

RHODE ISLAND ETHICS COMMISSION

Advisory Opinion. 2025-42

Approved: July 1, 2025

Re: Robert Runge

QUESTION PRESENTED:

The Petitioner, the grants administrator and unhoused coordinator for the City of Pawtucket, a municipal employee position, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from accepting an appointment to the board of directors of the Blackstone Valley Advocacy Center, a private domestic violence center, given that the center applies for and receives Emergency Solutions Grants funding from the City of Pawtucket.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, the grants administrator and unhoused coordinator for the City of Pawtucket, a municipal employee position, is not prohibited by the Code of Ethics from accepting an appointment to the board of directors of the Blackstone Valley Advocacy Center, a private domestic violence center, notwithstanding that the center seeks and receives Emergency Solutions Grants funding from the City of Pawtucket.

The Petitioner is employed by the City of Pawtucket as its grants administrator and unhoused coordinator within the city's Department of Planning and Development. He represents that his duties include the oversight of various grant programs, with the exception of the Community Development Block Grants (CDBG), the HOME Housing funds, and the Emergency Solutions Grants (ESG), which are overseen by the CDBG manager. The Petitioner adds that he is also responsible for the unhoused individuals inhabiting an encampment in the city. The Petitioner represents that his working hours are as follows:

Monday - Wednesday, 8:00 a.m. to 4:30 p.m.;
Thursday, 8:00 a.m. to 6:00 p.m.; and
Friday, 8:00 a.m. to 12:30 p.m.

The Petitioner states that he was offered an appointment to the board of directors of the Blackstone Valley Advocacy Center (the center), a private domestic violence center. The

center's mission is "to provide comprehensive services to victims of domestic and sexual violence and prevention education to the community at large."¹ The Petitioner represents that the center applies for and receives ESG funds from Pawtucket. The Petitioner further represents that, although the ESG funds are administered by the Department of Planning and Development, he does not participate in the establishment of the criteria for those funds, does not review the ESG applications, and does not select the applicants to receive such funds. He explains that the criteria for the ESG applications are established by the United States Department of Housing and Urban Development. He adds that the applications are reviewed by the CDBG manager for compliance and are then forwarded to the mayor for review. The mayor then selects the applicants who are to receive funding and determines the amount to be awarded to each successful applicant. The Petitioner states that he does not oversee the CDBG manager, or vice versa, and their positions are lateral to each other. The Petitioner notes that he reports directly to the deputy director of Commerce, who in turn reports to the director of Commerce. Given this set of facts, the Petitioner seeks guidance regarding whether he may accept the appointment to the center's board of directors.

Under the Code of Ethics, a public official or employee shall not have an interest 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 a public official or employee has reason to believe or expect that he, any person within his family, his business associate, or any business by which he is employed or which he represents will derive a direct monetary gain or suffer a direct monetary loss by reason of his official activity. R.I. Gen. Laws § 36-14-7(a). Further, the Code of Ethics prohibits a public official or employee from accepting other employment which will either impair his independence of judgment or induce him to disclose confidential information acquired by him in the course of and by reason of his official duties. § 36-14-5(b).

The Code of Ethics also provides that a public official or employee may not use his office to obtain financial gain for himself, any person within his family, his business associate, or any business by which he is employed or which he represents. § 36-14-5(d). A public official or employee may not represent himself or any other person, or act as an expert witness before any municipal agency of which he is a member or by which he is employed. § 36-14-5(e)(1)-(3). Furthermore, a public official or employee must recuse himself from participation when his business associate, or any person authorized by his business associate to appear on behalf of the business associate, appears or presents evidence or arguments before the public official or employee's municipal agency. 520-RICR-00-00-1.2.1(A)(2) & (3) Additional Circumstances Warranting Recusal (36-14-5002).

¹ [About Us | Blackstone Valley Advocacy Center](#) (last visited June 24, 2025).

A business associate is defined as “a person joined together with another person to achieve a common financial objective.” R.I. Gen. Laws § 36-14-2(3). A person is defined as “an individual or a business entity.” § 36-14-2(7).

The Ethics Commission has consistently concluded that persons are “business associates” of the entities, including non-profit organizations, for which they serve as either officers or members of a board of directors, or in some other leadership position that permits them to direct and affect the financial objectives of an organization. See, e.g., A.O. 2021-6 (opining that a member of the North Smithfield Planning Board was a business associate of the North Smithfield Heritage Association, a private non-profit organization of which he served as a member of the board of directors and as its president and, therefore, was required to recuse from participating in planning board matters when the heritage association appeared or presented evidence or arguments); A.O. 2014-14 (opining that the director of the Rhode Island Department of Environmental Management (DEM), who was also a director of the Rhode Island Boy Scouts (Boy Scouts), was a business associate of the Boy Scouts and was, thus, required to recuse from participating in any DEM decisions that would financially impact the Boy Scouts, as well as from any matters in which a Boy Scout representative appeared to represent the organization’s interests). Accordingly, in the instant matter, the Petitioner would become a business associate of the center.

None of the above provisions of the Code of Ethics prohibit the Petitioner’s simultaneous service as grants administrator and unhoused coordinator for the City of Pawtucket and as a member of the board of directors of the Blackstone Valley Advocacy Center. See A.O. 2019-44 (opining that the Secretary of Commerce for the State of Rhode Island, who by statute also served as the chief executive officer for the Rhode Island Commerce Corporation, was not prohibited by the Code of Ethics from simultaneously serving as a member of the board of directors of the Rhode Island Chapter of the American Red Cross); A.O. 2019-31 (opining that the administrator of operations management for the Department of Administration, Division of Information Technology, was not prohibited by the Code of Ethics from serving as a member of the board of directors for the Greenwood Credit Union); and A.O. 2017-29 (opining that a member of the Providence Historic District Commission was not prohibited by the Code of Ethics from simultaneously serving as a member of the board of directors of the Providence Preservation Society). Additionally, based on the facts as represented, there is no indication that serving as a member of the board of directors of the center would impair the Petitioner’s independence of judgment in his public capacity.

However, such simultaneous public and private service requires the Petitioner to remain vigilant in identifying and managing any conflicts of interest that may arise between his public and private duties. Specifically, the Code of Ethics would prohibit him from sharing any confidential information with the center, or from representing the center’s interests before the city’s Department of Planning and Development. Furthermore, the Petitioner would be required to recuse from participating in his public capacity in discussions or

decision-making, if any, that financially impact the center, as well as from any matters in which representatives of the center appear or present evidence or arguments before the Petitioner on behalf of the center.

For all of these reasons, it is the opinion of the Ethics Commission that the Petitioner is not prohibited by the Code of Ethics from serving as a member of the board of directors of the Blackstone Valley Advocacy Center, provided that he remains vigilant in identifying and managing any conflicts of interest that may arise between his public and private duties. Recusals, if any, must be consistent with the provisions of R.I. Gen. Laws § 36-14-6. The Petitioner is advised to seek further guidance from the Ethics Commission when faced with a specific situation not covered by this general advisory opinion.

This Advisory 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, agency policy, ordinance, constitutional provision, charter provision, or canon of judicial or professional ethics may have on this situation.

Code Citations:

§ 36-14-2(3)

§ 36-14-2(7)

§ 36-14-5(a)

§ 36-14-5(b)

§ 36-14-5(d)

§ 36-14-5(e)

§ 36-14-6

§ 36-14-7(a)

520-RICR-00-00-1.2.1 Additional Circumstances Warranting Recusal (36-14-5002)

Related Advisory Opinions:

A.O. 2021-6

A.O. 2019-44

A.O. 2019-31

A.O. 2017-29

A.O. 2014-14

Keywords:

Business associate

Non-profit boards