDAVIT

Re: AN 15-024 - Gordon Eaton

Commission on Ethics (COE) staff received copies of various documents from Mr. Donald Cooper, City Manager of Delray Beach, alleging Gordon Eaton possibly violated Section 2-443(d) *Prohibited Conduct: Contractual Relationships*, of the PBC Code of Ethics.

Based on the information obtained, the City of Delray Beach (the City) tasked external auditors with comparing employee contact information to vendor contract information to see if there were possible employee conflicts. The audit reviewed those vendors who conducted business with the City dating from 2011 to the present. Names of individuals that were employees of the City included Gordon Eaton.

In a spreadsheet submitted by the City to COE staff, Gordon Eaton is listed as the employee of City vendor Tropical Landscaper's, Inc. The spreadsheet shows a total of \$1,364 being paid out to this company from 2010 through 2014.

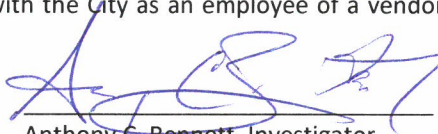
However, Section 2-260.8, Statutes of limitations, of the COE Ordinance states: "No action may be taken on a complaint filed more than two (2) years after the violation is alleged..." (Emphasis added). Due to the length of time in which the possible violations may have occurred, the allegations will only include the time period of December 03, 2013 through December 3, 2015.

Based on the information submitted and obtained during the Inquiry, Gordon Eaton is an employee of the City and an employee of Tropical Landscapers, Inc., which was a vendor of the City during the included time period.

Section 2-443(d), *Prohibited Conduct: Contractual Relationships* states: "No official or employee shall enter into any contract or other transaction for goods or services with their respective county or municipality. This prohibition extends to all contracts or transactions between the county or municipality as applicable or any person, agency or entity acting for the county or municipality as applicable, and the official or employee, directly or indirectly, or the official or employee's outside employer or business." (Emphasis added) If true and Eaton is an employee of the City while being an employee of a vendor of the City, he would be in violation of this section of the Code of Ethics.

Therefore, substantial relevant evidence exists to show that Gordon Eaton, while an employee of the City of Delray Beach during 2013-2015, entered into contracts with the City as an employee of a vendor that accepted \$189 in payments for work rendered.

By:

  
Anthony C. Bennett, Investigator  
PBC Commission on Ethics

STATE OF FLORIDA  
COUNTY OF PALM BEACH

The foregoing instrument was sworn to (or affirmed) and subscribed before me this 3<sup>rd</sup> day of December, 2015 by Anthony C. Bennett, who is personally known to me.



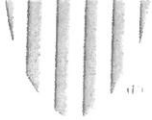
GINA LEVESQUE  
MY COMMISSION # EE 207356  
EXPIRES: July 17, 2016  
Bonded Thru Budget Notary Services

  
Signature of Notary Public

# CITY OF DELRAY BEACH



All-America City May 19, 2015



1993  
2001

Steven P. Cullen  
Executive Director  
Palm Beach County Commission on Ethics  
300 North Dixie Highway, Suite 450  
West Palm Beach, FL 33401

Dear Mr. Cullen:

The City of Delray Beach had requested our external auditors compare employee contact information to vendor contact information to see if there were any employee conflicts. The attached list shows vendors with the same address or similar data point as an employee who have done business with the city since 2011, in apparent violation of Palm Beach County Code of Ethics Ordinance Section 2.443(d). One of the vendors, American Traffic Products, is currently under investigation by the Public Corruption Unit of the State Attorney.

For any additional information, please contact me by phone (561-243-7015) or email ([cooperd@mydelraybeach.com](mailto:cooperd@mydelraybeach.com)).

Sincerely,

Donald Cooper  
City Manager, City of Delray Beach

C: D. Burfield, Office of the State Attorney ([dburfield@sa15.org](mailto:dburfield@sa15.org))  
John A. Carey, Palm Beach County Inspector General ([inspector@pbcgov.org](mailto:inspector@pbcgov.org))  
Noel Pfeffer, City Attorney  
Jack Warner, Chief Financial Officer

| Last Name | First     | Department | Hire Date  | Vendor Name                         | Total      | Last Date  | Ethics<br>Conflict | Common             |
|-----------|-----------|------------|------------|-------------------------------------|------------|------------|--------------------|--------------------|
| Lancaster | Desiree   | Fire       | 12/20/2004 | PHOENIX PRESSURE CLEANING LLC       | 5,071.54   | 05/11/2015 | Yes                | Addresses the same |
| Lang      | Joseph    | Fire       | 12/08/1992 | Lang First Response - CPR Services  | 25,191.98  | 02/13/2015 | Yes                | Addresses the same |
| Itizary   | Cesar     | ESD        | 12/17/1990 | AMERICAN TRAFFIC PRODUCTS SRVCS INC | 230,313.39 | 11/14/2014 | Yes                | Addresses the same |
| Swanson   | Steven    | Police     | 11/08/2000 | DELRAYS FINEST SIGNS & GRAPHICS LLC | 10,033.00  | 07/25/2014 | Yes                | Same name          |
| Eaton     | Gordon    | Parks      | 03/19/2007 | TROPICAL LANDSCAPERS INC            | 1,364.00   | 05/16/2014 | Yes                | Same phone number  |
| Devery    | Conor     | Fire       | 05/31/2005 | First Response Training             | 2,245.00   | 02/07/2014 | Yes                | Addresses the same |
| Mcalley   | Fredrick  | Fire       | 02/21/1989 | Mac Productions                     | 625.00     | 4/19/2013  | Yes                | Same phone number  |
| Lynch     | Todd      | Fire       | 06/14/1999 | Game on Fitness                     | 755.00     | 03/15/2013 | Yes                | Same name          |
| Ulysse    | Jacquelyn | Finance    | 11/20/2006 | Wilbert Ulysse                      | 1,429.25   | 08/24/2012 | Yes                | Addresses the same |
| Wintemute | James     | Police     | 01/25/1988 | Force E                             | 19,845.30  | 05/11/2012 | Yes                | Same name          |

Vendor Name: TROPICAL LANDSCAPERS INC  
Employee Name: Gordon Eaton

Hire Date: 3/19/2007

Department: Parks and Recreation

Type: Plants

| P.O. Number | Vendor No | Amount   | Check Date | Check Number | Approved |
|-------------|-----------|----------|------------|--------------|----------|
| 667139      | 22580     | 375.00   | 6/4/2010   | 450745       | Karch    |
| 684107      | 22580     | 800.00   | 8/3/2012   | 477463       | Karch    |
| 698313      | 22580     | 189.00   | 5/16/2014  | 497888       | Davis    |
| Total       | 3         | 1,364.00 |            |              |          |



## FLORIDA DEPARTMENT OF STATE DIVISION OF CORPORATIONS



### Detail by Entity Name

#### Florida Profit Corporation

TROPICAL LANDSCAPERS, INC.

#### Filing Information

|                             |                                     |
|-----------------------------|-------------------------------------|
| <b>Document Number</b>      | P95000043624                        |
| <b>FEI/EIN Number</b>       | 65-0591065                          |
| <b>Date Filed</b>           | 05/30/1995                          |
| <b>State</b>                | FL                                  |
| <b>Status</b>               | INACTIVE                            |
| <b>Last Event</b>           | ADMIN DISSOLUTION FOR ANNUAL REPORT |
| <b>Event Date Filed</b>     | 09/25/2015                          |
| <b>Event Effective Date</b> | NONE                                |

#### Principal Address

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

Changed: 03/30/2009

#### Mailing Address

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

Changed: 03/30/2009

#### Registered Agent Name & Address

KLEINRICHERT, JASON  
11187 90TH STREET SOUTH  
BOYNTON BEACH, FL 33472

Address Changed: 03/30/2009

#### Officer/Director Detail

##### **Name & Address**

Title PD

KLEINRICHERT, JASON  
11187 90TH STREET SOUTH  
BOYNTON BEACH, FL 33472



## Title VPS

KLEINRICHERT, CATHERINE  
11187 90TH STREET SOUTH  
BOYNTON BEACH, FL 33472

**Annual Reports**

| <b>Report Year</b> | <b>Filed Date</b> |
|--------------------|-------------------|
| 2012               | 06/08/2012        |
| 2013               | 12/11/2013        |
| 2014               | 10/22/2014        |

**Document Images**

|                                                       |                                          |
|-------------------------------------------------------|------------------------------------------|
| <a href="#">10/22/2014 -- REINSTATEMENT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">12/11/2013 -- REINSTATEMENT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">06/08/2012 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">02/24/2011 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">02/18/2010 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">03/30/2009 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">03/06/2008 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">07/09/2007 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">01/27/2006 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">06/30/2005 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">01/07/2004 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">02/17/2003 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">02/05/2002 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">03/19/2001 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">07/17/2000 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">03/09/1999 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">07/07/1998 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">04/29/1997 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">07/01/1996 -- ANNUAL REPORT</a>           | <a href="#">View image in PDF format</a> |
| <a href="#">05/30/1995 -- DOCUMENTS PRIOR TO 1997</a> | <a href="#">View image in PDF format</a> |

99500043604

TRANSMITTAL LETTER

Department of State  
Division of Corporations  
P. O. Box 6327  
Tallahassee, FL 32314

FILED  
5/31/95 PM 6:05  
TALLAHASSEE, FLORIDA  
RECEIVED

SUBJECT: Tropical Landscapers, Inc.  
(Proposed corporate name - must include suffix)

Enclosed is an original and one (1) copy of the articles of incorporation and a check for :

☐ \$70.00  
Filing Fee

☐ \$78.75  
Filing Fee  
& Certificate

☐ \$122.50  
Filing Fee  
& Certified Copy

☒ \$131.25  
Filing Fee,  
Certified Copy  
& Certificate

Additional Copy Required

FROM: Jason Kleinrichert  
Name (printed or typed)

3545 Marlow Avenue  
Address

Boynton Beach, Fl. 33436  
City, State & Zip

(407) 369-2899  
Daytime Telephone number

400001502064  
-05/31/95--01060--011  
\*\*\*131.25 \*\*\*131.25

6/7/95  
PB

NOTE: Please provide the original and one copy of the articles.

## ARTICLES OF INCORPORATION

*The undersigned incorporator(s), for the purpose of forming a corporation under the Florida Business Corporation Act, hereby adopt(s) the following Articles of Incorporation.*

FILED  
JAN 10 1995  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

### ARTICLE I NAME

The name of the corporation shall be:

Tropical Landscapers, Inc.

### ARTICLE II PRINCIPAL OFFICE

The principal place of business and mailing address of this corporation shall be:

3545 Marlow Avenue  
Boynton Beach, Fl. 33436

### ARTICLE III SHARES

The number of shares of stock that this corporation is authorized to have outstanding at any one time is:

5,000

### ARTICLE IV INITIAL REGISTERED AGENT AND STREET ADDRESS

The name and address of the initial registered agent is: Jason Kleinrichert

3545 Marlow Avenue  
Boynton Beach, Fl. 33436

**ARTICLE V INCORPORATOR(S)**

**See instructions for officers/directors**

The name(s) and street address(es) of the incorporator(s) to these Articles of Incorporation is(are):

Jason Kleinrichert - President  
3545 Marlow Avenue  
Boynton Beach, Fl. 33436

Catherine Kleinrichert - V. President & Secretary  
3545 Marlow Avenue  
Boynton Beach, Fl. 33436

The undersigned incorporator(s) has(have) executed these Articles of Incorporation this

24 day of May, 19 95.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

**NOTE: Affixing an officer title after a signature of an incorporator does not constitute the designation of officers.**

**CERTIFICATE OF DESIGNATION OF  
REGISTERED AGENT/REGISTERED OFFICE**

PURSUANT TO THE PROVISIONS OF SECTION 607.0501, FLORIDA STATUTES, THE  
UNDERSIGNED CORPORATION, ORGANIZED UNDER THE LAWS OF THE STATE OF  
FLORIDA, SUBMITS THE FOLLOWING STATEMENT IN DESIGNATING THE REGISTERED  
OFFICE/REGISTERED AGENT, IN THE STATE OF FLORIDA.

FILED  
CLERK OF COURT  
TALLAHASSEE  
JAN 29 1995

1. The name of the corporation is: Tropical Landscapers, Inc.

2. The name and address of the registered agent and office is:

Jason Kleinrichert  
(NAME)

3545 Marlow Avenue  
(P.O. Box or Mail Drop Box **NOT** ACCEPTABLE)

Boynton Beach, Fl. 33436  
(CITY/STATE/ZIP)

*Having been named as registered agent and to accept service of process for the above stated corporation at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.*

  
(SIGNATURE)

5-29-95  
(DATE)



## TRANSMITTAL LETTER

Department of State  
Division of Corporations  
P. O. Box 6327  
Tallahassee, FL 32314

SUBJECT: Tropical Landscapers, Inc.  
(Proposed corporate name - must include suffix)

Enclosed is an original and one (1) copy of the articles of incorporation and a check for :

☐ \$70.00  
Filing Fee

☐ \$78.75  
Filing Fee  
& Certificate

☐ \$122.50  
Filing Fee  
& Certified Copy

☒ \$131.25  
Filing Fee,  
Certified Copy  
& Certificate

Additional Copy Required

FROM: Jason Kleinrichert  
Name (printed or typed)

3545 Marlow Avenue  
Address

Boynton Beach, Fl. 33436  
City, State & Zip

(407) 369-2899  
Daytime Telephone number

NOTE: Please provide the original and one copy of the articles.

## ARTICLES OF INCORPORATION

*The undersigned Incorporator(s), for the purpose of forming a corporation under the Florida Business Corporation Act, hereby adopt(s) the following Articles of Incorporation.*

FILED  
SECRETARY OF STATE  
JAN 3 1985  
TALLAHASSEE, FLORIDA

### ARTICLE I NAME

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Tropical Landscapers, Inc.

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3545 Marlow Avenue  
Boynton Beach, Fl. 33436

### ARTICLE III SHARES

The number of shares of stock that this corporation is authorized to have outstanding at any one time is:

5,000

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3545 Marlow Avenue  
Boynton Beach, Fl. 33436

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**See instructions for officers/directors**


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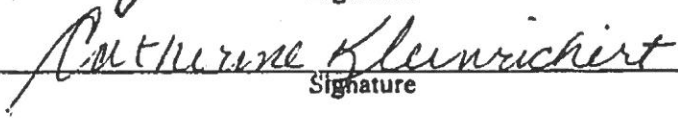
Jason Kleinrichert - President  
3545 Marlow Avenue  
Boynton Beach, Fl. 33436

Catherine Kleinrichert - V. President & Secretary  
3545 Marlow Avenue  
Boynton Beach, Fl. 33436

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24 day of May, 19 95.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

**NOTE: Affixing an officer title after a signature of an incorporator does not constitute the designation of officers.**

**CERTIFICATE OF DESIGNATION OF  
REGISTERED AGENT/REGISTERED OFFICE**

PURSUANT TO THE PROVISIONS OF SECTION 607.0501, FLORIDA STATUTES, THE UNDERSIGNED CORPORATION, ORGANIZED UNDER THE LAWS OF THE STATE OF FLORIDA, SUBMITS THE FOLLOWING STATEMENT IN DESIGNATING THE REGISTERED OFFICE/REGISTERED AGENT, IN THE STATE OF FLORIDA.

1. The name of the corporation is: Tropical Landscapers, Inc.

2. The name and address of the registered agent and office is:

Jason Kleinrichert  
(NAME)

3545 Marlow Avenue  
(P.O. Box or Mail Drop Box **NOT** ACCEPTABLE)

Boynton Beach, Fl. 33436  
(CITY/STATE/ZIP)

*Having been named as registered agent and to accept service of process for the above stated corporation at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.*

  
(SIGNATURE)

5-29-95  
(DATE)

DIVISION OF CORPORATIONS, P. O. BOX 6327, TALLAHASSEE, FL 32314

# 2012 FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P95000043624

FILED  
Jun 08, 2012  
Secretary of State

Entity Name: TROPICAL LANDSCAPERS, INC.

**Current Principal Place of Business:**

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

**New Principal Place of Business:**

**Current Mailing Address:**

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

**New Mailing Address:**

FEI Number: 65-0591065

FEI Number Applied For ( )

FEI Number Not Applicable ( )

Certificate of Status Desired ( )

**Name and Address of Current Registered Agent:**

KLEINRICHERT, JASON  
11187 90TH STREET SOUTH  
BOYNTON BEACH, FL 33472 US

**Name and Address of New Registered Agent:**

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

**OFFICERS AND DIRECTORS:**

Title: PD  
Name: KLEINRICHERT, JASON  
Address: 11187 90TH STREET SOUTH  
City-St-Zip: BOYNTON BEACH, FL 33472

Title: VPS  
Name: KLEINRICHERT, CATHERINE  
Address: 11187 90TH STREET SOUTH  
City-St-Zip: BOYNTON BEACH, FL 33472

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: CATHERINE KLEINRICHERT

VPS

06/08/2012

Electronic Signature of Signing Officer or Director

Date



# 2014 FOR PROFIT CORPORATION REINSTATEMENT

DOCUMENT# P95000043624

FILED  
Oct 22, 2014  
Secretary of State

Entity Name: TROPICAL LANDSCAPERS, INC.

**Current Principal Place of Business:**

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

**New Principal Place of Business:**

**Current Mailing Address:**

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

**New Mailing Address:**

FEI Number: 65-0591065

FEI Number Applied For ( )

FEI Number Not Applicable ( )

Certificate of Status Desired (X)

**Name and Address of Current Registered Agent:**

**Name and Address of New Registered Agent:**

KLEINRICHERT, JASON  
11187 90TH STREET SOUTH  
BOYNTON BEACH, FL 33472 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: JASON KLEINRICHERT

Electronic Signature of Registered Agent

Date

**OFFICERS AND DIRECTORS:**

Title: PD  
Name: KLEINRICHERT, JASON  
Address: 11187 90TH STREET SOUTH  
City-St-Zip: BOYNTON BEACH, FL 33472

Title: VPS  
Name: KLEINRICHERT, CATHERINE  
Address: 11187 90TH STREET SOUTH  
City-St-Zip: BOYNTON BEACH, FL 33472

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: CATHERINE KLEINRICHERT

VP

10/22/2014

Electronic Signature of Signing Officer or Director

Date

PALM BEACH COUNTY COMMISSION ON ETHICS  
**REPORT OF INVESTIGATION**

To: Mark E. Bannon, Executive Director  
From: Anthony C. Bennett, Chief Investigator  
Re: C15-029 – Gordon Eaton, Parks and Recreation, City of Delray Beach

The information provided in the Memorandum of Inquiry including all documentary and other evidence from the initial Inquiry completed in case number AN 15-024 is incorporated by reference into this Report of Investigation.

- **Investigation**

I began this investigation by obtaining additional background information on Gordon Eaton (Respondent), who is an employee with the City of Delray Beach (City) in the Parks and Recreation Department. Respondent has been a City employee since March 19, 2007. He is not listed in any supervisory role within the department nor does he have any authority to make purchasing or approval decisions.

On Monday, December 21, 2015, Respondent sent an email to the Commission on Ethics (COE) office stating that he was concerned he had been the victim of a possible identity theft. His email came in response to the email notification that after a preliminary inquiry, COE staff found there was reasonable and trustworthy information to believe he may have violated the Code of Ethics and filed a self initiated Complaint against him. In the email, Respondent stated he has "Never worked for Tropical Landscapers" or any other company since he began work for the City in 2007.

Respondent also questioned whether the address for Tropical Landscapers matched his home address, which he listed in the email. He then advised that he filed a Police Report with the Palm Beach Gardens Police Department (PBGPD) alleging that he had been a victim of identity fraud under Case# 15-329477. I scheduled a meeting with Respondent to provide a sworn statement and requested a copy of the police report.

- **Interview: Gordon Eaton (Respondent), Delray Beach:**

**On Tuesday, February 16, 2016, at 4:09 pm, I conducted a sworn audio recorded interview with Mr. Gordon "Flash" Eaton, Parks and Recreation Employee, Delray Beach, at the COE Conference Room – 300 North Dixie Highway Suite 447, West Palm Beach, FL 33401. Below are the details of that interview:**

Respondent stated he works for the City in the Parks and Recreation Department (Parks & Rec.) as a Maintenance Worker. He stated he has held this position for approximately nine (9) years, and his normal working hours are 6:30 am to 3:00 pm, Monday through Friday. He said he reports to Tim Simmons, Superintendent for Parks & Rec. and is an hourly employee, meaning he gets paid based on the actual number of worked hours.

Respondent stated during the course of his daily duties, he utilizes various lawn maintenance equipment to include mowers, weed eaters, edgers, blowers, ect. He stated he works only in the City parks conducting lawn and brush maintenance and nowhere else. He stated he occasionally supervises one or two people who are also City employees and that some are newer employees while others have worked for the City for a long time.

When I asked Respondent if he worked another job in conjunction with his current City job, he said "No, I have never had another job while working for the City of Delray." Respondent was asked if he ever completed an Outside Employment Form and submitted it to Human Resources and the COE, and he said "No".

When Respondent was asked if he was familiar with the company Tropical Landscapers, Inc., he stated he was aware of the company, and said the first time he learned of the company was through an investigation that was

conducted by the City. He advised "they" (investigators) were asking questions of him pertaining to that company. He stated he told them he did not know the company or the people who owned the company.

I showed Respondent the Articles of Incorporation for Tropical Landscapers, Inc. from the Florida Department of State, Division of Corporations, website ([www.sunbiz.com](http://www.sunbiz.com)) and ask him if he was familiar with it. Respondent read the names and addresses on the document as, Registered Agent: Jason Kleinrichert, Title President and Director: Jason Kleinrichert, Title Vice President and Secretary: Catherine Kleinrichert, and Principle Address: 8917 116<sup>th</sup> Terrace South, Boynton Beach, FL 33472. He advised he has never seen the document and was not familiar with any of the persons listed as President, Director, Registered Agent, Vice President or Secretary. He also advised he was not familiar with the address listed as the Principle Address for the company. In addition, he stated he has never been to the address listed.

Respondent stated he told the City investigators that he did not work for, never has worked for, and did not own the Company Tropical Landscapers, Inc. He thought once this was explained the issue surrounding the City thinking he worked for the company would have gone away. A few months later, he stated he received a note at his work complex to call a number. When he called the number, he was told by the Palm Beach County Commission on Ethics that he was under investigation. He advised he was not sure why he was being investigated because he explained himself to his supervisors with the City and thought this issue had been resolved.

Respondent stated after he got the call that the COE was looking into this issue, he went to the PBGPD to try and file a report about a possible identity theft. He stated he did that because he was absolutely sure that he had nothing to do with Tropical Landscapers, and that someone had to have been using his name and information to work for this company. Respondent and his spouse, Shelly Ann Eaton, contacted the police department for help. He stated PBGPD took their information and statement, and gave them case number 15-329477 as reference for the report. The statement was similar to the statement Respondent gave during the interview.

Respondent advised the police had looked into his issue, but told him they could not get in touch with anyone at Tropical Landscapers, Inc. Respondent stated he would provide a copy of the filed police report and the name of the Investigator looking into the complaint. Respondent stated in addition to filing a police report, he took steps to contact Tropical Landscapers as well. He said when he called the number (561-369-2899), it was out of service.

Respondent was shown a spreadsheet which was provided by Complainant that listed the City vendor as Tropical Landscapers, Inc. with an employee name of Gordon Eaton. The document also listed Hire Date: March 19, 2007; Department: Parks and Rec.; and Type: Plant. He stated the hire date and department listed was his hire date and department, but **again** he was not an employee of Tropical Landscapers, Inc.

Respondent was given another document to review which he identified as a Purchase Order (PO). He read the PO number as 667139, Vendor number as 22580, Amount as \$375, and Check Date as 6/4/2010. He stated he did not receive a check on 6/4/2010 in the amount of \$375 from the City or from Tropical Landscapers.

Respondent was provided with another document to review which he identified as PO number 684107 with Vendor number 22580 for \$800 dated 8/3/2012. He stated he did not receive a check on 8/3/2012 in the amount of \$800 from the City or from Tropical Landscapers.

Respondent was given another document to review which he identified as PO number 698313 with Vendor number 22580 for \$189 dated 5/16/2014. He stated he did not receive a check on 5/16/2014 in the amount of \$189 from the City or from Tropical Landscapers.

I advised Respondent the total amount for all three POs was \$1,364. Respondent advised he did not receive a check from the City or from Tropical Landscapers for that amount "outside his normal work schedule for the City". He reiterated he has never seen those numbers or amounts before.

Respondent stated when he works his normal City job he is paid by direct deposit into his bank account. He advised he has gotten paid in the same manner for the entire nine (9) years he has worked for the City. He stated he does not get cash or checks from the City, supervisors, or any representative of the City. He also stated he has never worked for any vendor of the City, nor has he ever received any money or checks from a vendor of the City. He also stated he does not have another job outside of his regular current City job. Respondent advised he believes he is a victim of identity theft, but he has not told his supervisors that he filed a police report.

**The interview was concluded at 4:25 pm.**

On February 16, 2016, Respondent forwarded a scanned copy of the Palm Beach Gardens Police Report and the name of the assigned officer via email. The report was filed on December 21, 2015 at 1:50 pm by Shelly Ann Eaton. The information provided in the report and given to the police department is consistent with the statement given by Respondent. In addition to the report, a copy of a business card for PBG Police Officer F. O'Brien and a copy of Respondent's Florida Drivers License was included. I compared Respondent's address to the address listed for Tropical Landscapers, Inc. and they did not match. This information has been added to the file.

To gather further information on the process that began this Complaint, I contact Mr. Donald Cooper, City Manager of Delray Beach, who is listed as Complainant. Mr. Cooper agreed to provide a taped statement to assist with this investigation.

- **Interview: Donald Cooper, City Manager, Delray Beach:**

**On Wednesday, February 24, 2016, at 3:08 pm, I conducted a sworn audio recorded interview with Mr. Donald Cooper, City Manager of Delray Beach at Delray Beach City Hall – 100 NW 1<sup>st</sup> Avenue, Delray Beach, FL 33444. Below are the details of that interview:**

Mr. Cooper was sworn in and advised that his statement was being recorded. He acknowledged and agreed to being recorded. He advised that he is the current City Manager for the City hired on January 5, 2015. He stated he supervises approximately 850 city employees in various departments, to include the Purchasing Department.

Mr. Cooper said when he became City Manager there was one individual in charge of Purchasing, which was part of the Finance Department. As of date of this interview, he has moved Purchasing out of the Finance Department and made it into a standalone department that consists of seven (7) employees. He advised the change was made due to some procurement issues that were discovered early during his tenure with the City. He stated the Purchasing Department currently has an Interim Chief Purchasing Officer named, Mr. Steven Chapman, who reports directly to him. Prior to Mr. Chapman, Ms. Holly Vath held the position for ten (10) months. Prior to Ms. Vath, a woman named Ms. Nadal held the position for a long period of time. During Ms. Nadal's tenure, Purchasing was still structured within the Finance Department. Mr. Cooper reiterated that both Ms. Nadal and Ms. Vath were no longer City employees.

Mr. Cooper advised he was familiar with the City's procurement process, which is outlined within Chapter 36 of the City's Municipal Code (A copy of the section of the City's Code has been added to the file). Mr. Cooper explained when a vendor or possible vendor wants to do business with the City the process is divided into various dollar amounts, which are as follows: Purchases valued at under \$2,500 can be approved at the department level; Purchases between \$2,501 and \$10,000 must be approved by the department supervisor, purchasing officer, and three (3) quotes for service; Purchase of any goods or services valued at between \$10,001 and \$25,000 must be approved by the City Manager; and Any purchase over \$25,001 must be approved by the City Commission.

Mr. Cooper stated he conducted an audit of the City's procurement process based on a comment in a report completed by the Palm Beach Office of the Inspector General (OIG) noting some discrepancies within the City's Environmental Services Department (ESD), which involved the purchasing of signs, sign posts, sign poles and other related materials. He stated it was essentially, "People doing business with themselves." As a result of that one discrepancy, he ordered an external audit of all City purchasing processes to determine if there were others.

Mr. Cooper advised the audit found that a number of City employees had current contracts, or had been under contract, to provide goods or services for the City. These employees had not disclosed, or did not appear to have disclosed, their employment relationship with the City while fulfilling the contracts. He went on to say that he immediately turned the information over to the Commission on Ethics to request a formal investigation. Mr. Cooper affirmed the audit was conducted "in-house" pursuant to his direction and began roughly February or March of 2015 and ended in April of 2015.

Mr. Cooper stated a number of issues were discovered, which included possible violations of City rules and administrative procedures. Also, there were possible violations of criminal law, which were referred to the State Attorney's Office (SAO). In addition, there were also possible violations of the Palm Beach County Code of Ethics. In essence, he stated there were multiple parties with multiple violations that may have been relevant to multiple agencies, and he forwarded all of the information to each of the agencies.

Mr. Cooper stated the City also conducted their own investigation to discover if Administrative or City policies had been violated. He stated all of the employees outlined in the audit were notified of the investigation, to include the possibility of some form of discipline if the allegation(s) had proven true. He stated this notification process is guided by City rules and current union contracts.

Mr. Cooper stated he was sure that all of the employees that were highlighted by the audit had taken the Ethics training and signed an Acknowledgement Form. He stated that confirmation of training was part of audit process used to determine if a violation had occurred. Employee names were matched against signed Acknowledgement Forms as verification. Mr. Cooper said he took the same Ethics training taken by the identified employees. He referenced a statement within the training which outlined, "Employees could not enter into contracts with the City that employs them." He said he is familiar with the statement and advised he signed the same Acknowledgement Form that the employees signed, so he was confident they were trained on that section. Mr. Cooper advised that the audit revealed that some of the contracts were only one-time contracts. There were also some contracts where multiple goods or services were purchased from the same vendor or vendors on various occasions.

At 3:26 pm, Mr. Cooper was asked if he was familiar with a City employee named Gordon Eaton (Respondent), and stated he was not sure if he knew him personally. I showed Mr. Cooper a copy of the Delray Beach audit report which listed several names and monetary amounts, which included the name of the Respondent. Mr. Cooper advised the page was consistent with the formal Audit Report completed by the City. He read Respondent's name on the document as Gordon Eaton, the Department as Parks and Recreation, and the monetary amount of \$1,364 dollars.

When asked if Respondent submitted an Outside Work Form with City, Mr. Cooper stated he did not directly recall; however, based on the investigation, the COE would not have received notice of a possible violation if Respondent had submitted one. During the review process prior to contract procurement, it would have been realized that Respondent was an employee, thus it would not have been approved, or should not have been approved.

Mr. Cooper was asked if he was aware Respondent filed a stolen identity police report with PBGPD. He stated that he was not aware of that filing, and advised Respondent never came to him to make him aware of the identity situation. When Mr. Cooper was shown a copy of the PBGPD report and read the statement which referenced Respondent's account of the stolen identity issue, he also noted the report was filed by Ms. Shelly Eaton (later identified as the Respondent's wife). Within the statement Mr. Cooper read that Mr. Eaton does not work for nor has he ever worked for Tropical Landscaper's. He advised that an Investigator was sent to make contact with all individuals referenced, but had no knowledge on this particular instance of identity fraud or verification of the Tropical Landscaper's issue.

Mr. Cooper stated the majority of the contracts paid by Finance to this individual were by check. He advised he never saw the checks or who endorsed them. He stated a requisition is made by the individual department. From there the requisition goes to the Finance Department where it is billed and approved. Finance then cuts the check to the entity or contact person for the entity.



In review, Mr. Cooper reiterated this practice of employees contracting with the City had been going on for approximately ten (10) years and included various employees in different departments within the City. He advised when an employee is hired, in addition to the Ethics Training, they also receive additional City Introduction Training by the Human Resources Department. Since he has come on board, he has placed more emphasis on contractual issues with the City during the training in an attempt to ensure no more violations occur. The information is also available in an employee handbook.

Mr. Cooper stated this has been an ongoing problem in the City for some time, which includes a lack of awareness of County and State laws, and City ordinances and procedures by senior management relevant to this issue. He advised there was an improper reliance on past practices where this type of behavior was allowed. In many instances, the approver only consisted of one person who showed they were not informed of proper procedures, and tried to give the employee what they wanted.

**The interview was concluded at 3:33 pm.**

On February 25, 2016, I went to the principal address listed for Tropical Landscapers, Inc., on the Florida Department of State Division of Corporations website. I made contact with Mr. Jason Kleinrichert at the business, and he identified himself as the owner of Tropical Landscapers, Inc. Mr. Kleinrichert stated he did not believe his company was a vendor for the City of Delray Beach. He advised he knew he was a vendor of other cities within Palm Beach County, but could not recall Delray Beach as being one of them.

Mr. Kleinrichert advised Tropical Landscapers, Inc. is a plant and tree nursery. They supply plants, flowers and trees to a variety of cities, private companies, housing developments, and private home owners. He stated some of the items are supplied via contract, while others come in and pay cash for a one-time item(s). He stated his company has been in existence since 1995, but they've only been in their current location in Boynton Beach since 2009.

When I showed Mr. Kleinrichert the Articles of Incorporation document for Tropical Landscapers, Inc. from the sunbiz website, he stated the documents were valid and that he and his wife, Catherine Kleinrichert, had filed them. Mr. Kleinrichert stated he did not know Respondent, and that Respondent was not one of his employees and definitely not one of the owners. He again reiterated the Company is owned solely him and his wife, Catherine.

Then I showed Mr. Kleinrichert a copy of Respondent's Florida Driver's License, which was provided by Respondent along with the police report documentation, and he reiterated that he had not ever seen Respondent nor was Respondent affiliated with his company. Mr. Klienrichert was also shown copies of the Purchase Orders paid by the City to Tropical Landscapers. He advised he did not remember seeing any monies come in from the City, but he would ask his wife as she handles the books. Mr. Kleinrichert had no other relevant information.

On Wednesday, March 30, 2016 I contacted Executive Assistant Ms. Lauren Czencz, Delray Beach Finance Department, via email to request copies of any contracts or agreements for services between the City and Tropical Landscapers, Inc. and/or Respondent. I also requested copies of all checks and invoices between the parties. On April 18, 2016 I received copies of the requested documents via FedEx.

The forwarded documentation included the following:

1. Purchase Order 684107 between Tropical Landscapers, Inc and the City for services rendered in the amount of \$800.
2. Receipt for payment of \$800 for 400 Spider Lily plants (Time and Date stamped 7/25/12 by the City).
3. Confirmation of payment receipt of \$800 paid to Tropical Landscapers, Inc. by the City dated 7/13/12 and signed by Mr. David Boyd.
4. Purchase Requisition for plants made by City Parks and Recreation Representative J. Friedman to Vendor Tropical Landscapers, Inc. (Vendor #22580).

5. Processed City of Delray Beach Check (#477463), dated 8/3/12, for the amount of \$800 paid to Tropical Landscapers, Inc.
6. Purchase Order 698313 between Tropical Landscapers, Inc and the City for services rendered in the amount of \$189, dated 5/1/2014.
7. Tropical Landscapers, Inc. Invoice (#2014343) for 7 Neo Chantini 8" and 7 Neo Chantini (7 Gal.) billed to the City for the amount of \$189.
8. Confirmation of payment receipt of \$189 paid to Tropical Landscapers, Inc. by the City dated 5/1/14 and signed by Ms. Milena Walinski.
9. Receipt for payment of \$189 for 7 Neo Chantini 8" and 7 Neo Chantini (7 Gal.) plants (Time and Date stamped 5/8/14 by the City.
10. Processed City of Delray Beach Check (#497888), dated 5/16/14, for the amount of \$189 paid to Tropical Landscapers, Inc.
11. Processed City of Delray Beach Check (#450745), dated 6/4/10, for the amount of \$375 paid to Tropical Landscapers, Inc.

All of documents have been added to the file.

In reviewing three cashed checks that were forwarded and all other documentation sent, I noted the name on the checks was that of the business Tropical Landscapers, Inc. Respondent's name was not listed on any of the checks or anywhere in the other documentation. I noticed all checks were cashed at National City Bank. I searched online for the National City Bank location. I discovered National City Bank was sold a few times over the past few years resulting in several name changes. The current name of the bank is PNC Bank.

On Tuesday, April 19, 2016, I went back to Tropical Landscapers, Inc. attempting to speak with the owner, Mr. Kleinrichert about the cashed checks. Although Mr. Kleinrichert was not available, Mrs. Catherine Kleinrichert, Vice President and Secretary for Tropical Landscapers, Inc., was available and provided information. Ms. Kleinrichert reviewed the checks and requested a copy of one to compare with her records. She stated she remembered possibly having a contract relationship with the City of Delray Beach but was not 100% sure. She said her duties involved the financial side of the business and that her husband, Mr. Kleinrichert, really did not work with that part. She stated her husband probably would not know who comes in to pay for orders unless there is a problem with the payment. Mrs. Klienrichert made a copy of check #477463 (\$800).

On Tuesday, April 19, 2016, I went to a PNC Bank branch located at 3989 Forest Hill Boulevard, West Palm Beach, FL 33406 and made contact with Ms. Gizelle Reyes, VP Branch Manager. Ms. Reyes confirmed PNC Bank was once National City Bank then purchased and renamed to Fidelity Bank, ultimately being purchased again becoming PNC Bank.

Ms. Reyes reviewed the City Check #477463 and confirmed it had been cashed by the bank. However, due to the time frame she could not verify who cashed the check. Based on her knowledge of the banking process, the only persons that could cash the check and receive money would have to be on the authorized account. They would also have to be an authorized account signer. Ms. Reyes also stated that in order to open a business account, you would need Article of Incorporation documents which would have to be filed with a state.

Ms. Reyes advised this particular account was closed, but noted based on the deposit stamp this check could only be deposited not cashed to receive money directly. The deposit stamp read, "PAY TO THE ORDER OF NATIONAL CITY BANK LAKE WORTH, FL 33467-5203 (267084199) FOR DEPOSIT ONLY TROPICAL LANDSCAPERS INC. 0001549618." In this case only the authorized account holders would have access to the monies. When asked owned the account, she advised she could not provide the information without a subpoena. She did, however, say as listed on the back of the check, persons involved with this company (Tropical Landscapers, Inc.) would most likely be the ones that could access it.

On Thursday, April 21, 2016, I received an email from Catherine Kleinrichert, Tropical Landscapers, Inc. as follows:

*"Dear Mr. Bennett,*

*I did some research after you paid a visit to my office and found the following invoices for material that was picked up at our nursery back in 2010 and 2012. Both orders have a PO number at the top and were picked up in person at our nursery.*

*Thank you,*

*Cathy Kleinrichert*

*Office (561) 369-2899"*

Also included in the email was an attachment containing Invoice #2010398 and dated 5/5/2010. The Invoice listed a purchase order (156898) for 100 Crown of Thorn (3. Gal) plants. The invoice was created by Tropical Landscapers, Inc., and billed to the City for the amount of \$375. It should be noted that I did not give Mrs. Kleinrichert a copy of this Invoice, nor did I give her a copy of the \$375 check that was used for payment. These documents coincide with the documents forwarded to me by City Executive Assistant Lauren Czenz. A copy of this email and the documentation has been added into the file documents.

A phone call was made to Tropical Landscapers, Inc. to verify they used PNC Bank (National City Bank) as a bank for their corporate account. Mr. Kleinrichert stated they currently use Wells Fargo Bank as their banking institution, but they have used PNC Bank in the past, and that account is currently closed.

- **Summary of the allegations in the Complaint**

Complainant alleges that Respondent, an employee of the City since 2007 in the Parks & Rec. Department, may have acted in violation of §2-443(d), *Contractual relationships*, by being an employee of the City and working for Tropical Landscapers, Inc. as an independent contractor or employee. This information was discovered when the City tasked external auditors to comparing City employee contact information to City vendor contract information to determine if there were possible employee conflicts.

The audit found City employee Gordon Eaton (Respondent) as being employed by Tropical Landscapers, Inc., a company determined to be a vendor of the City from 2010 through 2014, and that the company received total amount of \$1,364 during that time.

- **Additional documents submitted to the File**

1. Email from Respondent to COE. (2 pages)
2. COE Sworn Interview Form – 2/16/2016. (2 pages)
3. Palm Beach Gardens Police Department Report – Case #15329477. (1 page)
4. Palm Beach Gardens Police Department Business Card – Officer F. O'Brien. (1 page)
5. Respondent Florida Driver's License (Personal Information Sanitized). (1 page)
6. COE Sworn Interview Form – 2/24/2016. (2 pages)
7. Emails – Ms. L Czencz, Executive Assistant Finance Department. (2 pages)
8. Email Exchanges – COE and City of Delray Beach. (4 pages)
9. Requested Invoices, Receipts and Checks paid to Vendors. (16 pages)
10. PNC Bank: VP Branch Manager Reyes Contact Information. (1 page)
11. Email from Mrs. Catherine Kleinrichert (Invoice Copy Attached). (2 pages)

- **Summary of Investigation findings**

Based on the information provided by Complainant and information uncovered during the Investigation, the facts do not support a violation of section 2-443(d), *Contractual relationships* by Respondent.

Although Respondent is an employee of the City, it was confirmed that he is not now nor has ever been an employee, owner, or part owner of Tropical Landscapers, Inc. Both Mr. and Mrs. Kleinrichert were confirmed to be the sole owners of the company based on their statements and the Articles of Incorporation filed with the Florida Department of State.

Further, Respondent was not listed on any invoices, purchase orders or checks issued by the City and received by Tropical Landscapers, Inc. Respondent did not have access to any of the National City Bank accounts owned by Tropical Landscapers, Inc. as verified by both Mr. and Mrs. Kleinrichert and PNC Bank (National City Bank) VP Branch Manager Gizelle Reyes.

Therefore, there are no reasonably trustworthy facts and circumstances to conclude that the Respondent, Gordon Eaton, violated §2-443(d), Contractual relationships, of the Palm Beach County Code of Ethics by Respondent in this instance.

End of Investigation

Submitted by:



Anthony C. Bennett  
PB County Commission on Ethics

5/24/16  
Date

Reviewed by:



(Initials)

5/24/2016  
Date

PALM BEACH COUNTY COMMISSION ON ETHICS  
**PROBABLE CAUSE RECOMMENDATION**

To: Commission on Ethics  
From: Christie E. Kelley, Advocate  
Re: C15-029 –Gordon Eaton, Parks and Recreation, City of Delray Beach

All background information and facts from the Memorandum of Inquiry, Report of Investigation, and supporting documents are adopted by reference into this Probable Cause Recommendation.

- **Recommendation**

A finding of NO PROBABLE CAUSE should be entered in the above captioned matter as to the alleged violation of Sec. 2-443(d).

*Probable Cause exists where there are reasonably trustworthy facts and circumstances for the Commission on Ethics (COE) to conclude that the Respondent, Gordon Eaton, violated the Palm Beach County Code of Ethics.*

- **Jurisdiction**

The COE has jurisdiction pursuant to Chapter 2, Article V, Division 8, section 2-258(a) of the Palm Beach County Commission on Ethics Ordinance which states in pertinent part:

Article V, Division 8, Section 2-258. *Powers and duties.* (a) The commission on ethics shall be authorized to exercise such powers and shall be required to perform such duties as are hereinafter provided. The commission on ethics shall be empowered to review, interpret, render advisory opinions, and enforce the:

- (1) Countywide Code of Ethics;
- (2) County Post-Employment Ordinance, and
- (3) County Lobbyist Registration Ordinance.

- **Analysis**

The investigation revealed that there is insufficient evidence to prove Respondent violated §2-443(d) of the Palm Beach County Code of Ethics (Code).

Here, to prove that Respondent violated §2-443(d), *Contractual relationships*, the evidence must show that Respondent or his outside business or employer was a vendor of the City of Delray Beach (City). Based on the information revealed during the investigation, there is no evidence to support the allegation that Respondent was employed by Tropical Landscapers, Inc., a vendor of the City.

When Chief Investigator Anthony Bennett spoke to Respondent, he denied ever receiving any monies from the City, besides his normal paycheck, for services rendered through a second job. Respondent stated that he has never had a second job while employed by the City and that he was not employed by or affiliated with Tropical Landscapers, Inc. in any way. He stated he did not know why his name was listed on a City audit form showing he received a total of \$1,264 from the City. After learning that his name was on the audit form, Respondent filed a police report with the Palm Beach Gardens Police Department claiming he had been the victim of identity theft. Respondent provided copies of the police report.

In addition, the Florida Department of State Division of Corporations website lists Mr. Jason Kleinrichert and Mrs. Catherine Kleinrichert as the owner, vice president, registered agent and secretary of Tropical Landscapers, Inc. Respondent's name was not listed anywhere on the Articles of Incorporation documents. Mr. and Mrs. Kleinrichert verified this information when Chief Investigator Bennett spoke with them. In addition, when Mr. Kleinrichert was shown a copy of Respondent's Florida driver's license, he stated he did not know Respondent,



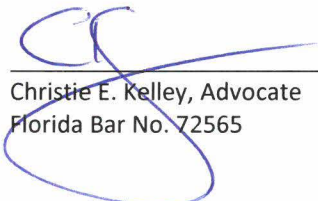
Respondent was not one of his employees, and Respondent was not affiliated with Mr. Kleinrichert's company in any way. Mrs. Kleinrichert also confirmed that Tropical Landscapers, Inc., had a past contractual relationship with the City of Delray Beach for plants, which were paid for and picked up by the City.

Further, the investigation revealed that Respondent was not listed on any invoices, purchase orders, or checks issued by the City of Delray Beach and received by Tropical Landscapers, Inc. The checks from the City were not made payable to Respondent; they were made payable to Tropical Landscapers, Inc. and were deposited at National City Bank. Mr. Kleinrichert stated that Tropical Landscapers, Inc. previously had a business account with National City Bank. When Chief Investigator Bennett spoke with PNC Bank Vice President Branch Manager Gizelle Reyes, she confirmed that the checks from the City were deposited at a National City Bank branch, which was now operating as PNC Bank. Without a subpoena, Ms. Reyes would not verify whether the account was in the name of Tropical Landscapers, Inc. or Mr. and Mrs. Kleinrichert. However, she stated that based on the deposit stamp, which listed the phrase "For Deposit Only Tropical Landscapers, Inc." the check could only be deposited and accessed by an authorized signer. Ms. Reyes stated that in order to open a business account, the Articles of Incorporation needed to be provided. Based on the Article of Incorporation documents, the Kleinricherts were the only persons authorized to conduct business under the corporate name of Tropical Landscapers, Inc.; Respondent could not have access to any of the National City Bank accounts owned by Tropical Landscapers, Inc.

### Conclusion

Based on the facts and circumstances, there is **NO PROBABLE CAUSE** to believe that Respondent violated §2-443(d), *Contractual relationships*, of the Palm Beach County Code of Ethics. Therefore, I recommend that a finding of **NO PROBABLE CAUSE** and an **ORDER of DISMISSAL** be entered.

By:

  
Christie E. Kelley, Advocate  
Florida Bar No. 72565

5-25-16  
Date



## **Anthony Bennett**

---

**From:** Gordon Eaton [gfeaton73@yahoo.com]  
**Sent:** Monday, December 21, 2015 7:18 PM  
**To:** Gina A. Levesque  
**Cc:** Anthony Bennett  
**Subject:** Re: Ethics Complaint C15-029

Good Day,

I reviewed the information provided to me and I am very concerned. In fact, when I was questioned previously at work about this matter, I asked if I should be alarmed that I may be a victim of identity theft. .

Today, my wife went to the Palm Beach Gardens Police Department and filed a report on my behalf regarding this matter. I have never worked for Tropical Landscapers or any other company part time or temporary since I have worked with the City of Delray Beach. I need to know what information is needed. In addition, the officer at PBGPD stated that if there is proof that someone used my information, I should request a copy.

My start date with the City of Delray Beach was 3/19/2007. My previous home addresses since then are 4965 NW 6th Street, Delray Beach, FL 33445 and 4116 Napoli Lake Drive, Riviera Beach FL 33410. My name is Gordon Flash Eaton. DOB 2/7/73, last 4 SSN 0476. Does the information from the company match these information. If so, I believe I am entitled to a copy to give to the Palm Beach Gardens Police Department. I am also alerting the credit bureaus, Social Security and IRS.

I Gordon Flash Eaton have never worked for any other company since employed by the City of Delray Beach. I have never worked for Tropical Landscapers before my employment with the city. I am so disappointed and I am hoping that this is resolved soon.

I look forward to hearing from the advocate that will be assigned to me, so this can be put behind me.

PBGPD case # 15-329477

Regards,

Gordon Flash Eaton

On Monday, December 21, 2015 11:13 AM, Gina A. Levesque <[Glevesque@palmbeachcountyethics.com](mailto:Glevesque@palmbeachcountyethics.com)> wrote:

Good morning Mr. Eaton,

I apologize for the error. I attached the wrong item. Attached is the full set of documents you were supposed to receive. Please let me know if you have any additional questions.

Thank you,

**Gina A. Levesque, Intake Manager**  
**Palm Beach County Commission on Ethics**

Ph 561-355-1937

[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)

---

**From:** Gina A. Levesque  
**Sent:** Friday, December 18, 2015 3:21 PM  
**To:** 'gfeaton73@yahoo.com'  
**Cc:** Anthony Bennett  
**Subject:** Ethics Complaint C15-029

Good afternoon Mr. Eaton,

Once you have read the attached, please contact me with any questions.

Thank you,

**Gina A. Levesque, Intake Manager  
Palm Beach County Commission on Ethics  
The Historic 1916 Palm Beach County Courthouse  
300 North Dixie Highway, Suite 450  
West Palm Beach, FL 33401  
Ph 561-355-1937  
Fx 561-656-7100**

<mailto:scullen@palmbeachcountyethics.com>  
[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)

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Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

## COE Sworn Interview Form

This is Anthony Bennett, Investigator with the Palm Beach County Commission on Ethics

This will be an interview with Mr. Gordon Eaton

Conducted in reference to COE case # C15-029

Today's date is Tuesday, Feb 16, 2016

The time by my watch is 4:09 pm

The location of this interview is: 300 North Dixie Hwy Suite 447  
West Palm Beach, FL 33401  
COE Conference Room.

**Please state:** Your Full Name  
Your Occupation/ Title, and the Public Entity you serve  
Your Work Address  
Your Work Phone Number  
An Email Address that you wish to use for COE contact

---

### Oath

Please raise your right hand:

***Do you swear or affirm that during this interview you will tell the truth, the whole truth and nothing but the truth?***

- 
- ☒ Do you understand that you are under oath?
  - ☒ Do you agree that this interview is being conducted voluntarily, and that no threats or promises have been made to compel you to talk with me today?
  - ☒ Do you understand that this conversation is being audio recorded?

*AS*

## **Anthony Bennett**

---

**Subject:** Interview C15-029  
**Location:** 300 North Dixie Highway Suite 447, West Palm Beach, FL 33401 - COE Conference Room  
**Start:** Tue 2/16/2016 4:00 PM  
**End:** Tue 2/16/2016 5:00 PM  
**Recurrence:** (none)  
**Organizer:** Anthony Bennett

### **Respondent Interview**

February 16, 2016, at 4:09 pm,  
COE Conference Room – 300 North Dixie Highway Suite 447, West Palm Beach, FL 33401



**PALM BEACH GARDENS POLICE DEPARTMENT**

**10500 N. MILITARY TRAIL  
PALM BEACH GARDENS, FL 33410**

**STATEMENT**  
*suspicious incident*

CASE #: 15-329477  
DATE: 10/21/15  
TIME: 1:30

NAME: Shelly-Ann Eaton DOB: 5/4/78  
ADDRESS: 4419 Golfers Cir W. CITY: PBG STATE: FL ZIP: 33410  
HOME# \_\_\_\_\_ WORK # \_\_\_\_\_ CELL # 561-524-1531

I, Shelly-Ann Eaton, having been advised of my constitutional rights and understanding that I do not have to make any statement, do hereby voluntarily make the following statement to Off. O'Brien who has been identified to me as a Police Officer, I understand that this statement, or any portion thereof, may be used against me, or any other person at any time, in any court, trial or issue. I further state that I have been subjected to no threats or duress, and have received no promise of reward or immunity.

I would like to file a report about possible identity theft for my husband Gordon Eaton. He received a complaint from P.B. County of an ethics violation stating he worked for a vendor Tropical Landscapers. However my husband have never worked for this company we received a letter stating that they have received information that Gordon Flash Eaton was employed this company.

for city delay (crew leader-picks)

I do hereby certify that I have read the proceeding statement and that it is true and correct, to the best of my knowledge and belief.

State of Florida  
County of Palm Beach  
Sworn to (or affirmed) and subscribed before me  
this 21 day of Dec, 20 15

[Signature]  
NOTARY PUBLIC/POLICE OFFICER

SIGNED: [Signature]



CITY OF PALM BEACH GARDENS  
POLICE DEPARTMENT

**FRANCINE O'BRIEN**

OFFICER ID # 435

Case # 15-389477

10500 N. MILITARY TRAIL  
PALM BEACH GARDENS, FL 33410

MAIN: (561) 799-4445  
FAX: (561) 799-4589  
MAILBOX: (561) 804-7264  
EMAIL: [fobrien@pbgfl.com](mailto:fobrien@pbgfl.com)

I called 561-804-7264  
for Tropical Land use





A Florida Driver License card for Gordon Eaton. The card features a photo of a man with a beard and a mustache. The text on the card includes the name 'GORDON EATON', a date of birth 'DOB: [REDACTED]', and an expiration date 'EXPIRES: [REDACTED]'. The card also has a 'SAFE DRIVER' label and a 'CLASS E' designation. The background of the card is a mix of blue and orange.

**Florida** Sunshine State  
**DRIVER LICENSE CLASS E**

GORDON  
EATON

DOB: [REDACTED]  
ISSUED: [REDACTED]  
EXPIRES: [REDACTED]  
ENDORSE: [REDACTED]  
REPLACED: [REDACTED]

SAFE DRIVER

Operation of a motor vehicle constitutes consent to any sobriety test required by law.

## COE Sworn Interview Form

This is Anthony Bennett, Investigator with the Palm Beach County Commission on Ethics

This will be an interview with Mr Donald Cooper

Conducted in reference to COE case # C15-026/C15-027/C15-028/C15-029

Today's date is February 24, 2016 <sup>C15-030</sup>

The time by my watch is 3:08 pm

The location of this interview is: Delray Beach City Hall

100 NW 1<sup>st</sup> Ave Delray Beach, FL  
33444

**Please state:**

- ☒ Your Full Name
- ☒ Your Occupation/ Title, and the Public Entity you serve
- ☒ Your Work Address
- ☒ Your Work Phone Number
- ☒ An Email Address that you wish to use for COE contact

---

### Oath

☒ Please raise your right hand:

***Do you swear or affirm that during this interview you will tell the truth,  
the whole truth and nothing but the truth?***

- 
- ☒ Do you understand that you are under oath?
  - ☒ Do you agree that this interview is being conducted voluntarily, and that no threats or promises have been made to compel you to talk with me today?
  - ☒ Do you understand that this conversation is being audio recorded?

## Anthony Bennett

---

**Subject:** Interview  
**Location:** Delray Beach City Hall  
  
**Start:** Wed 2/24/2016 2:30 PM  
**End:** Wed 2/24/2016 4:00 PM  
  
**Recurrence:** (none)  
  
**Organizer:** Anthony Bennett

Donald Cooper - Delray Beach City Hall – 3 pm

## Anthony Bennett

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**From:** Czencz, Lauren [czencz@mydelraybeach.com]  
**Sent:** Wednesday, March 30, 2016 3:47 PM  
**To:** Anthony Bennett  
**Subject:** RE: Records Request from Commission on Ethics

Hi Anthony,

I am in receipt of your request and will forward the information once compiled.

Thank you!

*Lauren Czencz*

**Executive Assistant, Finance Department**  
**City of Delray Beach**  
**561-243-7121**  
**czencz@mydelraybeach.com**



PUBLIC RECORDS NOTE: Florida has a very broad public records law. Most written communications to or from local officials, employees, or the general public regarding city business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

---

**From:** Anthony Bennett [mailto:ABennett@pbcgov.org]  
**Sent:** Wednesday, March 30, 2016 3:31 PM  
**To:** Czencz, Lauren  
**Subject:** Records Request from Commission on Ethics

Good Afternoon Ms. Czencz,

I am currently investigating a few issues within your City. Based on statements given and information received from various sources, I am in need a few items that will assist me with this process. I have listed those items below...

1. Any contracts/agreements between the City of Delray Beach and the below listed persons/vendors/companies. If it was electronically submitted, please include the electronic signature(s) used if applicable/available.
2. Please provide copies of all checks and/or invoices that were made out to the below listed companies, listed individuals, or persons representing those companies. If you have a check number and date(s) of payment, that would be great as well. Also, if you have copies of "canceled" (signature affixed) checks, please provide those as well.

- ~~Delray Beach - Phoenix Business Cleaning, LLC~~
- ~~Delray Beach - Long Island Business Services~~
- ~~Delray Beach - American Traffic Products Corporation~~
- ~~Delray Beach - Delray Business Design & Graphics, LLC~~
- ~~Delray Beach - Business Training~~

- Gordon Eaton – Tropical Landscapers Inc.
- ~~Clayton Sprague – American Tree & Plant Services Inc.~~

I am not in a major hurry, so as soon as practical for you would be fine in getting me those items. The items could be scanned or mailed, which ever works better for you and your staff. Also, if you need clarification on anything, please contact me directly. I thank you in advance for your assistance...

*Anthony C. Bennett*

**Chief Investigator**

**Palm Beach County Commission on Ethics**

The Historic 1916 Palm Beach County Courthouse

300 North Dixie Highway, Suite 450

West Palm Beach, FL 33401

**Ph 561-355-1956**

**Fx 561-355-1904**

**[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)**



*"Honesty, Integrity, Character"*

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Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

## Anthony Bennett

---

**From:** Cooper, Donald [cooperd@mydelraybeach.com]  
**Sent:** Monday, April 11, 2016 4:59 PM  
**To:** Anthony Bennett  
**Subject:** RE: Records Request from Commission on Ethics

Welcome.

---

**From:** Anthony Bennett [mailto:ABennett@pbcgov.org]  
**Sent:** Monday, April 11, 2016 4:58 PM  
**To:** Cooper, Donald  
**Subject:** RE: Records Request from Commission on Ethics

Just got word Ms. Czencz that I will have the information by this Wednesday. Mr. Warner stepped in to make sure I got what was asked for. I appreciate your assistance.

*Anthony C. Bennett*

**Chief Investigator**

**Palm Beach County Commission on Ethics**

The Historic 1916 Palm Beach County Courthouse

300 North Dixie Highway, Suite 450

West Palm Beach, FL 33401

Ph 561-355-1956

Fx 561-355-1904

C 561-951-8139

[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)



*"Honesty, Integrity, Character"*

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**From:** Cooper, Donald [mailto:cooperd@mydelraybeach.com]  
**Sent:** Monday, April 11, 2016 4:57 PM  
**To:** Anthony Bennett  
**Subject:** RE: Records Request from Commission on Ethics

Did you get what was requested?

---

**From:** Anthony Bennett [mailto:ABennett@pbcgov.org]  
**Sent:** Friday, April 01, 2016 2:35 PM  
**To:** Cooper, Donald  
**Cc:** Mark Bannon E.; Christie Kelley E.  
**Subject:** FW: Records Request from Commission on Ethics



Good Afternoon Mr. Cooper,

Please read below. Any assistance with Mr. Snyder would be greatly appreciated.

Thank you Sir...

***Anthony C. Bennett***

**Chief Investigator**

**Palm Beach County Commission on Ethics**

The Historic 1916 Palm Beach County Courthouse

300 North Dixie Highway, Suite 450

West Palm Beach, FL 33401

**Ph 561-355-1956**

**Fx 561-355-1904**

**C 561-951-8139**

**[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)**



*"Honesty, Integrity, Character"*

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**From:** Snyder, Jeff [<mailto:SnyderJ@mydelraybeach.com>]

**Sent:** Friday, April 01, 2016 12:25 PM

**To:** Warner, Jack; Czencz, Lauren; Nubin, Chevelle; Wynn, Kimberly

**Cc:** Carlson, Barbara; Pfeffer, Noel; Anthony Bennett

**Subject:** RE: Records Request from Commission on Ethics

I am wondering if the ethics commission understands that we have already been gigged by the OIG for these issues and the root cause has been corrected?

---

**From:** Warner, Jack

**Sent:** Friday, April 01, 2016 9:45 AM

**To:** Czencz, Lauren; Nubin, Chevelle; Wynn, Kimberly

**Cc:** Snyder, Jeff; Carlson, Barbara; Pfeffer, Noel; 'ABennett@pbcgov.org'

**Subject:** RE: Records Request from Commission on Ethics

Lauren -

I discussed with COE investigator Mr. Bennett. He suggested leaving Irizarry and Serrano off the immediate response until their State Attorney investigation completes.

Pls send what we have on the others. I know that our original document search was some time ago; pls update to catch anything that has occurred since then.

Thanks

Jack Warner, Chief Financial Officer  
City of Delray Beach  
100 NW First Avenue  
Delray Beach, FL 33444  
(561) 243 - 7117  
[warner@mydelraybeach.com](mailto:warner@mydelraybeach.com)

---

**From:** Anthony Bennett [<mailto:ABennett@pbcgov.org>]  
**Sent:** Wednesday, March 30, 2016 3:31 PM  
**To:** Czencz, Lauren  
**Subject:** Records Request from Commission on Ethics

Good Afternoon Ms. Czencz,

I am currently investigating a few issues within your City. Based on statements given and information received from various sources, I am in need a few items that will assist me with this process. I have listed those items below...

1. Any contracts/agreements between the City of Delray Beach and the below listed persons/vendors/companies. If it was electronically submitted, please include the electronic signature(s) used if applicable/available.
2. Please provide copies of all checks and/or invoices that were made out to the below listed companies, listed individuals, or persons representing those companies. If you have a check number and date(s) of payment, that would be great as well. Also, if you have copies of "canceled" (signature affixed) checks, please provide those as well.

- ~~Delray Beach - Pressure Washing LLC~~
- ~~Joseph Tang - Long First Response, LLC~~
- ~~Cesar Trizany - American Traffic Products Services Inc.~~
- ~~Steven Swanson - Delray's Finest Signs & Graphics, LLC~~
- ~~Corey DeVary - First Response Training~~
- Gordon Eaton - Tropical Landscapers Inc.
- ~~Orlando Serrano - American Traffic Products Services Inc.~~

I am not in a major hurry, so as soon as practical for you would be fine in getting me those items. The items could be scanned or mailed, which ever works better for you and your staff. Also, if you need clarification on anything, please contact me directly. I thank you in advance for your assistance...

*Anthony C. Bennett*  
Chief Investigator  
Palm Beach County Commission on Ethics  
The Historic 1916 Palm Beach County Courthouse  
300 North Dixie Highway, Suite 450  
West Palm Beach, FL 33401

Ph 561-355-1956  
Fx 561-355-1904

[www.palmbeachcountyethics.com](http://www.palmbeachcountyethics.com)




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Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

Amount: \$800.00 Sequence Number: 6792030901  
 Account: [REDACTED] Capture Date: 08/10/2012  
 Bank Number: [REDACTED] Check Number: 477463

|                                                                                                                                             |  |                                                                                                     |                                                      |                               |
|---------------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------|------------------------------------------------------|-------------------------------|
|                                                            |  | <b>City of Delray Beach</b><br>100 N.W. 1st Avenue<br>Delray Beach, Florida 33444<br>(561) 243-7115 | Bank of America<br>Jacksonville, Florida<br>63-4/630 | <b>CHECK NUMBER</b><br>477463 |
|                                                                                                                                             |  | <b>CHECK DATE</b><br>08/03/2012                                                                     | <b>CHECK AMOUNT</b><br>\$*****800.00                 |                               |
| EIGHT HUNDRED AND 00/100 DOLLARS                                                                                                            |  |                                                                                                     |                                                      |                               |
| VOID AFTER 90 DAYS                                                                                                                          |  |                                                                                                     |                                                      |                               |
| PAY<br>VENDOR NO. 22580<br>TROPICAL LANDSCAPERS INC<br>8917 116TH TERRACE SOUTH<br>BOYNTON BEACH FL 33472                                   |  | <i>David T. Hardin</i><br><i>David Bayard</i><br>AUTHORIZED SIGNATURE                               |                                                      |                               |
| PAY TO THE ORDER OF<br>NATIONAL CITY BANK<br>LAKE WORTH, FL 33467-5203<br>FOR DEPOSIT ONLY<br>TROPICAL LANDSCAPERS INC.<br>IN CT 0001549518 |  |                                                                                                     |                                                      |                               |
| 001000053 00102012 100040000039850                                                                                                          |  |                                                                                                     |                                                      |                               |

Electronic Endorsements:

| Date       | Sequence        | Bank #     | Endrs Type   | TRN | RRC | Bank Name            |
|------------|-----------------|------------|--------------|-----|-----|----------------------|
| 08/10/2012 | 007000657313    | [REDACTED] | Undetermined | N   |     | PNC BANK, NATIONAL A |
| 08/10/2012 | 100840000039850 | [REDACTED] | Rtn Loc/BOFD | Y   |     | PNC BANK, NATIONAL A |
| 08/10/2012 | 006792030901    | [REDACTED] | Pay Bank     | N   |     | BANK OF AMERICA, NA  |

TROPICAL LANDSCAPERS, INC.

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL. 33472  
(561) 369-2899 / FAX: (561) 369-7680

# Invoice

| DATE      | INVOICE # |
|-----------|-----------|
| 7/13/2012 | 2012447   |

**BILL TO**

City of Delray Beach Florida  
100 N.W. 1st Avenue  
Delray Beach, FL 33444


**PAID**

| P.O. NO. | TERMS          | PROJECT |
|----------|----------------|---------|
| 173797   | Due on receipt |         |

| QUANTITY                     | DESCRIPTION                                       | RATE | AMOUNT                |
|------------------------------|---------------------------------------------------|------|-----------------------|
| 400                          | Spider Lily (1 Gal.)<br>REF: PICK-UP TICKET #6174 | 2.00 | 800.00                |
| Thank you for your business. |                                                   |      | <b>Total</b> \$800.00 |

Amount: 5375.00 Sequence Number: 5892696641  
 Account: [REDACTED] Capture Date: 06/08/2010  
 Bank Number: [REDACTED] Check Number: 450745

ORIGINAL CHECK PRINTED ON CHEMICAL RESISTANT PAPER



**City of Delray Beach**  
 100 N.W. 1st Avenue  
 Delray Beach, Florida 33444  
 (861) 243-7116

Bank of America  
 Jacksonville, Florida  
 62-4630

CHECK NUMBER  
**450745**

CHECK DATE  
**06/04/2010**

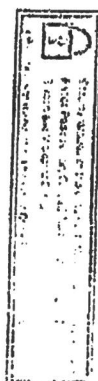
CHECK AMOUNT  
**\$\*\*\*\*\*375.00**

VOID AFTER 90 DAYS

THREE HUNDRED SEVENTY FIVE AND 00/100 DOLLARS

PAY 22580  
 VENDOR NO. TROPICAL LANDSCAPERS INC  
 PAY TO 8917 116TH TERRACE SOUTH  
 THE ORDER OF BOYNTON BEACH FL 33472

*Paul T. Haden*  
*J. J. [Signature]*  
 AUTHORIZED SIGNATURE



831800053< 06082010 100709000111510

PAY TO THE ORDER OF  
 NATIONAL CITY BANK  
 LANE NORTH, FL 33487-2201  
 1 30709150 4  
 FOR DEPOSIT ONLY  
 TROPICAL LANDSCAPERS INC.  
 DO NOT WRITE OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTIONS


Electronic Endorsements:

| Date       | Sequence        | Bank #     | Endrs Type   | TRN | RRC | Bank Name            |
|------------|-----------------|------------|--------------|-----|-----|----------------------|
| 06/08/2010 | 005892696641    | [REDACTED] | Undetermined | N   |     | BANK OF AMERICA, NA  |
| 06/08/2010 | 100709000111510 | [REDACTED] | Rtn Loc/BOFD | Y   |     | PNC BANK, NATIONAL A |
| 06/08/2010 | 007500763761    | [REDACTED] | Undetermined | N   |     | PNC BANK, NATIONAL A |



Amount: \$800.00 Sequence Number: 6792030901  
 Account: [REDACTED] Capture Date: 08/10/2012  
 Bank Number: [REDACTED] Check Number: 477463

ORIGINAL CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER



**City of Delray Beach**  
 100 N.W. 1st Avenue  
 Delray Beach, Florida 33444  
 (561) 243-7115

Bank of America  
 Jacksonville, Florida  
 63-4530

CHECK NUMBER  
**477463**

CHECK DATE  
**08/03/2012**

CHECK AMOUNT  
**\$\*\*\*\*\*800.00**

EIGHT HUNDRED AND 00/100 DOLLARS VOID AFTER 90 DAYS

PAY  
 VENDOR NO. 22580  
 TROPICAL LANDSCAPERS INC  
 8917 116TH TERRACE SOUTH  
 BOYNTON BEACH FL 33472

PAY TO THE ORDER OF

*David T. Harker*  
*David Bayal*

AUTHORIZED SIGNATURE

021000853 08102012 100840000039850


PAY TO THE ORDER OF  
 NATIONAL CITY BANK  
 LAKE WORTH, FL 33467-8903  
 FOR DEPOSIT ONLY  
 TROPICAL LANDSCAPERS INC.  
 JN CI -000154916

Electronic Endorsements:

| Date       | Sequence        | Bank #     | Endrs Type   | TRN | RRC | Bank Name            |
|------------|-----------------|------------|--------------|-----|-----|----------------------|
| 08/10/2012 | 007000657313    | [REDACTED] | Undetermined | N   |     | PNC BANK, NATIONAL A |
| 08/10/2012 | 100840000039850 | [REDACTED] | Rtn Loc/BOFD | Y   |     | PNC BANK, NATIONAL A |
| 08/10/2012 | 006792030901    | [REDACTED] | Pay Bank     | N   |     | BANK OF AMERICA, NA  |

Amount: 5375.00 Sequence Number: 5892696641  
 Account: [REDACTED] Capture Date: 06/08/2010  
 Bank Number: [REDACTED] Check Number: 450745

ORIGINAL CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER



**City of Delray Beach**  
 100 N.W. 1st Avenue  
 Delray Beach, Florida 33444  
 (561) 243-7115

Bank of America  
 Jacksonville, Florida  
 63-4/630

CHECK NUMBER  
**450745**

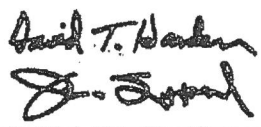
CHECK DATE  
**06/04/2010**

CHECK AMOUNT  
**\$\*\*\*\*\*375.00**

VOID AFTER 90 DAYS

THREE HUNDRED SEVENTY FIVE AND 00/100 DOLLARS

PAY 22580  
 VENDOR NO. TROPICAL LANDSCAPERS INC  
 8917 116TH TERRACE SOUTH  
 BOYNTON BEACH FL 33472

  
 AUTHORIZED SIGNATURE

03100053< 06082010 100709000111510

X

PAY TO THE ORDER OF  
 NATIONAL CITY BANK  
 LAKE WORTH, FL 33462-5203  
 P 267084199 4  
 FOR DEPOSIT ONLY  
 TROPICAL LANDSCAPERS INC.  
 DO NOT WRITE OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTION USE

Electronic Endorsements:

| Date       | Sequence        | Bank #     | Endrs Type   | TRN | RRC | Bank Name            |
|------------|-----------------|------------|--------------|-----|-----|----------------------|
| 06/08/2010 | 005892696641    | [REDACTED] | Undetermined | N   |     | BANK OF AMERICA, NA  |
| 06/08/2010 | 100709000111510 | [REDACTED] | Rtn Loc/BOFD | Y   |     | PNC BANK, NATIONAL A |
| 06/08/2010 | 007500763761    | [REDACTED] | Undetermined | N   |     | PNC BANK, NATIONAL A |

ADDRESS: 8917 116TH TERRACE SOUTH BOYNTON BEACH FL 33472

| DATE       | PO NO. | ACCOUNT NUMBER     | INVOICE NUMBER | PROJECT | AMOUNT        |
|------------|--------|--------------------|----------------|---------|---------------|
| 07/13/2012 | 684107 | 119-4144-572.52-26 | 6174           |         | 800.00        |
|            |        |                    |                |         | \$*****800.00 |



# TROPICAL LANDSCAPERS, INC.

8917 116th Terrace South  
Boynton Beach, FL 33473  
(561) 369-2899  
Fax (561) 369-7680

*W. Atlantic  
median*

|                            |       |                     |
|----------------------------|-------|---------------------|
| CUSTOMER'S ORDER NO.       | PHONE | DATE <i>7/13/12</i> |
| NAME <i>City of Delray</i> |       |                     |
| ADDRESS                    |       |                     |

|         |      |        |        |          |              |                             |
|---------|------|--------|--------|----------|--------------|-----------------------------|
| SOLD BY | CASH | C.O.D. | CHARGE | ON ACCT. | MDSE. RET'D. | PAID OUT <i>PO # 173797</i> |
|---------|------|--------|--------|----------|--------------|-----------------------------|

| QTY.       | DESCRIPTION           | PRICE     | AMOUNT |
|------------|-----------------------|-----------|--------|
| <i>100</i> | <i>Spider Lily #1</i> | <i>2-</i> |        |

RECEIVED

JUL 25 2012

FINANCE

City of Delray Beach  
Parks Maintenance  
Purchase Order *684107*  
Requisition # *173797*  
Account # *19-1144-572-526*  
Signature *[Signature]* Date *7/26/12*

PAID

AUG - 3 2012

RECEIVED BY *[Signature]*

TAX

TOTAL

6174

All claims and returned goods MUST be accompanied by this bill.

THANK YOU

# PURCHASE ORDER

## City of Delray Beach

DATE: 07/23/12

PURCHASING DIVISION  
100 NW FIRST AVENUE  
DELRAY BEACH, FLORIDA 33444  
561/243-7115

| P.O. NUMBER | PAGE |
|-------------|------|
| 684107      | 1    |

THIS NUMBER MUST APPEAR ON ALL  
INVOICES, PACKING LISTS, LABELS, BILLS  
OF LADING AND CORRESPONDENCE.

**VENDOR:**

TROPICAL LANDSCAPERS INC  
8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

**SHIP TO:**

City Of Delray Beach Florida  
PARKS MAINTENANCE  
320 SW 4TH STREET  
DELRAY BEACH, FL 33444

|                      |          |             |                                                |     |  |            |            |             |
|----------------------|----------|-------------|------------------------------------------------|-----|--|------------|------------|-------------|
| VENDOR               |          | DATE NEEDED |                                                | FOB |  | CONFIRM TO |            |             |
| 22580                |          | 07/25/12    |                                                |     |  |            |            |             |
| REQUISITIONED BY     |          |             | REQ. NO.                                       |     |  | TERMS      |            |             |
| J. FRIEDMAN (CONF)TS |          |             | 173797                                         |     |  | NET        |            |             |
| LINE NO.             | QUANTITY | UOM         | DESCRIPTION                                    |     |  |            | UNIT PRICE | TOTAL PRICE |
| 1                    | 400.00   | EA          | ACCOUNT: 11941445725226                        |     |  |            |            |             |
|                      |          |             | *****                                          |     |  |            |            |             |
|                      |          |             | * CONFIRMATION COPY *                          |     |  |            |            |             |
|                      |          |             | * DO NOT DUPLICATE *                           |     |  |            |            |             |
|                      |          |             | *****                                          |     |  |            |            |             |
|                      |          |             | SPIDER LILLIES, INVOICE 6174,<br>DATED 7.13.12 |     |  |            | 2.000      | 800.00      |
|                      |          |             | SUB-TOTAL                                      |     |  |            |            | 800.00      |
|                      |          |             | TOTAL                                          |     |  |            |            | 800.00      |

AP

BILL TO:  
CITY OF DELRAY BEACH  
ACCOUNTS PAYABLE  
100 NW 1ST AVENUE  
DELRAY BEACH, FL 33444

APPROVED:

FLORIDA STATE SALES TAX EXEMPTION  
CERTIFICATE NO. 85-8012621559C-4  
EXPIRATION DATE 08/31/2012

*David Boyd*

AUTHORIZED SIGNATURE

ORDER SUBJECT TO TERMS AND CONDITIONS AS ON REVERSE OR ATTACHED.

TROPICAL LANDSCAPERS, INC.

# Invoice

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL. 33472  
(561) 369-2899 / FAX: (561) 369-7680

| DATE      | INVOICE # |
|-----------|-----------|
| 7/13/2012 | 2012447   |

**BILL TO**

City of Delray Beach Florida  
100 N.W. 1st Avenue  
Delray Beach, FL 33444

| P.O. NO. | TERMS          | PROJECT |
|----------|----------------|---------|
| 173797   | Due on receipt |         |

| QUANTITY                     | DESCRIPTION                                                                       | RATE         | AMOUNT   |
|------------------------------|-----------------------------------------------------------------------------------|--------------|----------|
| 400                          | Spider Lily (1 Gal.)<br>REF: PICK-UP TICKET #6174<br><br><i>attach to invoice</i> | 2.00         | 800.00   |
| Thank you for your business. |                                                                                   | <b>Total</b> | \$800.00 |

RECEIVED  
JUL 30 2012  
FINANCE



RECEIVED  
JUL 30 2012  
FINANCE



PI610U02

City Of Delray Beach Florida

//1//1  
06:59:1

Number : 000017379

Purchase Requisition

Type information, p. ss Enter.

Type (F4) . . . . . 1 PURCHASE REQUISITION

Reason . . . . . PLANTS

By . . . . . J. FRIEDMAN

Date . . . . . 071712

Vendor number . . . . . 22580

Name (F4) . . . . . TROPICAL LANDSCAPERS INC \_ B=Begins with,C=Contains

Contract nbr (F4) . . . . .

Ship to (F4) . . . . . PM PARKS MAINTENANCE

Deliver by date . . . . . 072512

Fiscal year code . . . . . C C=Current year, P=Previous year, F=Future year

No line items to display.

Total:

F3=Exit

F4=Prompt

F6=Add item

F8=Requisition quotes

F12=Cancel


F20=Comments

F21=Copy

P.O.

RECEIVED  
JUL 30 2012  
FINANCE

Amount: \$189.00 Sequence Number: 4792941243  
Account: [REDACTED] Capture Date: 05/22/2014  
Bank Number: [REDACTED] Check Number: 497888

| ORIGINAL CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER                                                  |                                                                                                     |
|-------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
|                      | <b>City of Delray Beach</b><br>100 N.W. 1st Avenue<br>Delray Beach, Florida 33444<br>(561) 243-7115 |
|                                                                                                       | <b>Bank of America</b><br>Jacksonville, Florida<br>63-4/630                                         |
| <b>CHECK NUMBER</b><br>497888                                                                         |                                                                                                     |
| <b>CHECK DATE</b><br>05/16/2014                                                                       | <b>CHECK AMOUNT</b><br>\$*****189.00                                                                |
| VOID AFTER 90 DAYS                                                                                    |                                                                                                     |
| PAY ONE HUNDRED EIGHTY NINE AND 00/100 DOLLARS                                                        |                                                                                                     |
| VENDOR NO. 22580                                                                                      |                                                                                                     |
| PAY TO THE ORDER OF<br>TROPICAL LANDSCAPERS INC<br>8917 116TH TERRACE SOUTH<br>BOYNTON BEACH FL 33472 |                                                                                                     |
| <i>Amé Chipman, Jr.</i><br><i>Milena L. Walinski</i>                                                  |                                                                                                     |
| AUTHORIZED SIGNATURE                                                                                  |                                                                                                     |

|                                                                                                                                                         |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 20140522-003200326944 00100974004                                                                                                                       |  |
| PAY TO THE ORDER OF<br>NATIONAL CITY BANK<br>LAKE WORTH, FL 33467-5203<br>P 267094199 4<br>FOR DEPOSIT ONLY<br>TROPICAL LANDSCAPERS INC.<br>00015159618 |  |

Electronic Endorsements:

| Date       | Sequence     | Bank #     | Endrs Type   | TRN | RRC | Bank Name            |
|------------|--------------|------------|--------------|-----|-----|----------------------|
| 05/22/2014 | 003200326944 | [REDACTED] | Rtn Loc/BOFD | Y   |     | PNC BANK, NATIONAL A |
| 05/22/2014 | 004792941243 | [REDACTED] | Pay Bank     | N   |     | BANK OF AMERICA, NA  |

ADDRESS: 8917 116TH TERRACE SOUTH BOYNTON BEACH FL 33472

Ref. No: G 8952002278

TROPICAL LANDSCAPERS, INC.

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL. 33472  
(561) 369-2899 / FAX: (561) 369-7680

# Invoice

| DATE     | INVOICE # |
|----------|-----------|
| 5/1/2014 | 2014343   |

**BILL TO**

City of Delray Beach Florida  
100 N.W. 1st Avenue  
Delray Beach, FL 33444

| P.O. NO. | TERMS          | PROJECT |
|----------|----------------|---------|
| 188128   | Due on receipt |         |

| QUANTITY                           | DESCRIPTION           | RATE         | AMOUNT   |
|------------------------------------|-----------------------|--------------|----------|
| 7                                  | Neo Chantini 8"       | 15.00        | 105.00   |
| 7                                  | Neo Chantini (7 Gal.) | 12.00        | 84.00    |
| REF: PICK-UP TICKET #7592          |                       |              |          |
|                                    |                       | <b>PAID</b>  |          |
|                                    |                       | MAY 16 2014  |          |
| RECEIVED<br>MAY 07 2014<br>FINANCE |                       |              |          |
| Thank you for your business.       |                       | <b>Total</b> | \$189.00 |

*Park's*

Worth 9



**TROPICAL LANDSCAPERS, INC.**

8917 116th Terrace South  
Boynton Beach, FL 33472  
(561) 369-2899  
Fax (561) 369-7680

CUSTOMER'S ORDER NO. \_\_\_\_\_ PHONE \_\_\_\_\_ DATE 5/14/14  
NAME \_\_\_\_\_  
ADDRESS City of Delray Beach

SOLD BY \_\_\_\_\_ CASH \_\_\_\_\_ C.O.D. \_\_\_\_\_ CHARGE \_\_\_\_\_ ON ACCT. \_\_\_\_\_ MDSE. RET'D. \_\_\_\_\_ PAID OUT DO  
QTY. \_\_\_\_\_ DESCRIPTION \_\_\_\_\_ PRICE \_\_\_\_\_ AMOUNT 188128

|   |                    |     |      |
|---|--------------------|-----|------|
| 7 | Neo<br>Chartier 8" | 15- | 105- |
| 7 | New chartier<br>#1 | 12- | 84-  |

**PAID**  
MAY 16 2014

City of Delray Beach  
Parks Maintenance  
Purchase Order 698313  
Requisition # 188128  
Account # 001-4131-572-5226  
Signature \_\_\_\_\_ Date 5/14/14 RW

RECEIVED BY Raul B... TAX \_\_\_\_\_  
TOTAL \_\_\_\_\_

7592

All claims and returned goods MUST be accompanied by this bill.

**THANK YOU**

# PURCHASE ORDER

DATE: 05/06/14

## City of Delray Beach

PURCHASING DIVISION  
100 NW FIRST AVENUE  
DELRAY BEACH, FLORIDA 33444  
561/243-7115

| P.O. NUMBER | PAGE |
|-------------|------|
| 698313      | 1    |

THIS NUMBER MUST APPEAR ON ALL  
INVOICES, PACKING LISTS, LABELS, BILLS  
OF LADING AND CORRESPONDENCE.

### VENDOR:

TROPICAL LANDSCAPERS INC  
8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL 33472

### SHIP TO:

City Of Delray Beach Florida  
PARKS MAINTENANCE  
320 SW 4TH STREET  
DELRAY BEACH, FL 33444

|                    |          |             |                                                           |     |  |            |             |             |
|--------------------|----------|-------------|-----------------------------------------------------------|-----|--|------------|-------------|-------------|
| VENDOR             |          | DATE NEEDED |                                                           | FOB |  | CONFIRM TO |             |             |
| 22580              |          | 05/01/14    |                                                           |     |  |            |             |             |
| REQUISITIONED BY   |          |             | REQ. NO.                                                  |     |  | TERMS      |             |             |
| S. MATSON (CONF)TS |          |             | 188128                                                    |     |  | NET        |             |             |
| LINE NO.           | QUANTITY | UOM         | DESCRIPTION                                               |     |  |            | UNIT PRICE  | TOTAL PRICE |
|                    |          |             | ACCOUNT: 00141315725226                                   |     |  |            |             |             |
|                    |          |             | *****                                                     |     |  |            |             |             |
|                    |          |             | * CONFIRMATION COPY *                                     |     |  |            |             |             |
|                    |          |             | * DO NOT DUPLICATE *                                      |     |  |            |             |             |
|                    |          |             | *****                                                     |     |  |            |             |             |
| 1                  | 7.00     | EA          | CHANTIRI 8" FLOWERS                                       |     |  |            | 15.000      | 105.00      |
| 2                  | 7.00     | EA          | CHANTIRI FLOWERS 1"<br>WORTHING PARK<br>INV# 7592, 5.1.14 |     |  |            | 12.000      | 84.00       |
|                    |          |             |                                                           |     |  |            | SUB-TOTAL   | 189.00      |
|                    |          |             |                                                           |     |  |            | TOTAL       | 189.00      |
|                    |          |             |                                                           |     |  |            | PAID        |             |
|                    |          |             |                                                           |     |  |            | MAY 16 2014 |             |

**PAID**

MAY 16 2014

AP

BILL TO:  
CITY OF DELRAY BEACH  
ACCOUNTS PAYABLE  
100 NW 1ST AVENUE  
DELRAY BEACH, FL 33444

FLORIDA STATE SALES TAX EXEMPTION  
CERTIFICATE NO. 85-8012621559C-4  
EXPIRATION DATE 08/31/2017

APPROVED:

*Milena L. Walinski*

AUTHORIZED SIGNATURE

ORDER SUBJECT TO TERMS AND CONDITIONS AS ON REVERSE OR ATTACHED.

C15-029



**Gizelle Reyes**

VP, Branch Manager

NMLS ID 576160

T 561-969-3333 F 561-966-3886

gizelle.reyes@pnc.com T 888-762-2265

**Member of The PNC Financial Services Group**

3989 Forest Hill Boulevard A2-P990-01-1  
West Palm Beach Florida 33406

**¡Hablo  
Español!**



## Anthony Bennett

---

**From:** Tropical Landscapers [tropicallandscapers@gmail.com]  
**Sent:** Thursday, April 21, 2016 2:25 PM  
**To:** Anthony Bennett  
**Subject:** Orders  
**Attachments:** City of Delray Beach.pdf

Dear Mr. Bennett,

I did some research after you paid a visit to my office and found the following invoices for material that was picked up at our nursery back in 2010 and 2012. Both orders have a PO number at the top and were picked up in person at our nursery.

Thank you,  
Cathy Kleinrichert  
Office (561) 369-2899



TROPICAL LANDSCAPERS, INC.

# Invoice

8917 116TH TERRACE SOUTH  
BOYNTON BEACH, FL. 33472  
(561) 369-2899 / FAX: (561) 369-7680

| DATE     | INVOICE # |
|----------|-----------|
| 5/5/2010 | 2010398   |

**BILL TO**

City of Delray Beach Florida  
100 N.W. 1st Avenue  
Delray Beach, FL 33444

**PAID**

| P.O. NO. | TERMS | PROJECT |
|----------|-------|---------|
| 156898   |       |         |

| QUANTITY                     | DESCRIPTION             | RATE         | AMOUNT   |
|------------------------------|-------------------------|--------------|----------|
| 100                          | Crown of Thorn (3 Gal.) | 3.75         | 375.00   |
| Thank you for your business. |                         | <b>Total</b> | \$375.00 |