

STATE OF RHODE ISLAND

BEFORE THE RHODE ISLAND ETHICS COMMISSION

IN RE: MAYOR SUSAN D. MENARD  
Respondent

Complaint No. 2008-1  
(For Office Use Only)

COMPLAINT

The undersigned Complainant(s) files this Complaint in the public interest and requests that the Rhode Island Ethics Commission conduct an investigation into certain conduct and activities of the above-named Respondent, for the purpose of determining whether said Respondent has violated the Rhode Island Code of Ethics.

To the best of my(our) information and belief, said Respondent has violated the Rhode Island Code of Ethics as follows:

1. Respondent is: (Please check one and fill in Respondent's title)

- a state or municipal elected official: MAYOR
- a state or municipal appointed official: \_\_\_\_\_
- an employee of state or local government or of a board, commission or agency: \_\_\_\_\_

2. The Respondent's home or business address is (include telephone number if known):

Name CITY OF WOONSOCKET Tel. No. 401-762-6400  
 Street 169 MAIN ST City and State: WOONSOCKET, RI 02895

(Set forth below in separately numbered paragraphs each specific act complained of including the time and place of its occurrence.)

3. (SEE ATTACHED)
- 
- 
- 
- 

RECEIVED  
 RHODE ISLAND  
 ETHICS COMMISSION  
 08 MAR -6 AM 9:29

I (We) acknowledge that the facts above-stated are true and accurate to the best of my(our) knowledge.

DATE: 3/3/08

Edward M. Roy  
Signature of Complainant

EDWARD M. ROY  
Print Name

63 LILAC AVE  
Address

WOONSOCKET, RI 02895

Home                      Cell  
(401) 765-1646      447-3170  
Telephone Number

State of Rhode Island  
County of PROVIDENCE

Subscribed and sworn to by the above-signed at Woonsocket before me this  
3rd day of MARCH 2008

Todd R. Brien  
NOTARY PUBLIC  
TODD R. BRIEN

My Commission Expires: 1-09  
(SEAL)

On or about the 14<sup>th</sup> of Feb 2008 a controversial topic regarding a purchase of four Harley Davidson motorcycles for the Woonsocket Police Department arose on local talk radio WNRI during the Dave Kane show. The controversy surrounding the motorcycles was where they purchased, and why they would be purchased during such bad financial times in both the City of Woonsocket and the State of RI. Speculation was that the motorcycles were purchased from a dealership owned or operated by the son-in-law of Woonsocket's Mayor, Susan Menard.

As a twenty five year retired Det. Sgt. of the Woonsocket Police Department, and being active in city politics as a candidate for City Council in Nov. of 2007, I had insight as to where the motorcycles may have come from. I had knowledge that Mayor Menard's son-in-law, James Pilavin, was a principal in Precision Harley Davidson in Pawtucket RI and Paramount Harley Davidson of Framingham Ma. (See attachments)

Confirmation of the acquisition of the Harley Davidson police motorcycles was made on WNRI's Larry Poitras show on or about 2/15/08 by Woonsocket Police Chief Michael Houle. A frequent guest on the Larry Poitras show Chief Houle reported that the department did just acquire four new Harley Davidson motorcycles. He also confirmed for the public that they were not purchased, they were leased. He confirmed that they came from Paramount and the Mayor's son-in-law was in fact a principal of the dealership. Houle noted that the fact the Mayor's son-in-law was the owner of the dealership was a good thing for Woonsocket because extras were thrown in at no cost. Houle also addressed the concerns of about where the money for the motorcycles was coming from. He reported that the money was coming from CDBG (community development block grant) funds. He further stated that the lease was \$10,000 a year for all four motorcycles and they were attached to the bid process of the Boston Police Department, just as the Woonsocket Police Cruisers are.

Hearing the controversy surrounding the purchase of the motorcycles, and being a recent council candidate running on fiscal conservation and open government, I did some investigating on my own. Searching the Woonsocket CDBG funds I found no allocation for motorcycles listed. I went to the city Council meeting on Feb. 18, 2008 and spoke under the Citizens good and welfare at the onset of the meeting. I voiced my concerns about where the money was coming from, informing the council that there was no allocations listed for motorcycles in the CDBG program. City Planning Director Joel Matthews, the administrator of CDBG program, confirmed that the money for the motorcycles was not coming from CDBG. I also brought up to possibility that the purchase or lease of police motorcycles through a dealership owned by her son-in-law, a contributor to her Mayoral Campaign (see attached documents), was a possible conflict of interest or ethics violation. EMK.

As the council members spoke under their good and welfare portion of the meeting several voiced some of the same concerns I had. Councilman John Ward had done his own research and found that Woonsocket is in fact a member of the Greater Boston Police Council which allowed Woonsocket to purchase police vehicles through bid contracts negotiated by the Police Council. Mr. Ward questioned why the leased motorcycles came from Paramount and not the contracted dealer, Bruce Rossmeyer's Boston Harley Davidson, Everett Ma. Council members Vadnais, Beauchamp, Schneck and Council President Fontaine echoed Mr. Ward's concerns, some also questioning competitive bidding. Councilman Schneck asked the city solicitor for an opinion on possible ethics violations or conflict on the part of the Mayor.

On the morning of Feb. 19<sup>th</sup>, the day after the council meeting Mayor Susan Menard made her weekly appearance WNRI's Up Front program with Roger Bouchard. When asked about the motorcycle controversy Mayor Menard confirmed that the motorcycles were in fact coming from a dealership owned by her son-in-law, affirmed what Chief Houle reported concerning the cost of the lease, but corrected him as to where the money was coming from. She reported that the money was coming from Justice Departments Local Law Enforcement Block Grants (LLEBG) and not costing taxpayers any money. Mayor Menard also took time to assure the concerned taxpayers that getting the motorcycles from her son-in-law was best for the city because of the extras thrown in.

I was also provided copies of City of Woonsocket vouchers documenting payments to Paramount Harley Davidson. (See attached documents) Payments have been made for what appear to be contracts every two years which contradicts Mayor Menard's report that the leases were for one year.

In the public's interest I am filing a complaint that Mayor / Public Safety Director Susan D. Menard being an elected municipal official, in a major decision making position, was involved in the leasing process for Woonsocket Police Department Harley Davidson motorcycles, with Paramount Harley Davidson of Framingham Ma., a dealership of which her son-in-law, James Pilavin, is a principal, a dealership not under contract by the Greater Boston Police Council, is an egregious violation of the Rhode Island General Laws, specifically, Title 36, Chapter 36-14 Code of Ethics.

Said violations took place on or about, 8/20/02, 4/16/04, 6/27/06 and 2/18/08 *EML*

Edward M. Roy  
63 Lilac Ave.  
Woonsocket, RI 02895



**State of Rhode Island and Providence Plantations  
Office of the Secretary of State**

Corporations Division  
148 W. River Street  
Providence, Rhode Island 02904-2615  
Telephone: (401) 222-3040



**PRECISION HARLEY-DAVIDSON, INC. Summary Screen**

Help with this form

Request a Certificate

**The exact name of the Domestic Profit Corporation:** PRECISION HARLEY-DAVIDSON, INC.

**The name was changed from:** AP ACQUISITION INC. on 2/24/1994

**Merged with :** Precision Harley-Davidson, Inc. on 2/24/1994

**Entity Type:** Domestic Profit Corporation

**Identification Number:** 000074881

**Date of Incorporation in Rhode Island:** 12/08/1993

**The location of its principal office:**

No. and Street: 269 ARMISTICE BOULEVARD

City or Town: PAWTUCKET

State: RI Zip: 02860 Country: USA

**The mailing address or specified office:**

No. and Street:

City or Town:

State:

Zip:

Country:

**Agent Resigned:** N

**Address Maintained:** Y

**Name and address of the Registered Agent:**

No. and Street: 34 HAMLET AVENUE

City or Town: WOONSOCKET

State: RI

Zip: 02895

Name: HOWARD R. CROLL

**The officers and all of the directors of the corporation:**

Title	Individual Name First, Middle, Last, Suffix	Address Address, City or Town, State, Zip Code, Country
PRESIDENT	RICHARD PILAVIN	269 ARMISTICE BOULEVARD PAWTUCKET, RI 02860 USA

**The total number of shares and par value, if any, of each class of stock which the business entity is**

**authorized to issue:**

Class of Stock	Series of Stock	Par Value Per Share	Total Authorized Shares <i>Num of Shares</i>	Total Issued and Outstanding <i>Num of Shares</i>
CNP		\$0.00	2,000.00	2,000.00

**Purpose**

MOTORCYCLE SALES AND SERVICE

TITLE: 7-1.1-51

**Select a type of filing from below to view this business entity filings:**

- ALL FILINGS ^
- Annual Report
- Application for Reservation of Entity Name
- Articles of Amendment
- Articles of Dissolution v

[Click Here](#) to access 2006 and 2007 annual reports filed and imaged prior to July 25, 2007. Identification Number is Required



**The Commonwealth of Massachusetts  
William Francis Galvin**

Secretary of the Commonwealth, Corporations Division  
One Ashburton Place, 17th floor  
Boston, MA 02108-1512  
Telephone: (617) 727-9640

**PARAMOUNT HARLEY-DAVIDSON, LLC Summary Screen**

Help with

[Request a Certificate](#)

**The exact name of the Domestic Limited Liability Company (LLC):** PARAMOUNT HARLEY-DAVIDSON, LLC

**Entity Type:** Domestic Limited Liability Company (LLC)

**Identification Number:** 043563651

**Old Federal Employer Identification Number (Old FEIN):** 000754647

**Date of Organization in Massachusetts:** 05/23/2001

**The location of its principal office:**

No. and Street: 266 WAVERLY ST.  
City or Town: FRAMINGHAM State: MA Zip: 01701-0000 Country: USA

**If the business entity is organized wholly to do business outside Massachusetts, the location of that office:**

No. and Street:  
City or Town: State: Zip: Country:

**The name and address of the Resident Agent:**

Name: JAMES PILAVIN  
No. and Street: 21 COLUMBINE RD.  
City or Town: NEWTON State: MA Zip: 02459-0000 Country: USA

**The name and business address of each manager:**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	JOAN C. NEWMAN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA
MANAGER	JAMES PILAVIN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA
MANAGER	STANLEY PILAVIN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA

**The name and business address of the person in addition to the manager, who is authorized to execute documents to be filed with the Corporations Division.**



Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	STANLEY PILAVIN	21 COLUMBINE RD. NEWTON, MA 02459-0000 USA
SOC SIGNATORY	JAMES PILAVIN	21 COLUMBINE RD. NEWTON, MA 02459-0000 USA
SOC SIGNATORY	JAMES PILAVIN	21 COLUMBINE RD. NEWTON, MA 02459-0000 USA

**The name and business address of the person(s) authorized to execute, acknowledge, deliver and recordable instrument purporting to affect an interest in real property**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	STANLEY PILAVIN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA
REAL PROPERTY	JAMES PILAVIN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA
REAL PROPERTY	JAMES PILAVIN	266 WAVERLY ST. FRAMINGHAM, MA 01701-0000 USA

Consent   
  Manufacturer   
  Confidential Data   
  Does Not Require Annual Re  
 Partnership   
 Resident Agent   
 For Profit   
 Merger Allowed

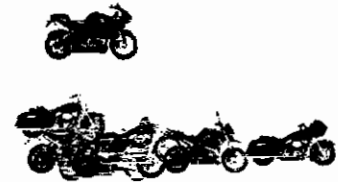
**Select a type of filing from below to view this business entity filings:**

- ALL FILINGS 
- Annual Report
- Articles of Entity Conversion
- Certificate of Amendment
- Certificate of Cancellation 

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Comments
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## About Us



Welcome to Precision Harley-Davidson/Buell, one of the world's finest Harley-Davidson and Buell dealerships founded in 1990 by the Pilavin brothers

Stan, Rich and Jim.

The Pilavins got their start back in 1980 when they opened a Harley aftermarket parts and accessories store, called Motorcycle Warehouse, in Framingham, Massachusetts. 7 years later, they established their first Harley dealership, Precision Harley-Davidson/Buell, in Pawtucket, Rhode Island. The success of this Dealership led to the opening of a second store in January 2002 named Paramount Harley-Davidson/Buell which incidently brought them back to where it all began Framingham, Massachusetts.

In addition to a really great selection of new Harley® and Buell® motorcycles, Precision offers state-of-the-art Service, a fully stocked Parts Department and an unparalleled selection of riding clothes and accessories.

- Home**
- Dealer Info**
  - About Us
  - Map/Hours
  - Email Us
- Showroom**
  - 2008 H-D® Bikes
  - 2007 H-D® Bikes
  - 2008 Buell® Bikes
  - 2007 Buell® Bikes
  - Pre-Owned Trailers
- Dealer Services**
  - Service Dept.
  - Custom Services
  - H-D® Apparel
  - Parts Dept.
  - Financing
  - Specials
- Toy Chest**
- Customer Corner**
  - Customer Survey
  - Testimonials
  - News Headlines
  - Events
  - Fun Photos
  - Guest Book
  - Employment
  - Links
  - H-D.com
  - Buell.com
  - H.O.G.com

**LO/JACK**  
Get it. And get it back.™



**Precision Harley-Davidson**  
269 Armistice Blvd Pawtucket RI 02860  
Phone: (401) 724-0010 Fax: (401) 724-3610

Visit our sister store

<http://www.precisionhd.com/aboutus.asp>

3/2/2008



- Home**
- Dealer Info**
- Showroom**
- Dealer Services**
- Customer Corner**

### About Us



Welcome to Paramount Harley-Davidson, the world's new Harley-Davidson Buell dealer. Founded in 2002 by the brothers

and Jim, Paramount may be new in terms of years but carries a lot of experience.

The Pilavins got their start back in 1980 when they opened a motorcycle aftermarket parts and accessories store called Motorcycle World in Framingham, Massachusetts. Ten years later, in 1990, they opened their first Harley dealership, Precision Harley-Davidson in Pawtucket, Rhode Island.

In addition to a really great selection of new Harley-Davidson motorcycles, Paramount offers state of the art Service, a full Parts Department and an unparalleled selection of Harley-Davidson accessories.



**Click here to visit the Metro West H.O.G. Web Site.**

Paramount Harley-Davidson  
 266-300 Waverly Street, Route 135 Framingham, MA 01702  
 Phone: (508) 879-6666 Fax: (508) 870-3883



266-300 Waverly Street (Route 135) || Framingham, MA 01702 || ph: (508

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Action: &Invoices Chec&ks P&urch Orders Recurring In&v ... \*  
 \*View AP Invoices for the current vendor. \*  
 \*Vendor [ 13165] Status [A] \*  
 \*Name [PARAMOUNT HARLEY DAVIDSON ] Entered [08/19/02] \*  
 \*\*\*\*\*

\*\*\*\*\*

\*\*Action: \*\*  
 \*\* \*\*  
 \*\*===== Page 1 of 1  
 =====\*\*

** Invoice	Inv Date	P.O.	Warrant	S	Check #	Amount **
**1	2-18-08	02/18/08 160739	7380JM	P	3	10,000.00 **
**2					**	**
**3					**	**
**4					**	**
**5					**	**
**6					**	**
**7					**	**
**8					**	**
**9					**	**
**0					**	**

\*\* Vend 13165 PARAMOUNT HARLEY DAV has 1 Invoices for: 10,000.00

VENDOR INQUIRY/REPORTS - CITY OF WOONSOCKET

Action:  Checks  Purch Orders  Recurring Inv ...

View AP Invoices for the current vendor.

Vendor [13165] Status [A]  
 Name [PARAMOUNT HARLEY DAVIDSON] Entered [08/19/02]

Action:

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Page 1 of 1

Invoice	Inv Date	P.O.	Warrant	S	Check #	Amount
1 6-27-06	06/27/06		4851JM	P	71347	10,000.00
2						
3						
4						
5						
6						
7						
8						
9						
0						

Vend 13165 PARAMOUNT HARLEY DAV has 1 Invoices for: 10,000.00

VENDOR INQUIRY/REPORTS - CITY OF WOONSOCKET  
 Action: [ ] Chec&ks P&urch Orders Recurring In&v ...  
 View AP Invoices for the current vendor.  
 Vendor [ 13165] Status [A]  
 Name [PARAMOUNT HARLEY DAVIDSON] Entered [08/19/02]

Action: [ ]

Invoice	Inv Date	P.O.	Warrant	S	Check #	Amount
1 4-16-04	04/16/04	130780	1232JM	P	1	10,000.00
2						
3						
4						
5						
6						
7						
8						
9						
0						

Vend 13165 PARAMOUNT HARLEY DAV has 1 Invoices for: 10,000.00





**Rhode Island Board of Elections  
Campaign finance Electronic Reporting & Tracking System (ERTS)**

**Detailed Contribution Report**

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Report Created: March 2, 2008 10:52 PM

<b>Trans #</b>	<b>Contribution Type</b>	<b>Receipt Date</b>	<b>Deposit Date</b>	<b>Amount</b>	<b>MPF</b>
251051	Individual	07/10/2007	07/16/2007	\$750.00	N/A

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<b>Organization</b>	SUSAN D MENARD				
<b>Trans Type</b>	Check				
<b>Donor Name</b>	PILAVIN, JAMES	<b>Employer Name</b>	PRECISION MOTORCYCLE		
<b>Donor Address</b>	21 COLUMBINE ROAD		<b>Employer Address</b>		
	NEWTON, MA				

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**Contribution Explanation**

<b>Incomplete Description</b>	Employer Address1
	Employer City
	Employer State

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[Close Window](#)

**GREATER BOSTON POLICE COUNCIL  
MEMBER AGENCIES FY08**

Agency	Membership Level	FY08 Pay Date
West Boylston Police Department	Associate	08/06/07
West Newbury Police Department	Bapern	07/24/07
West Springfield Police Department	Associate	08/14/07
West Tisbury Police Department	Associate	08/06/07
West Warwick Police Department	Associate	09/24/07
Westboro Police Department	Associate	07/30/07
Westfield Police Department	Associate	09/24/07
Westford Police Department	Bapern	08/20/07
Weston Police Department	Bapern	08/06/07
Westwood Police Department	Bapern	08/06/07
Weymouth Police Department	Bapern	08/20/07
Wilbraham Police Department	Associate	08/13/07
Williams College	Associate	07/30/07
Williamstown Police Department	Associate	08/06/07
Wilmington Police Department	Bapern	08/20/07
Winchendon Police Department	Associate	08/20/07
Winchester Police Department	Bapern	08/06/07
Winthrop Police Department	Bapern	11/26/07
Woburn Police Department	Bapern	10/20/07
Woonsocket Police Department	Associate	08/06/07
Worcester Department of Public Works	Associate	08/20/07
Worthington Highway Department	Associate	08/13/07
Wrentham Police Department	Bapern	08/13/07
Yarmouth Police Department	Associate	08/20/07

Associate	157
Bapern	143
<b>Total Members</b>	<b>300</b>