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STATE OF RHODE ISLAND  
BEFORE THE RHODE ISLAND ETHICS COMMISSION

In re: **Dan Patterson**  
**Respondent**

**Complaint No. 2022-8**

**INFORMAL RESOLUTION AND SETTLEMENT**

The Respondent, Dan Patterson,<sup>1</sup> and the Rhode Island Ethics Commission (“Commission”) hereby agree to a resolution of the above-referenced matter as follows:

**I. FINDINGS OF FACT & ADMISSIONS**

1. The Respondent has been serving as a member of the Exeter Town Council (“Town Council”) since his election thereto in November 2014 and as its President since November 2020.

2. The Respondent has been a part owner of property located at Goodfellow Road, Groton, Vermont (“property”) since 1993.<sup>2</sup>

3. The Respondent did not disclose his ownership interest in the property in response to the Real Estate question on 2016-2021 Financial Disclosure Statements (“2016-2021 Statements”) filed with the Commission.

4. On May 30, 2022, prior to the filing of the instant Complaint, the Respondent amended his 2016-2021 Statements to include his interest in the property in response to the Real Estate question.

5. Since 2005, the Respondent and his spouse have been co-owners of Shanbri Farm LLC (“Shanbri Farm”), located in Exeter, Rhode Island. Shanbri Farm, a retail nursery and gift

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<sup>1</sup> The Complaint was filed against “Dan Patterson,” as is reflected in the caption of this agreement. However, the Respondent represented that his full name is Daniel W. Patterson.

<sup>2</sup> The Complaint alleges that the Respondent failed to disclose his interest in real property located at 134 Willow Lane in Groton, VT (Lot 12-139). Willow Lane and Goodfellow Road are one and the same. The legal address for the Respondent’s property and the address for which he receives tax assessments is Goodfellow Road, Groton, VT.

shop, also operates as Shanbri Arms, a seller of firearms.<sup>3</sup>

6. The Respondent did not disclose his and his spouse's ownership interests in Shanbri Farm in response to the question relating to Last Year Business Ownership Interests on his 2016-2021 Statements. The Respondent represented that because Shanbri Farm has been operating at a loss since 2016, he did not believe that he was required to disclose the business.

7. As a member of the Town Council, the Respondent receives an annual stipend for his service thereon. The Respondent received a stipend in 2016 and 2017 in the amount of \$2,900 for each year, and he received a stipend in the amount of \$3,045 for each year from 2018 through 2021.

8. The Respondent did not disclose his annual stipend in response to the Family Income Sources question on his 2016-2021 Statements. He represented that he did not disclose his stipend on the basis that he was filing as a result of his position on the Town Council for which he received the stipend.

9. Prior to meeting and entering into this agreement with the Prosecution, the Respondent had amended his 2016-2021 Statements, on August 9 and 14, 2022, to disclose his stipend in response to the question relating to Family Income Sources.

10. The Respondent presented to the Commission's office on August 18, 2022, to discuss the allegations raised in the Complaint and how to ensure full compliance on his 2016-2021 Statements. The Respondent met with the Prosecution to review his statements and identify all required disclosures, including any not alleged in the Complaint.

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<sup>3</sup> Shanbri Arms is not registered with the Rhode Island Secretary of State's Office. It is a part of Shanbri Farm and does not operate as a separate entity. Shanbri Farm holds a federal firearms license ("FFL") and is licensed by the Town to sell firearms. Hereinafter, all references to "Shanbri Farm" shall include Shanbri Arms where applicable.

11. After meeting with the Prosecution and prior to executing this agreement, the Respondent amended his 2016-2021 Statements to disclose his and his spouse's ownership interests in Shanbri Farm in response to the question relating to Last Year Business Ownership Interests on his 2016-2021 Statements.

12. Although not referenced in the Complaint, after meeting with the Prosecution the Respondent also made the following necessary amendments to his Statements: (1) He disclosed that Shanbri Farm conducted business with the Town in excess of \$250 on his 2017, 2019, and 2020 Statements;<sup>4</sup> and (2) he disclosed that he and his spouse were both Managers of Shanbri Farm on his 2016-2021 Statements.

## II. CONCLUSIONS OF LAW

1. As a member of the Exeter Town Council, a municipal elected official, the Respondent was subject to the Financial Disclosure mandate of R.I. Gen. Laws § 36-14-16(a)(4).

2. On his 2016-2021 Statements filed with the Commission, the Respondent failed to disclose his and his spouse's ownership interests in Shanbri Farm, as required by R.I. Gen. Laws § 36-14-17(b)(7) and 520-RICR-00-00-4.10 Business Interest (36-14-17007).

3. On his 2016-2021 Statements filed with the Commission, the Respondent failed to disclose his annual stipend received as a member of the Town Council, as required by § 36-14-17(b)(2) and Commission Regulation 520-RICR-00-00-4.4 Occupational Income (36-14-17001).

4. On his 2017, 2019, and 2020 Statements filed with the Commission, the Respondent failed to disclose that Shanbri Farm conducted business with the Town in excess of

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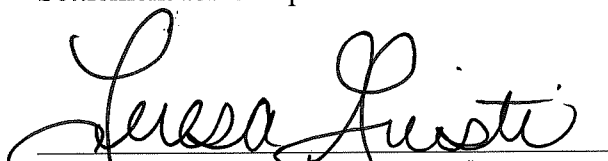
<sup>4</sup> The investigation revealed that Shanbri Farm sold to the Town holiday items such as wreaths and window boxes. In 2017, Shanbri Farm sold window boxes and wreaths to the Town totaling \$270; in 2019, Shanbri Farm sold window boxes and wreaths to the Town totaling \$260; and in 2020, Shanbri Farm sold window boxes and wreaths totaling \$270. For the years 2016, 2018, and 2021, Shanbri Farm's sales to the Town totaled \$250 or less and did not require disclosure on the respective statements.

\$250 for each of those years, as required by Commission Regulation 520-RICR-00-00-4.9 Doing Business with a State or Municipal Agency (36-14-17006).


### III. SETTLEMENT

Pursuant to the above Findings of Fact and Conclusions of Law, the Respondent and the Commission Prosecutor agree, subject to the approval of the Rhode Island Ethics Commission, pursuant to R.I. Gen. Laws § 36-14-13(d) and 520-RICR-00-00-3.16 Informal Disposition (1011), to the following:

1. The Commission shall enter an Order and Judgment that the Respondent failed to disclose on his 2016-2021 Statements his and his spouse's ownership interests in Shanbri Farm and the annual stipend he received as a Town Council member, and on his 2017, 2019, and 2020 Statements that Shanbri Farm conducted business with the Town in excess of \$250 for each of those years.
2. The Respondent agrees that, pursuant to the above Findings of Fact and Conclusions of Law, the Prosecution will recommend the imposition of a \$500 civil penalty.
3. The Respondent further agrees that Shanbri Farm will not sell or enter into a contract to sell any products to the Town for the duration of his tenure as a member of the Town Council, unless the contract is awarded in a manner that comports with the requirements of § 36-14-5(h).
4. The above terms represent the full and complete Informal Resolution and Settlement for Complaint No. 2022-8.

  
Teresa Giusti, Esq. (Bar No. 8006)  
Commission Prosecutor

Dated: *Sept. 22, 2022*

  
Daniel W. Patterson  
Respondent

Dated: *Sept 22, 2022*

STATE OF RHODE ISLAND  
BEFORE THE RHODE ISLAND ETHICS COMMISSION

**In re: Dan Patterson,  
Respondent**

**Complaint No. 2022-8**

**ORDER**

This matter having been heard before the Rhode Island Ethics Commission on October 18, 2022, pursuant to 520-RICR-00-00-3.16 Informal Disposition (1011), and the Commission having considered the Complaint herein, the Respondent's Answer, the arguments of the parties, and the proposed Information Resolution and Settlement, which is incorporated by reference herein, it is hereby

**ORDERED, ADJUDGED AND DECREED**

THAT, the Commission approves the Informal Resolution and Settlement as submitted;

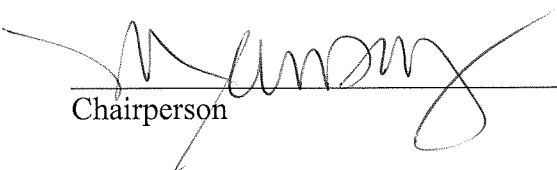
THAT, the Commission incorporates by reference herein the Findings of Fact and Admissions, and the Conclusions of Law, set forth in the Informal Resolution and Settlement;

THAT, the Respondent failed to disclose on his 2016-2021 Statements his and his spouse's ownership interests in Shanbri Farm and the annual stipend he received as a Town Council member, and on his 2017, 2019, and 2020 Statements that Shanbri Farm conducted business with the Town in excess of \$250 for each of those years;

THAT, the Respondent is ordered to pay a civil penalty in the amount of Five Hundred Dollars (\$500.00); and

THAT, the Respondent further agrees that Shanbri Farm will not sell or enter into a contract to sell any products to the Town for the duration of his tenure as a member of the Town Council, unless the contract is awarded in a manner that comports with the requirements of § 36-14-5(h).

ENTERED as an Order of this Commission,

  
Chairperson

CERTIFICATE OF SERVICE

I, Tara Olsen, hereby certify that on the 18<sup>h</sup> day of October 2022, I caused a true copy of the Order to be forwarded by first class mail, postage prepaid, to Dan Patterson, 332 South County Trail, Exeter, RI 02822 and Asa S. David III, 146 Beechwood Hill Trail, Exeter, RI 02822.

Handwritten signature of Tara Olsen in cursive script, written over a horizontal line.

Signature