



STATE OF RHODE ISLAND

RHODE ISLAND ETHICS COMMISSION

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Providence, RI 02903

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NOTICE OF OPEN MEETING

AGENDA

6th Meeting

DATE: Tuesday, June 27, 2023

TIME: 9:00 a.m.

PLACE: Rhode Island Ethics Commission
Hearing Room - 8th Floor
40 Fountain Street
Providence, RI 02903

LIVESTREAM: The Open Session portions of this meeting will be livestreamed at:
<https://us02web.zoom.us/j/83178673668>

1. Call to Order.
2. Motion to approve minutes of Open Session held on May 16, 2023.
3. Director's Report: Status report and updates regarding:
 - a.) Complaints and investigations pending;
 - b.) Advisory opinions pending;
 - c.) Access to Public Records Act requests since last meeting;
 - d.) Financial Disclosure;
 - e.) Legislative Update (2023 Senate Bill 1135);
 - f.) Ethics Administration/Office Update.
4. Election of Commission Secretary.
5. Advisory Opinions.

- a.) Jonathan Womer, who has been nominated by the Governor for appointment to the position of Director of the Rhode Island Department of Administration, requests an advisory opinion regarding whether the proposed supervisory chain of command is sufficient to insulate him from conflicts of interest arising out of his anticipated position, given that his spouse is employed by the same state agency as an analyst in the Office of Regulatory Reform. [Staff Attorney Popova Papa]
 - b.) The Honorable Michelle McGaw, a member of the Rhode Island House of Representatives, requests an advisory opinion regarding whether the Code of Ethics prohibits her from participating in General Assembly discussions and voting on proposed legislation that would limit the renewal fee for a pharmacist license to \$250 biennially, given that the Petitioner is a pharmacist who would be impacted by the legislation. [Staff Attorney Radiches]
6. Motion to go into Executive Session, to wit:
- a.) Motion to approve minutes of Executive Session held on May 16, 2023, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - b.) In re: K. Joseph Shekarchi, Complaint No. 2023-3, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - c.) In re: Frank Brown, Jr., Complaint No. 2023-4, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - d.) In re: Denise Brown, Complaint No. 2023-5, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - e.) In re: David Patten, Complaint No. 2023-6, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - f.) In re: James E. Thorsen, Complaint No. 2023-7, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
 - g.) Annual discussion and review re: Legal Counsel's contract, pursuant to R.I. Gen. Laws § 42-46-5(a)(1).
 - h.) Motion to return to Open Session.
7. Motion to seal minutes of Executive Session held on June 27, 2023.
8. Report on actions taken in Executive Session.
9. Annual discussion and potential vote re: Legal Counsel's contract.

10. New Business proposed for future Commission agendas and general comments from the Commission.
11. Motion to adjourn.

ANYONE WISHING TO ATTEND THIS MEETING WHO MAY HAVE SPECIAL NEEDS FOR ACCESS OR SERVICES SUCH AS A SIGN LANGUAGE INTERPRETER, PLEASE CONTACT THE COMMISSION BY TELEPHONE AT 222-3790, 48 HOURS IN ADVANCE OF THE SCHEDULED MEETING. THE COMMISSION ALSO MAY BE CONTACTED THROUGH RHODE ISLAND RELAY, A TELECOMMUNICATIONS RELAY SERVICE, AT 1-800-RI5-5555.

Posted on June 22, 2023

Legislative Update

STATE OF RHODE ISLAND

IN GENERAL ASSEMBLY

JANUARY SESSION, A.D. 2023

AN ACT

RELATING TO PUBLIC OFFICERS AND EMPLOYEES -- CODE OF ETHICS

Introduced By: Senator Ryan W. Pearson

Date Introduced: June 15, 2023

Referred To: Placed on Senate Calendar

It is enacted by the General Assembly as follows:

1 SECTION 1. Section 36-14-17 of the General Laws in Chapter 36-14 entitled "Code of
2 Ethics" is hereby amended to read as follows:
3 **36-14-17. Content of financial statement.**
4 (a) The financial statement required herein shall be on a form prescribed by the commission
5 and shall include the account of the financial activity of the person required to file the statement by
6 this chapter, the financial activity of his or her spouse (if not estranged), and any dependent children
7 for the preceding calendar year.
8 (b) The account of financial activity referred to in subsection (a) of this section shall consist
9 of:
10 (1) If he or she or any person enumerated in subsection (a) of this section or a business
11 entity in which he or she or any person enumerated as aforesaid held a ten percent (10%) or greater
12 equity interest or five thousand dollars (\$5,000) or greater cash value interest at any time during
13 the calendar year for which the statement is required has done business with a state or municipal
14 agency or a business which is subject to direct regulation greater than of a de minimus nature by a
15 state or municipal agency, and if so, the date and nature of the business;
16 (2) A list of all sources of occupational income identified by employer or, if self employed,
17 by the nature of occupation or profession, and if income was received from a state or municipal
18 agency, the name and address of the agency and the nature of the services rendered; however,
19 general officers, as defined in section 17-2-1, shall list all sources and amounts of income in excess

1 of two hundred dollars (\$200) according to the following categories:

- 2 (i) not more than \$1000
3 (ii) greater than \$1000 but no more than \$10,000
4 (iii) greater than \$10,000 but no more than \$25,000
5 (iv) greater than \$25,000 but no more than \$50,000
6 (v) greater than \$50,000 but no more than \$100,000
7 (vi) greater than \$100,000 but no more than \$200,000
8 (vii) greater than \$200,000 but no more than \$500,000
9 (viii) greater than \$500,000 but no more than \$1,000,000

10 (ix) greater than \$1,000,000
11 (3) A listing of all real property in which a financial interest was held; however, this section
12 shall not apply to real property used exclusively as his or her principal residence;
13 (4) Identification of any interested person from whom the person or his or her spouse (if
14 not estranged) or any dependent child received a gift or contribution of money or property in excess
15 of one hundred dollars (\$100) in value or a series of gifts or contributions of money or property,
16 the total of which exceeds one hundred dollars (\$100) in value received from the same source, and
17 a description of each gift or contributions, except those received from persons related to the person
18 at any time within the third degree of consanguinity or affinity and campaign contributions which
19 were reported as required by law, for purposes of this subsection, “interested person”, means a
20 person or a representative of a person or business that has a direct financial interest in a decision
21 that the person subject to the Code of Ethics is authorized to make, or to participate in the making
22 of, as part of his or her official duties;
23 (5) Identification of the source of all income received as beneficiary of a trust and
24 identification of each asset, if known to the beneficiary, from which income was received by the
25 beneficiary in excess of one thousand dollars (\$1,000);
26 (6) A list of all boards of directors of which the person is a member and executive positions
27 which he or she holds in any business entity, stating the name and address of each business entity;
28 (7) The name and address of any business entity in which he or she or any person
29 enumerated in subsection (a) of this section held a ten percent (10%) or greater equity interest or
30 five thousand dollars (\$5,000) or greater cash value interest in at any time during the calendar year
31 for which the statement is required; and
32 (8)(i) Identification of any person, business entity, financial institution or other
33 organization to whom the person was indebted at any time during the calendar year for which the
34 statement is required in an amount in excess of one thousand dollars (\$1,000) other than:

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1 (A) Any person related to the person at any time within the third degree of consanguinity
2 or affinity; ~~or~~
3 (B) Any transactions involving credit cards, with the exception of any and all unsatisfied
4 default judgments; or
5 (C) Any indebtedness to a financial institution, licensed and regulated by any state or by
6 the United States, which is secured solely by a mortgage of record on real property used exclusively
7 as the principal residence of the person required to file the statement.
8 (ii) This section does not require the reporting of the amount or amounts of the indebtedness
9 or the payment record of the loans.
10 (c) The financial statement shall be sworn to under oath.
11 SECTION 2. This act shall take effect on January 1, 2024.

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EXPLANATION
BY THE LEGISLATIVE COUNCIL
OF

A N A C T

RELATING TO PUBLIC OFFICERS AND EMPLOYEES -- CODE OF ETHICS

1 This act would require a public official or employee to disclose any and all unsatisfied
2 default judgments of credit card debt, in excess of one thousand dollars (\$1,000), on their financial
3 statement.

4 This act would take effect on January 1, 2024.

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LC003241
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RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: June 27, 2023

Re: Jonathan Womer

QUESTION PRESENTED:

The Petitioner, who has been nominated by the Governor for appointment to the position of Director of the Rhode Island Department of Administration, requests an advisory opinion regarding whether the proposed supervisory chain of command is sufficient to insulate him from conflicts of interest arising out of his anticipated position, given that his spouse is employed by the same state agency as an analyst in the Office of Regulatory Reform.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the proposed supervisory chain of command is sufficient to insulate the Petitioner from conflicts of interest arising out of his anticipated appointment to the position of Director of the Rhode Island Department of Administration, given that his spouse is employed by the same state agency as an analyst in the Office of Regulatory Reform.

The Petitioner has been nominated by the Governor for appointment to the position of Director of the Rhode Island Department of Administration (“DOA”). The DOA provides supportive services to all state departments and agencies.¹ Its principal responsibilities “include developing and administering the state budget; determining and maintaining standard specifications for purchases, contracts, bids, and awards for state purchases; maintaining and procuring state facilities; administering the statewide planning program; and managing the personnel of state departments and agencies.”² The DOA is comprised of a number of separate divisions and offices including the Office of Accounts and Control; the Office of Management and Budget which includes the Budget Office, the Office of Performance and Management, the Office of Internal Audit, and the Office of Regulatory Reform; the Division of Capital Asset Management and Maintenance; the Office of Employee Benefits; the Division of Human Resources; the Division of Information Technology; Legal Services; the Office of Library & Information Services; the Division of Equity, Diversity and Inclusion; the Office of Public Affairs; the Division of Purchases; State Employees Workers’ Compensation; and the Division of Statewide Planning.³

The Petitioner represents that his spouse is employed by the DOA as an analyst in the Office of Regulatory Reform (“ORR”). The Petitioner states that there are numerous layers of supervision

¹ See <https://admin.ri.gov/about-us> (last accessed on May 24, 2023).

² *Id.*

³ See <https://admin.ri.gov/divisions> (last accessed on May 24, 2023).

between the DOA Director and the ORR analyst. The Petitioner further states that, in the normal supervisory chain of command, an ORR analyst reports to the Chief of Strategic Planning, Monitoring and Evaluation in the Office of Economic and Regulatory Reform, who reports to the Deputy Director of the Office of Management and Budget (“OMB”), who in turn reports to the Director of OMB. The Director of the OMB reports to the Director of the DOA.

Cognizant of the nepotism provisions of the Code of Ethics, desirous of acting in conformity therewith, and to avoid any potential conflicts of interest regarding his spouse, the Petitioner proposes an alternate supervisory chain of command whereby, rather than reporting to the Director of the DOA on any matter involving the Petitioner’s spouse, the Director of the OMB would instead report to the Senior Advisor to the Governor. The Petitioner represents that the Senior Advisor to the Governor is a full-time employee of the Office of the Governor and is closely familiar with the functions of the DOA and the ORR, given that the DOA is a significant part of the portfolio of agencies for which the Senior Advisor serves as an intermediary between those agencies and the Governor. The Petitioner further represents that, as DOA Director, he would not have any authority or supervision over the Governor’s Senior Advisor. Given this set of facts, the Petitioner seeks guidance from the Ethics Commission regarding whether the proposed supervisory chain of command outlined herein is sufficient to insulate him from conflicts of interest arising out of his anticipated new position as the Director of the DOA, given his spouse’s employment by the DOA.

The Code of Ethics provides that a public official or employee shall not have any interest, financial or otherwise, direct or indirect, or engage in any business, employment, transaction or professional activity which is in substantial conflict with the proper discharge of his duties in the public interest. R.I. Gen. Laws § 36-14-5(a). A substantial conflict of interest exists if the public official or employee has reason to believe or expect that he or any person within his family, among others, will derive a direct monetary gain or suffer a direct monetary loss by reason of his official activity. Section 36-14-7(a). A public official or employee also may not use his public position to obtain financial gain, other than that provided by law, for himself or any person within his family, among others. Section 36-14-5(d).

Commission Regulation 520-RICR-00-00-1.3.1 Prohibited Activities - Nepotism (36-14-5004) (“Regulation 1.3.1”) contains specific provisions aimed at curbing nepotism. Pursuant to Regulation 1.3.1(B)(1), a public official or employee may not participate in any matter as part of his public duties if “any person within his [] family” is a participant or party, or if there is reason to believe that a family member will be financially impacted or will obtain an employment advantage. Additionally, Regulation 1.3.1(B)(2) prohibits a public official or employee from participating in the supervision, evaluation, appointment, classification, promotion, transfer, or discipline of any person within his family, or from delegating such tasks to a subordinate. The phrase “any person within his [] family” expressly includes “spouse.” Regulation 1.3.1(A)(2).

The Ethics Commission has consistently acknowledged that in circumstances in which a public official or employee sits atop a chain of command, a complete and effective recusal can be difficult or impossible to achieve. This is because upon the public official or employee’s recusal from matters involving a person within his family, his duties must still be carried out by one of the public official or employee’s subordinates, which could be a violation of the above-cited nepotism

provisions of the Code of Ethics. In such cases, when feasible, the Ethics Commission has approved alternate chain of command structures where the resulting decision-making is not delegated to a subordinate but, rather, rises up the chain of command or transfers laterally to a person who is not under the supervision or authority of the public official.

For example, in Advisory Opinion 2011-19, the Ethics Commission approved an alternate chain of command for the Director of the Department of Labor and Training (“DLT”), who sought guidance regarding the appropriate measures to avoid conflicts of interest, given that his first-cousin’s husband was a long-time employee of the DLT, then serving as an Assistant Director of its Division of Workers’ Compensation. In that matter, Assistant Directors reported to the Deputy Director who, in turn, reported to the petitioner. The fact that the petitioner’s cousin-in-law had been employed by the DLT for a number of years prior to the petitioner’s appointment as Director compelled the approval by the Ethics Commission of a reasonable and achievable alternate chain of command wherein the petitioner was required to recuse from any decision-making relative to the employment of his family member. Upon recusal by the petitioner, such matters were to be handled by the DLT’s Deputy Director without any input from the petitioner or, if necessary, by appropriate personnel administrators within the Department of Administration who were not under the petitioner’s authority or supervision. See also A.O. 2023-13 (approving an alternate chain of command whereby the newly appointed Chief of the Johnston Police Department was required to recuse from any matters involving his spouse, who was also employed by the Johnston Police Department, and such matters were to be ultimately reviewed by the Mayor’s Chief of Staff, whose responsibilities already included the supervision of all Department Heads); A.O. 2010-1 (approving an alternate chain of command whereby the General Treasurer of the State of Rhode Island was required to recuse from decision-making in matters impacting his family member, and his duties were transferred to and handled outside of the Office of the General Treasurer by a hearing officer employed by the Department of Administration); A.O. 2007-7 (opining that the Newport City Solicitor could act as the appointing authority, in place of the City Manager, of seven candidates for employment with the Newport Police Department, notwithstanding that the City Manager’s son was one of those candidates, provided that certain procedures were followed so that the City Manager was completely removed from all personnel decisions or matters that particularly affected his son financially). Contrast A.O. 2008-54 (opining that the son of the Saylesville Fire Chief was prohibited from being employed by the Saylesville Fire District, notwithstanding that the Fire Chief would not take part in the selection process, since no alternate chain of command was proposed to insulate the Fire Chief from apparent conflicts of interest).

Here, the Petitioner, if appointed to the position of Director of the DOA, would sit atop of the chain of command of that agency without a supervisory authority within the agency to whom he could transfer any decision-making authority over matters involving his spouse. However, it is notable that the organizational structure of the DOA is such that there are already three levels of supervision separating the Petitioner from his spouse. The Petitioner’s proposed alternate chain of command removes him from any decision-making relative to his spouse and transfers such responsibilities to the Governor’s Senior Advisor who is not a subordinate or otherwise under the supervision or authority of the Petitioner, and who is closely familiar with the functions of the DOA and the ORR.

Accordingly, in consideration of the Petitioner's representations, the applicable provisions of the Code of Ethics, and past advisory opinions issued, it is the opinion of the Ethics Commission that the proposed supervisory chain of command described by the Petitioner is reasonable and sufficient to insulate him from apparent conflicts of interest regarding matters involving his spouse's employment, such as those related to her salary, benefits, or other terms of employment, and/or such tasks relating to the supervision, evaluation, appointment, classification, promotion, transfer or discipline of the Petitioner's spouse. The Petitioner is advised, however, to remain vigilant in identifying and avoiding any conflicts of interest that might arise given his position of authority over his spouse that are not addressed herein, and is encouraged to seek further guidance from the Ethics Commission as needed.

This Draft Opinion is strictly limited to the facts stated herein and relates only to the application of the Rhode Island Code of Ethics. Under the Code of Ethics, advisory opinions are based on the representations made by, or on behalf of, a public official or employee and are not adversarial or investigative proceedings. Finally, this Commission offers no opinion on the effect that any other statute, regulation, ordinance, constitutional provision, charter provision, or canon of professional ethics may have on this situation.

Code Citations:

§ 36-14-5(a)

§ 36-14-5(d)

§ 36-14-7(a)

520-RICR-00-00-1.3.1 Prohibited Activities – Nepotism (36-14-5004)

Related Advisory Opinions:

A.O. 2023-13

A.O. 2011-19

A.O. 2010-1

A.O. 2008-54

A.O. 2007-7

Keywords:

Alternate Chain of Command

Family: Public Employment

Family: Supervision

Nepotism

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: June 27, 2023

Re: The Honorable Michelle McGaw

QUESTION PRESENTED:

The Petitioner, a member of the Rhode Island House of Representatives, a state elected position, requests an advisory opinion regarding whether the Code of Ethics prohibits her from participating in General Assembly discussions and voting on proposed legislation that would limit the renewal fee for a pharmacist license to \$250 biennially, given that the Petitioner is a pharmacist who would be impacted by the legislation.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, a member of the Rhode Island House of Representatives, a state elected position, may participate in General Assembly discussions and voting on proposed legislation that would limit the renewal fee for a pharmacist license to \$250 biennially, notwithstanding that the Petitioner is a pharmacist who would be impacted by the legislation, given that the circumstances herein justify the application of the class exception set forth in R.I. Gen. Laws § 36-14-7(b).

The Petitioner is a member of the Rhode Island House of Representatives (“House”) and has served continuously in that capacity since her initial election in 2020. She represents the people of District 71 in Portsmouth, Tiverton, and Little Compton. In her private capacity, the Petitioner is a licensed pharmacist in the State of Rhode Island. She states that one of her House colleagues introduced legislation earlier this year which provides, in pertinent part, that beginning on December 1, 2024, the renewal fee for a pharmacist license shall not be more than \$250 biennially.¹ The Petitioner represents that the legislation, if passed, would directly impact the amount that she and all other Rhode Island pharmacists would pay to renew their pharmacist license. She estimates that there are between 1,000 and 2,000 pharmacists licensed in Rhode Island. The Petitioner states that she would like to participate in General Assembly discussions and voting on the legislation, provided that her doing so would not violate the Code of Ethics.

A person subject to the Code of Ethics may not participate in any matter in which she has an interest, financial or otherwise, which is in substantial conflict with the proper discharge of her duties in the public interest. R.I. Gen. Laws § 36-14-5(a). A substantial conflict of interest occurs if a public official has reason to believe or expect that she, or any person within her family, or her

¹ The Petitioner informs that the current renewal fee for a pharmacist license is \$280 annually.

business associate, or any business by which she is employed or which she represents will derive a direct monetary gain or suffer a direct monetary loss by reason of her official activity. Section 36-14-7(a). Additionally, section 36-14-5(d) of the Code of Ethics prohibits a public official from using her position or confidential information received through her position to obtain financial gain, other than that provided by law, for herself, any person within her family, her business associate, or a business by which she is employed or which she represents.

Section 36-14-7(b) of the Code of Ethics, often referred to as the “class exception,” states that a public official will not have an interest which is in substantial conflict with the proper discharge of her official duties if any benefit or detriment accrues to her ... “as a member of a business, profession, occupation or group, or of any significant and definable class of persons within the business, profession, occupation or group, to no greater extent than any other similarly situated member of the business, profession, occupation or group, or of the significant and definable class of persons within the business, profession, occupation or group.”

When determining whether any particular circumstance justifies the application of the class exception, the Ethics Commission considers the totality of the circumstances. Among the important factors to be considered are: 1) the description of the class; 2) the size of the class; 3) the function or official action being contemplated by the public official; and 4) the nature and degree of foreseeable impact upon the class and its individual members as a result of the official action.

The Ethics Commission has previously determined that legislation that impacts all pharmacists equally would fall within the class exception. See A.O. 2004-27 (concluding that a legislator serving in the Rhode Island Senate, who in his private capacity was a pharmacist and pharmacy owner, could participate and vote on legislation that would not impact him or his business to any greater extent than any other pharmacist or pharmacy). The Ethics Commission has also previously applied the class exception in a variety of circumstances involving proposed legislation. For example, in Advisory Opinion 2023-9, the Ethics Commission concluded that a member of the Rhode Island House of Representatives could participate in the House Municipal Government and Housing Committee’s discussions and votes on proposed legislation addressing, among other things, in-the-line-of-duty disabilities and injured-on-duty benefits that would impact firefighters, notwithstanding the petitioner’s employment as a full-time firefighter in Woonsocket. The Ethics Commission based its application of the class exception on the petitioner’s representation that he would be impacted to no greater extent than any other similarly situated firefighter. See also A.O. 2022-9 (concluding that a legislator serving in the Rhode Island Senate could participate in the Senate’s discussions and decision-making relative to a budget article recommending the phase-out of state income taxation on military service pensions, notwithstanding that the petitioner was a retired naval officer receiving a military service pension); A.O. 2018-36 (concluding that a State Senator who was also a public school teacher vested in the Employees’ Retirement System of Rhode Island could participate in Senate discussions and votes regarding legislation that would provide for a stipend paid to all retired teachers or their beneficiaries during years where no cost of living adjustments were applied to teachers’ retirement benefits because, upon retirement, he would be eligible for the stipend to the same extent as every other similarly situated member of the class); A.O. 98-40 (concluding that a legislator serving in the Rhode Island House of Representatives, whose spouse was a dentist, could participate in proposed legislation to establish

an Oral Health Advocate and regulate the practice of dentistry that would impact all dentists and dental hygienists equally).

Here, the class of persons who would be affected by the proposed legislation includes all pharmacists seeking renewal of their Rhode Island license, the total number of which is estimated to be between 1,000 and 2,000. The license renewal fee would be limited to \$250 biennially for all members of the class, including the Petitioner. The Petitioner would be impacted by the legislation to no greater extent than any other individual member of the class. It is therefore the opinion of the Ethics Commission that the specific facts of this case justify the application of the class exception set forth in section 36-14-7(b) of the Code of Ethics and that the Petitioner may participate in General Assembly discussions and voting relative to the proposed legislation. However, in the event that the discussions veer into amending the proposed legislation in ways that would impact the Petitioner individually, or as a member of a much smaller class or subclass of pharmacists, the Petitioner must either recuse from participation or seek additional guidance from the Ethics Commission. In the event of a recusal, the Petitioner shall file a statement of conflict of interest consistent with the provisions of section 36-14-6.

This Draft Opinion is strictly limited to the facts stated herein and relates only to the application of the Rhode Island Code of Ethics. Under the Code of Ethics, advisory opinions are based on the representations made by, or on behalf of, a public official or employee and are not adversarial or investigative proceedings. Finally, this Commission offers no opinion on the effect that any other statute, regulation, ordinance, constitutional provision, charter provision, or canon of professional ethics may have on this situation.

Code Citations:

§ 36-14-5(a)
§ 36-14-5(d)
§ 36-14-6
§ 36-14-7(a)
§ 36-14-7(b)

Related Advisory Opinions:

A.O. 2023-9
A.O. 2022-9
A.O. 2018-36
A.O. 2004-27
A.O. 98-40

Keywords:

Class Exception