

**STATE OF RHODE ISLAND  
BEFORE THE RHODE ISLAND ETHICS COMMISSION**

**In re: Wayne Salisbury,  
Respondent**

**Complaint No. 2024-9**

**ORDER**

This matter came before the Ethics Commission on August 20, 2024, pursuant to 520-RICR-00-00-3.16 Informal Disposition (1011). The Ethics Commission considered the original Complaint, the arguments of the parties, and the proposed Informal Resolution and Settlement, and based on that review and an affirmative vote of a majority of the Commissioners, it is hereby:

ORDERED, ADJUDGED, AND DECREED:

1. The Ethics Commission approves the proposed Informal Resolution and Settlement and adopts the Findings of Fact, Conclusions of Law, and the terms of the Settlement set forth therein.

ENTERED as an Order of the Rhode Island Ethics Commission,



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Lauren E. Jones, Chair

8/23/2024

Date

**STATE OF RHODE ISLAND  
BEFORE THE RHODE ISLAND ETHICS COMMISSION**

**In re: Wayne Salisbury,  
Respondent**

**Complaint No. 2024-9**

**INFORMAL RESOLUTION AND SETTLEMENT**

The Ethics Commission Chief Prosecutor, representing the People of the State of Rhode Island, and the Respondent, Wayne Salisbury, Director of the Rhode Island Department of Corrections, hereby agree to the following Findings of Fact, Conclusions of Law, and Settlement of the above-captioned matter, subject to the approval of the Rhode Island Ethics Commission:

**I. INTRODUCTION AND TRAVEL OF THE CASE.**

The instant complaint was filed on June 10, 2024, by Richard Ferruccio against Wayne Salisbury (the Respondent) who, at that time, was serving as the Interim Director of the Rhode Island Department of Corrections.<sup>1</sup> The complaint alleges that the Respondent failed to properly disclose several instances of out-of-state travel during 2023 that were provided to him by third parties, as is required by the financial disclosure provisions of the Code of Ethics. In particular, the complaint alleges that the Respondent failed to disclose his travel to:<sup>2</sup>

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<sup>1</sup> The Respondent served as *Interim* Director of the Department of Corrections from January 13, 2023, until his confirmation as Director by the Rhode Island Senate on June 13, 2024.

<sup>2</sup> The Complaint also referred to a trip to Walt Disney World, but it did not indicate whether that trip was paid for by a third party nor did it provide any other details. For that reason, and because the investigation did not disclose any evidence that a third party paid for the Respondent to travel to Orlando, FL, this report will solely focus on the other six trips enumerated above.

1. London, England, sponsored by the British Consulate;
2. Washington, D.C., sponsored by the Correctional Leaders Association;
3. Cape Cod, MA, sponsored by the Correctional Leaders Association;
4. Norfolk, VA, sponsored by the Interstate Commission for Adult Supervision;
5. Indian Wells, CA, sponsored by the Correctional Leaders Association; and
6. Atlanta, GA, sponsored by CNA.

Pursuant to R.I. Gen. Laws § 36-14-12(c)(2), and 520-RICR-00-00-3.8 Initial Determination of Complaint (1003), the Ethics Commission made an initial determination on June 25, 2024, that the complaint alleged facts sufficient to constitute a violation of the financial disclosure mandate of the Code of Ethics. Thereafter, an investigation into the complaint's allegations was commenced.

## **II. FINDINGS OF FACT**

On March 19, 2024, at 10:51 a.m., the Respondent filed his 2023 financial disclosure statement with the Ethics Commission via the Commission's online filing portal. Among the categories of required information on the statement is one entitled "Out-of-State Travel." That category instructs the filer to disclose whether any person or entity other than his or her employer provided the filer with out-of-state travel valued at over \$250, inclusive of all related expenses such as transportation, lodging, meals, and entertainment, *if* such travel would not have been provided but for the fact that the filer held a public office or position. 520-RICR-00-00-4.12 Out-of-State Travel (36-14-17009).

The Respondent did not enter any information relating to out-of-state travel while completing his 2023 statement online, but he instead clicked a box indicating, "Not

Applicable (This question does not apply to me).” Thereafter, his response to this category read, “Not Applicable.” In order to complete his online filing, the Respondent added a digital signature and checked a box entitled “Certification/Affidavit” that read:

I certify under penalty of perjury, that this Financial Statement is a complete and accurate response to the questions presented as to the financial information and interests of myself, my spouse, and my dependent children. I understand that a failure to provide complete and accurate responses to each question is a violation of the law that may result in the imposition of substantial penalties, including fines. I understand that I am subject to the statutory and regulatory provisions of the Rhode Island Code of Ethics (available at [www.ethics.ri.gov](http://www.ethics.ri.gov) or by contacting the Ethics Commission) and that I may seek assistance and guidance from the Ethics Commission as to any issues or questions I have relative to my conduct under the Code of Ethics or as to the information that must be disclosed on this Financial Statement.

On June 4, 2024, a reporter from WPRI.com sent the Department of Corrections questions pertaining to the Respondent’s out-of-state travel in 2023. The following day, on June 5, 2024, the Respondent filed an amendment to his 2023 statement to add six instances of out-of-state travel, including trips to London, England; Washington DC; Cape Cod, MA; Norfolk, VA; Indian Wells, CA; and Atlanta, GA:

Family Member Name	Name of Person or Business Entity	Address of Person or Business Entity	Travel Destination and Purpose	Description of Travel Expenses	Actual Cost	Filed On
Self	British Consulate	1001 Brickell Bay Drive, Miami, FL 33131	London England - traveled by invitation to London for a British consulate sponsored visit along with a delegation that included senior representatives from the corrections departments of Massachusetts, Connecticut, and Georgia as well as from the United States Department of Justice. The trip was paid in full by the British Consulate. Their extensive agenda included a tour of His Majesty's Prison Wandsworth, and meetings with the Governor of Wandsworth prison in London along with her reparation and settlement team, the United Kingdom's Ministry of Justice and the Foreign Commonwealth and Development Office to review similarities between correctional systems and discuss challenges and shared best practices related to community reentry.	Hotel, airfare, ground transportation	Unknown	06/05/20 24 at 02:27PM
Self	Correctional Leaders Association	PO Box 102, Iona, ID 83427	Washington DC - Directors and Commissioners Conference along with meetings with RI's Congressional Delegation	Hotel, Airfare, ground transportation	633.80 (633.80 reimbursed to the state)	06/05/20 24 at 02:27PM
Self	Correctional Leaders Association	PO Box 102, Iona, ID 83427	Cape Cod - Northeast Region Directors and Commissioners Meeting	Hotel, meals	1518.47 (1318.47 reimbursed to the state)	06/05/20 24 at 02:27PM
Self	Interstate Commission for Adult Supervision	3070 Lakecrest Circle, Lexington, KY 40513	Norfolk VA - Commissioner for the State of RI on Interstate Compact and Adult Supervision Annual Meeting	Flight, meals, hotel	953.09 (645.52 reimbursed to the state)	06/05/20 24 at 02:27PM
Self	Correctional Leaders Association	PO Box 102, Iona, ID 83427	Indian Wells CA - New Directors Training for Directors and Commissioners	Meals, hotel, airfare, and ground transportation	2349.37 (1719.68 reimbursed to the state)	06/05/20 24 at 02:27PM
Self	CNA	3003 Washington Boulevard, Arlington, VA 22201	Atlanta GA - National Summit to Advance States Criminal Justice Priorities	Hotel, airfare, ground transportation, meals	727.03 (658.60 reimbursed to the agency)	06/05/20 24 at 02:27PM

The above amendments indicated that costs for trips 2-6 were “reimbursed to the state” or “reimbursed to the agency,” a phrase that has been explained by the Respondent to mean that some or all costs associated with the travel were initially paid for by the Department of Corrections and/or the State of Rhode Island (the state), which then received full or partial reimbursement from a third-party entity. The amendment indicated that as to trip 1 to London, England, all travel costs were directly paid for by the British Consulate, although those costs were listed as “Unknown” at the time of filing the amendment.

The instant Complaint was filed on June 10, 2024, by Richard Ferruccio, who is the President of the Rhode Island Brotherhood of Correctional Officers, a group that opposed the Respondent’s appointment as Director of Department of Corrections and his Senate confirmation that occurred on June 13, 2024. On June 17, 2024, the Respondent amended his financial disclosure statement a second time to provide additional information regarding his trip to London, England, disclosing that the cost of this travel was \$3,900.20.

Family Member Name	Name of Person or Business Entity	Address of Person or Business Entity	Travel Destination and Purpose	Description of Travel Expenses	Actual Cost	Filed On
Self	British Consulate (Cost update only)	1001 Brickell Bay Drive, Miami, FL 33131	London England - traveled by invitation to London for a British consulate sponsored visit along with a delegation that included senior representatives from the corrections departments of Massachusetts, Connecticut, and Georgia as well as from the United States Department of Justice. The trip was paid in full by the British Consulate. Their extensive agenda included a tour of His Majesty’s Prison Wandsworth, and meetings with the Governor of Wandsworth prison in London along with her reparation and settlement team, the United Kingdom’s Ministry of Justice and the Foreign Commonwealth and Development Office to review similarities between correctional systems and discuss challenges and shared best practices related to community reentry.	Hotel, Airfare, ground transportation	3900.20	06/17/20 24 at 07:33PM

During an introductory telephone call that day from the Commission’s Chief Investigator, the Respondent was advised to carefully review his entire 2023 financial disclosure

statement to determine if any other categories had required information omitted, particular the “Family Income Sources” category that Respondent had marked as “Not Applicable.”

The following day, on June 18, 2024, the Respondent filed a third amendment to his financial disclosure statement to add two disclosures to the “Family Income Sources” category on his statement. Therein, he disclosed jobs from which he and his spouse each received \$1,000 or more in gross income:<sup>3</sup>

Family Member Name	Self Employed ?	Business or Employer Name	Title/Occupation and Date of Employment	Address of Business	Services Rendered ?	Date & Nature of Services	Filed On
Self	No	RI Department of Corrections	Acting Director	40 Howard Ave, Cranston, RI 02893, United States	No	-	06/18/2024 at 10:15AM
Self	No	Travelers Insurance Company	Forensic Accountant	Tower Square, One, Hartford, CT 06183, USA	No	-	06/18/2024 at 10:15AM

The Respondent agreed to meet at the Ethics Commission office on June 26, 2024, to review his entire 2023 financial disclosure statement. This led to his filing a fourth amendment later that day, disclosing under the “Family Income Sources” category that he also received over \$1,000 in income for serving as a consultant to the Crime and Justice Institute.

Self	No	Crime & Justice Institute	Consultant	355 Boylston Street, Boston, MA 02116, USA	No	Consultant	06/26/2024 at 04:33PM
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This amendment also added seven entities to which he or his spouse were indebted in an amount exceeding \$1,000.

<sup>3</sup> The second entry in this category disclosing work as a Forensic Accountant for Travelers Insurance Company was meant to apply to the Respondent’s spouse, although in the first column it mistakenly refers to “Self.” The Respondent made this clarification in a subsequent amendment on June 26, 2024.

Debtor Name	Lender/Creditor Name	Lender/Creditor Address	Filed On
Self	American Honda Finance	600 Kelly Way, Holyoke, MA 01040	06/26/2024 at 04:33PM
Self	Hyundai Capitol America	4000 MacArthur Blvd Suite, Newport Beach, CA 92660	06/26/2024 at 04:33PM
Self	Merrimack Valley Credit Union	500 Merrimack Street, Lawrence, MA 01843	06/26/2024 at 04:33PM
Self	Veridan Credit Union	1827 Ansborough Ave, Waterloo, IA 50701	06/26/2024 at 04:33PM
Self	Fifth Third Bank	5050 Kingsley Drive, Cincinnati, OH 45227	06/26/2024 at 04:33PM
Self	M&T Bank	1 Fountain Plaza Fl 4, Buffalo, NY 14203	06/26/2024 at 04:33PM
Tammy Salisbury	Aid Vantage	PO Box 4450, Portland, OR 97208	06/26/2024 at 04:33PM

At the June 26, 2024 meeting between the Respondent and the prosecution team, the Respondent provided documentation to address each of the six out-of-state trips and their circumstances, including whether and to what extent expenses for each trip were paid for or reimbursed by a third party. These trips and related expenses are summarized below.

1. **London, England**. Information and documents provided by the Respondent indicate that the Respondent traveled to London, England from February 25, 2023 to March 5, 2023, at the expense of the British Consulate, to tour a prison and meet with corrections officials to discuss London's prison system and its post-release supervision and rehabilitation systems. The British Consulate paid directly for most expenses related to this 2023 trip, which included a total of \$3,900.20 for the Respondent's airfare, hotel, and airport transfers. Documents provided by the Respondent also indicate that the British Consulate provided the Respondent with two meals during his stay.

Based on the above, the Respondent was required to disclose the British Consulate's payments for this travel on his 2023 financial disclosure statement.

2. **Washington, DC.** Information and documents provided by the Respondent indicate that the Respondent traveled to Washington, DC. from June 12, 2023 to June 16, 2023, to attend the Correctional Leaders Association's (CLA) "on the Hill" Conference. On the Respondent's Critical Expense Request Form filed with the state prior to the trip, the Respondent noted that while the state would initially pay for airfare, these costs would be reimbursed by the CLA. Consistent therewith, the state initially paid for the Respondent's airfare, at a cost of \$469.80. Following the trip the Respondent requested and received a reimbursement check, dated June 30, 2023, from the CLA, payable to the Respondent in the amount of \$654.77. Then, on or about July 13, 2024, the Respondent wrote a personal check to the state in the amount of \$469.80. The Respondent indicated that the difference of \$184.97 between the \$654.77 that he received from the CLA and his \$469.80 reimbursement to the state was due to his entitlement to reimbursement directly from the CLA for a \$20.97 Uber ride and "per diem" expenses totaling \$164.<sup>4</sup> Documents provided by the Respondent also indicate that his four-night hotel stay was paid for directly by the CLA at a total cost of \$1,479.52 and that the CLA also paid for some of the Respondent's meals and receptions at an unknown cost.

Based on the above, the CLA indirectly provided for \$469.80, and directly provided for at least \$1,664.49, of the Respondent's travel expenses for this trip.

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<sup>4</sup> The term "per diem" in this context generally refers to a daily stipend designated to cover expenses incurred by employees during business travel.



Accordingly, the Respondent was required to disclose the CLA's payments for this travel on his 2023 financial disclosure statement.

3. **Cape Cod, MA.** Information and documents provided by the Respondent indicate that the Respondent drove to and attended the CLA Northeast Region Meeting in Cape Cod (Brewster), MA from September 11, 2023 to September 14, 2023, for which the state initially paid \$1,518.47 for the Respondent's three-night stay at a hotel, plus \$200 in per diem reimbursements. The Respondent understood that the CLA would provide reimbursement for hotel costs, and one week after the trip he requested and received a reimbursement check from CLA in the amount of \$1,318.47, payable to directly to the Respondent. The Respondent then made a reimbursement to the State of Rhode Island with a personal check in that same amount of \$1,318.47. Documents provided by the Respondent indicate that the CLA provided the Respondent with several of his meals and two evening receptions during his attendance at an unknown cost.

Based on the above, the CLA indirectly provided for \$1,318.47 of the Respondent's expenses for this trip, and it directly paid for several of the Respondent's meals at an unknown cost. Accordingly, the Respondent was required to disclose the CLA's payments for this travel on his 2023 financial disclosure statement.

4. **Norfolk, VA.** Information and documents provided by the Respondent indicate that the Respondent attended the 2023 Annual Business Meeting of the Interstate Commission for Adult Offender Supervision (ICAOS) in Norfolk, VA from

September 18, 2023 to September 21, 2023. The Respondent understood that the ICAOS would provide reimbursement for travel-related expenses. The state initially paid a total of \$953.09 for the Respondent's airfare (\$331.96), lodging (\$442.91), and car rental (\$178.22). The Respondent sought and received a total of \$882.02 in reimbursements from ICAOS. Then, by a personal check dated October 18, 2023, the Respondent reimbursed the state in the amount of \$645.52, which is \$236.50 less than the reimbursement he received from ICAOS. The Respondent claims that he utilized the \$236.50 balance from ICAOS to reimburse himself for expenses relating to per diem reimbursements of \$206.50 for four days and a \$30 baggage fee from Southwest Airlines (a receipt for which was provided by Respondent). Documents provided by the Respondent indicate that the ICAOS hosted an evening reception aboard the USS Wisconsin Battleship at an unknown expense.

Based on the above, the ICAOS indirectly provided for \$645.52, and directly provided for at least \$236.50, of the Respondent's expenses for this trip. Accordingly, the Respondent was required to disclose the ICAOS's payments for this travel on his 2023 financial disclosure statement.

5. **Indian Wells, CA.** Information and documents provided by the Respondent indicate that the Respondent attended the CLA's New Directors Training and All Directors Symposium in Indian Wells, CA from November 13, 2023 to November 17, 2023. The Respondent understood that the CLA would provide reimbursement for travel-related expenses. The state initially paid a total of \$2,349.37 for the Respondent's airfare (\$584.41), hotel (\$1,219.68), car rental (\$295.28), and per diem expenses

(\$250). The Respondent sought and received a total of \$1,719.68 in reimbursements directly from the CLA, and he then reimbursed the state by personal check in that same amount. Documents provided by the Respondent indicate that the CLA also provided meals to all attendees throughout the event at an unknown cost.

Based on the above, the CLA indirectly provided for \$1,719.68 in expenses for this trip. Accordingly, the Respondent was required to disclose the CLA's payments for this travel on his 2023 financial disclosure statement.

6. **Atlanta, GA.** Information and documents provided by the Respondent indicate that the Respondent attended the National Summit to Advance States' Criminal Justice Priorities in Atlanta, GA from December 4, 2023 to December 7, 2023. The Summit was organized by six private organizations: the Crime and Justice Institute (CJI), the Council of State Governments Justice Center, the Center for Naval Analyses (CNA), The Pew Charitable Trusts, Arnold Ventures, and the Bureau of Justice Assistance. Because the Respondent has identified CNA in his amendments as the entity providing the travel, this document will also refer to CNA to represent all six organizations collectively.

The Respondent understood that CNA would provide reimbursement for travel-related expenses. The state initially paid a total of \$727.03 for the Respondent's travel to Atlanta for airfare (\$498.60), car rental (\$138.43), and parking (\$90.00). The Respondent sought and received reimbursement from CNA in the amount of \$843.60, then he wrote a personal check to the state for the amount of \$658.60. The difference between the \$843.60 he received from CNA and the \$658.60

he paid to the state represents a per diem reimbursement of \$155 directly from CNA. Additionally, CNA directly paid for the Respondent's hotel, in the amount of \$586.64.

Based on the above, CNA indirectly provided for \$658.60, and directly provided for \$741.64, of the Respondent's expenses for this trip. Accordingly, the Respondent was required to disclose CNA's payments for this travel on his 2023 financial disclosure statement.

### **III. CONCLUSIONS OF LAW**

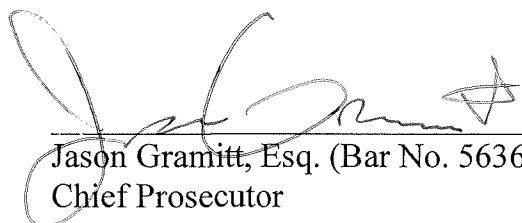
1. As the Interim Director of the Rhode Island Department of Corrections throughout most of 2023, the Respondent was a state appointed official and employee holding a major decision-making position in a state agency who was required to file an annual financial disclosure statement with the Ethics Commission pursuant to R.I. Gen. Laws § 36-14-16(a)(3).
2. By failing to disclose the required details of his 2023 out-of-state travel to London, England; Washington DC; Brewster, MA; Norfolk, VA; Indian Wells, CA; and Atlanta, GA, on his financial statements for calendar year 2023, the Respondent violated 520-RICR-00-00-4.12 Out-of-State Travel (36-14-17009).

### **IV. SETTLEMENT**

This settlement recognizes the Respondent's full cooperation with the investigation, including his willingness to voluntarily provide extensive documentation concerning expenses relating to his out-of-state travel. It also recognizes the Respondent's willingness to immediately correct any omissions on his financial statement, and his acceptance of responsibility for those omissions. Finally, and significantly, the settlement acknowledges that the investigation did not uncover any evidence that the Respondent misappropriated or improperly received any reimbursement funds from the state or a third party.

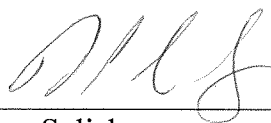
Pursuant to the above Findings of Fact and Conclusions of Law, the parties hereby agree, subject to the approval of the Ethics Commission, pursuant to section 36-14-13(d) and Commission Regulation 520-RICR-00-00-3.16 Informal Disposition (1011), to the following:

1. The Ethics Commission shall enter an Order and Judgment adopting the Findings of Fact, Conclusions of Law, and the terms of the Settlement herein.
2. The Respondent agrees that the Ethics Commission will impose, and the Respondent agrees to pay, a civil penalty in the amount of \$200.
3. The above terms represent a full and complete resolution and settlement of Complaint No. 2024-9 and of any financial disclosure omissions referenced herein.

  
Jason Gramitt, Esq. (Bar No. 5636)  
Chief Prosecutor

Dated:

8/20/24

  
Wayne Salisbury  
Respondent

Dated:

8/20/24