

**STATE OF RHODE ISLAND  
RHODE ISLAND ETHICS COMMISSION**

**In re: Robert L. Lombardo,  
Respondent**

**Complaint Nos. 2025-3 & 2025-5**

**ORDER**

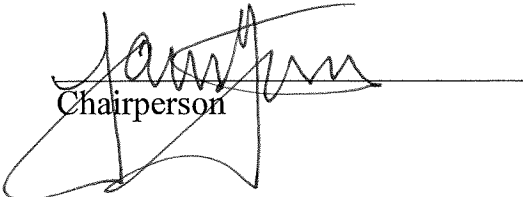
This matter having been heard before the Rhode Island Ethics Commission on August 19, 2025, pursuant to 520-RICR-00-00-3.16 Informal Disposition (1011), and the Commission having considered the Complaint herein, the arguments of counsel, and the proposed Informal Resolution and Settlement, which is incorporated by reference herein, it is hereby

**ORDERED, ADJUDGED AND DECREED**

THAT:

1. The Commission approves the Informal Resolution and Settlement; and
2. 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; and
3. By representing another person before the Westerly Planning Board on April 15, 2025, prior to the expiration of one year following his severance from his position as a Westerly Town Council member, the Respondent violated R.I. Gen. Laws § 36-14-5(e)(4); and
4. By representing another person before the Westerly Board of Canvassers on June 11, 2025, prior to the expiration of one year following his severance from his position as a Westerly Town Council member, the Respondent violated R.I. Gen. Laws § 36-14-5(e)(4); and
5. The Respondent is ordered to pay a civil penalty in the amount of Five Hundred Dollars (\$500).

Entered as an Order of this Commission,

A handwritten signature in black ink, appearing to be "Janet", written over a horizontal line. The signature is stylized and somewhat illegible.

Chairperson

Dated: August 19, 2025

**STATE OF RHODE ISLAND  
RHODE ISLAND ETHICS COMMISSION**

**In re: Robert L. Lombardo,  
Respondent**

**Complaint Nos. 2025-3 & 2025-5**

**INFORMAL RESOLUTION AND SETTLEMENT**

The Respondent, Robert L. Lombardo, and the Ethics Commission Prosecutor, representing the People of the State of Rhode Island, hereby agree to a resolution of the above-referenced matters as follows, subject to the approval of the Rhode Island Ethics Commission:

**I. FINDINGS OF FACT AND ADMISSIONS**

1. The Respondent is a former member of the Westerly Town Council, having served from August 2023 through November 2024 when he lost his bid for re-election.<sup>1</sup>
2. In his private capacity, the Respondent is, and has been, a licensed and practicing attorney and member of the Rhode Island Bar since 2010.<sup>2</sup>
3. At the Westerly Town Council's August 5, 2024, meeting, Attorney Steven Surdut presented a petition for road abandonment on behalf of Richard and Margaret Caster.<sup>3</sup> The Town Council voted to refer the petition to the Westerly Planning Board for

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<sup>1</sup> The Respondent, the unelected candidate who received the highest number of votes, was offered to fill the vacancy created when a former Council member resigned in August 2023.

<sup>2</sup> The Respondent has been a member of the Maryland Bar since 1995 and the District of Columbia Bar since 1997.

<sup>3</sup> Margaret Caster was the Complainant for Complaint No. 2025-5.

its review.<sup>4</sup>

4. On April 15, 2025, five months after leaving office, the Respondent appeared in his private capacity before the Planning Board, the members of which are appointed by the Town Council, to represent a neighbor who opposed the petition for road abandonment.

5. In a separate matter, in May 2025, a citizen of the town filed with the Westerly Board of Canvassers a Declaration of Intent to Recall Town Council President Christopher Duhamel.

6. On June 11, 2025, seven months after leaving office, the Respondent, in his capacity as Christopher Duhamel's attorney, signed and filed a verified complaint with the Board of Canvassers, the members of which are appointed by the Town Council, seeking to invalidate the Declaration of Intent to Recall and end the recall process.

7. Also on June 11, 2025, the Respondent appeared before the Board of Canvassers on behalf of Christopher Duhamel and presented arguments in support of the verified complaint to end the recall process.

8. On June 13, 2025, the Respondent contacted the Ethics Commission for guidance and spoke with an investigator who informed him that the Code of Ethics prohibits a public official from representing another person before any agency for which he is the appointing authority, for a period of one year after he has officially severed his position with the appointing agency.

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<sup>4</sup> The Respondent recused from the vote and filed a recusal form with the Ethics Commission on which he noted that he represented the petitioners' neighbor.

9. Also on June 13, 2025, after speaking with the Commission investigator, the Respondent immediately filed a Notice of Withdrawal with the Board of Canvassers, withdrawing from representing Christopher Duhamel and stating that he would not participate in the presentation of evidence or arguments on Mr. Duhamel's behalf before the Board.

10. Complaint No. 2025-3 and Complaint No. 2025-5 were filed with the Ethics Commission on June 18, 2025, and July 10, 2025, respectively.

11. On July 24, 2025, the Respondent presented to the Commission's office in the interest of resolving the instant matters. He represented to the Prosecution that because he appeared and argued during a period of public comment before the Planning Board and the Board of Canvassers, respectively, he believed at the time that the Code of Ethics did not prohibit him from doing so.

12. The Respondent agrees that he will not represent any person before the Westerly Town Council or any agency for which the Council is the appointing authority until the expiration of one year following his severance from the Town Council.

## **II. CONCLUSIONS OF LAW**

1. As a former municipal elected official who left office in November 2024, the Respondent was and is subject to the Rhode Island Code of Ethics in Government, pursuant to Rhode General Laws § 36-14-4(1).

2. The Respondent's appearance before the Westerly Planning Board on April 15, 2025, constituted the representation of another person before a municipal agency over

which the Town Council has appointing authority, pursuant to 520-RICR-00-00-1.1.4(A)(2)(a) & (c) Representing Oneself or Others, Defined (36-14-5016).

3. By representing another person before the Westerly Planning Board on April 15, 2025, prior to the expiration of one year following his severance from his position as a Westerly Town Council member, the Respondent violated R.I. Gen. Laws § 36-14-5(e)(4).

4. The Respondent's appearance before the Westerly Board of Canvassers on June 11, 2025, constituted the representation of another person before a municipal agency over which the Town Council has appointing authority pursuant to 520-RICR-00-00-1.1.4(A)(2)(a) & (c) Representing Oneself or Others, Defined (36-14-5016).

5. By representing another person before the Westerly Board of Canvassers on June 11, 2025, prior to the expiration of one year following his severance from his position as a Westerly Town Council member, the Respondent violated R.I. Gen. Laws § 36-14-5(e)(4).

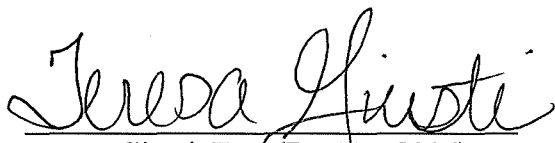
### **III. SETTLEMENT**

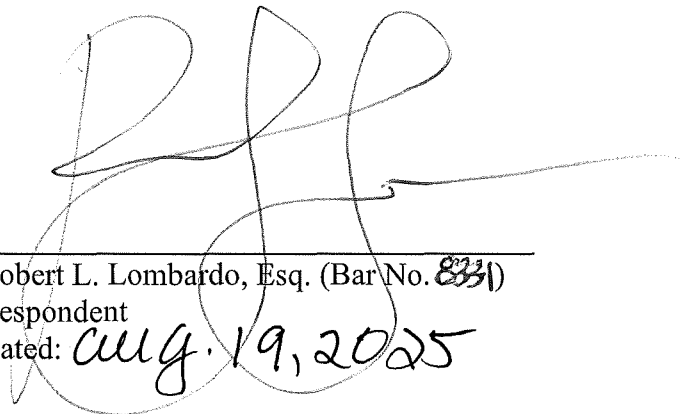
Pursuant to the above Findings of Fact and Conclusions of Law, the parties hereby agree, subject to the approval of the Commission, to the following, pursuant to R.I. Gen. Laws § 36-14-13(d) and 520-RICR-00-00-3.16 Informal Disposition (1011):

1. The Commission shall enter an Order and Judgment adopting the Findings of Fact, Conclusions of Law, and terms of the Settlement herein.

2. The Respondent agrees that the Prosecution will recommend the imposition of a civil penalty in the amount of Five Hundred Dollars (\$500.00). The Respondent agrees to the payment of said civil penalty.

3. The above terms represent the full and complete Informal Resolution and Settlement for Complaint Nos. 2025-3 & 2025-5.

  
Teresa Giusti, Esq. (Bar No. 8006)  
Commission Prosecutor  
Dated: *aug. 19, 2025*

  
Robert L. Lombardo, Esq. (Bar No. ~~8331~~)  
Respondent  
Dated: *aug. 19, 2025*