



STATE OF RHODE ISLAND  
**RHODE ISLAND ETHICS COMMISSION**  
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**NOTICE OF OPEN MEETING**

<b>DATE:</b>	Tuesday, September 30, 2025
<b>TIME:</b>	9:00 a.m.
<b>PLACE:</b>	Rhode Island Ethics Commission Hearing Room – 8 <sup>th</sup> Floor 40 Fountain Street Providence, RI 02903
<b>LIVESTREAM:</b>	<p>The Open Session portions of this meeting will be livestreamed at: <a href="https://us02web.zoom.us/j/86352518425">https://us02web.zoom.us/j/86352518425</a></p> <p><b>This is an in-person meeting held at the physical location listed above. Livestream access is being provided only as a convenience, but it is not an official meeting place and we do not guarantee virtual access to view or participate in the meeting. If the livestream virtual broadcast of the meeting is interrupted or cut off for any reason, the meeting will continue in person.</b></p>



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### **AGENDA**

1. Call to Order.
2. Motion to approve minutes of Open Session held on September 9, 2025.
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; and
  - e.) General office administration;
4. Advisory Opinions:
  - a.) The Honorable Jason Knight, a legislator serving as a member of the Rhode Island House of Representatives, who in his private capacity is a criminal defense attorney licensed to practice in Rhode Island and Massachusetts, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from seeking re-certification to the list of court-appointed attorneys available to represent indigent clients in criminal matters before the Rhode Island courts. [Executive Director Gramitt]
  - b.) Sonia Frias, an environmental scientist with the Rhode Island Department of Health, Center for Drinking Water Quality, requests an advisory opinion regarding whether she is prohibited by the Code of Ethics from serving in her private capacity as a co-author for a paper intended to be published in a scientific journal which incorporates the use of data that the Petitioner compiled as part of her public duties and later requested and received in her private capacity through the state's Access to Public Records Act. [Staff Attorney Radiches]

- c.) William J. DePasquale Jr., AICP, the town planner for the Town of Exeter, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from performing his public duties relative to an application by the town's assistant clerk in her private capacity for the subdivision of a parcel of land that she owns in the town. [Staff Attorney Radiches]

5. Motion to go into Executive Session, to wit:

- a.) Motion to approve minutes of Executive Session held on September 9, 2025, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- b.) In re: John M. Hoyle, Jr., Complaint No. NF2025-1, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- c.) In re: Jonathan Pascua, Complaint No. 2025-2, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- d.) Motion to return to Open Session.

6. Motion to seal minutes of Executive Session held on September 30, 2025.

7. Report on actions taken in Executive Session.

8. Discussion and Vote on proposed regulatory amendments to the Code of Ethics' gift rule at 520-RICR-00-00-1.4.2, pursuant to R.I. Gen. Laws § 36-14-9:

- a.) As to Gift Limits: The Code of Ethics' gift rule has, since 2005, prohibited gifts from interested persons to public officials that are valued in excess of \$25 per gift or \$75 in aggregate from the same source. This proposed amendment to subsection (B) of 520-RICR-00-00-1.4.2 raises those limits to \$50 per gift or \$150 in aggregate to acknowledge increases in inflation over the last twenty years and moving forward.

The Ethics Commission's Rulemaking Agenda, including the amendment under consideration, may be viewed on the Secretary of State's website: <https://rules.sos.ri.gov/promulgations/organization/520>.

- b.) As to Definition of "Interested Person" to include Lobbyists: The gift rule prohibits public officials from accepting expensive gifts from an "interested person," which is defined to mean a person or entity with a direct financial interest in decisions made by the public official. While this definition has historically been understood to include gifts from lobbyists to the public officials they lobby, lobbyists for not-for-profit entities may not fit neatly into

this definition. This amendment to subsections (C) and (D) of 520-RICR-00-00-1.4.2 seeks to expressly prohibit expensive gifts from all lobbyists to the public officials they are lobbying.

The Ethics Commission's Rulemaking Agenda, including the amendment under consideration, may be viewed on the Secretary of State's website: <https://rules.sos.ri.gov/promulgations/organization/520>.

9. New Business proposed for future Commission agendas and general comments from the Commission.

10. 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 September 25, 2025*

# **RHODE ISLAND ETHICS COMMISSION**

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## **Draft Advisory Opinion**

Hearing Date: September 30, 2025

**Re: The Honorable Jason Knight**

### **QUESTION PRESENTED:**

The Petitioner, a legislator serving as a member of the Rhode Island House of Representatives, who in his private capacity is a criminal defense attorney licensed to practice in Rhode Island and Massachusetts, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from seeking re-certification to the list of court-appointed attorneys available to represent indigent clients in criminal matters before the Rhode Island courts.

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### **OPTION #1 RESPONSE:**

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, a legislator serving as a member of the Rhode Island House of Representatives, who in his private capacity is a criminal defense attorney licensed to practice in Rhode Island and Massachusetts, is prohibited by the Code of Ethics from seeking re-certification to the list of court-appointed attorneys available to represent indigent clients in criminal matters before the Rhode Island courts, while serving in the General Assembly and for a period of one year after leaving legislative office.

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### **OPTION #2 RESPONSE:**

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, a legislator serving as a member of the Rhode Island House of Representatives, who in his private capacity is a criminal defense attorney licensed to practice in Rhode Island and Massachusetts, is not prohibited by the Code of Ethics from seeking re-certification to the list of court-appointed attorneys available to represent indigent clients in criminal matters before the Rhode Island courts, while serving in the General Assembly and for a period of one year after leaving legislative office.

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The Petitioner is a member of the Rhode Island House of Representatives and has served continuously in that capacity for the last eight years. He represents House District 67, encompassing Barrington and Warren. The Petitioner states that in his private capacity he is licensed to practice law in Rhode Island and Massachusetts and works full-time as a criminal defense attorney. The Petitioner further states that, prior to and at the time of his election to the House of Representatives in 2016, he was certified by the Rhode Island Judiciary to appear on a rotating list of qualified attorneys licensed in Rhode Island who are available for court appointments to represent indigent clients in criminal matters before the state's courts (court-appointed list).<sup>1</sup>

The Rhode Island Supreme Court is responsible for setting the procedures for court-appointment of private counsel. Pursuant to Executive Order 2025-02 issued by the Supreme Court in April 2025,<sup>2</sup> appointments from a court-appointed list will be made only after written certification by the public defender of a person's inability to pay for an attorney and the existence of a conflict of interest on the part of the public defender in representing that person. The Executive Order contains certain other requirements relating to the application and qualification for certification to the court-appointed list. Generally speaking, an attorney must be a member of the Rhode Island Bar in good standing; provide proof of the requisite malpractice insurance coverage; acquire sufficient bonding in matters that may involve the handling and managing of funds; and be the only attorney to represent the client to whom they are assigned. The Executive Order specifies that participating attorneys are appointed pursuant to a rotating system that may only be deviated from under enumerated, special circumstances which must be noted by the appointing judicial officer in the case file. The Executive Order also states that court appointment panels "shall be structured to include as large a list of qualified and willing attorneys as is feasible."

The Petitioner explains that the court-appointed list is monitored and maintained by the Administrative Office of State Courts through a case management system. He adds that payment for services as a court-appointed attorney is issued by the Rhode Island Judiciary. The Executive Director of the Judiciary's Office of Finance and Budget (finance director) is the individual to whom those seeking to join the list of court-appointed attorneys are

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<sup>1</sup> The Sixth and Fourteenth Amendments to the United States Constitution guarantee the right of a criminal defendant to be represented by counsel, appointed by the court if the defendant is indigent, in both federal and state court proceedings. Gideon v. Wainwright, 372 U.S. 335, 344, 83 S.Ct. 792 (1963). This is accomplished in Rhode Island through referral to the Office of the Rhode Island Public Defender or, in cases in which the public defender has a conflict of interest precluding such representation, by court appointment of a private attorney to represent the indigent defendant.

<sup>2</sup> Executive Order 2025-02 supersedes and repeals 17 similar Executive Orders issued between April 1995 and July 2023.

directed regarding payment questions. In a telephone conversation with Ethics Commission staff, the finance director explained that court-appointed attorneys' fees are funded through the state's general revenue. He added that court-appointed attorneys must submit an IRS Form W-9 so that the state can later issue them a Form 1099 for tax purposes. The finance director stated that attorneys on the state's court-appointed list are not state employees but are considered independent contractors.<sup>3</sup>

The Petitioner represents that, in 2019, he requested that his name be removed from the court-appointed list based on the needs of his legal practice at that time. He states that due to changed circumstances, including a recent increase in the reimbursement rates for court-appointed counsel, he would now like to become re-certified to the court-appointed list. Cognizant of the Code of Ethics, and wishing to comply with its requirements, the Petitioner seeks advice from the Ethics Commission regarding whether, under the circumstances as described, the revolving door provisions of the Code of Ethics prohibit him from seeking re-certification to the court-appointed list.

In our analysis of the instant question presented, it is instructive to consider the history and evolution of the Code of Ethics' revolving door provisions.<sup>4</sup> The Code of Ethics contains both statutory and regulatory revolving door provisions that are applicable to current and former members of the legislature. The first of these provisions was a regulation enacted in 1991 by the Ethics Commission, aimed at barring members of the General Assembly

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<sup>3</sup> Here, as court-appointed counsel for indigent defendants, the Petitioner would be paid by the state as an independent contractor. "[A]n independent contractor relationship exists when one is retained to perform a task independent of and not subject to the control of the employer." Toledo v. Van Waters & Rogers, Inc., 92 F.Supp.2d 44, 53 (D.R.I. 2000)(citing Webbier v. Thoroughbred Racing Protective Bureau, Inc., 105 R.I. 605, 254 A.2d 285, 289 (1969); McAlice v. Safeco Life Ins. Co., 1997 WL 839882 at \*2 (R.I. Super.), *aff'd*, 741 A.2d 264 (R.I. 1999)(citing 41 Am.Jur.2d Independent Contractors § 1 (1969))). Faced with a fact pattern that is somewhat analogous to the instant situation, the Rhode Island Supreme Court determined that dentists and dental hygienists who were hired by the state to provide dental services to inmates of the Adult Correctional Institutions were independent contractors. See Absi v. State Department of Administration, 785 A.2d 554 (R.I. 2001). "[T]he test [as to] whether a person is an independent contractor is based on the employer's right or power to exercise control over the method and means of performing the work and not merely the exercise of actual control." Id. at 556 (citing Pasetti v. Brusa, 81 R.I. 88, 91, 98 A.2d 833, 834 (1953)).

<sup>4</sup> A detailed, anecdotal recounting of the Ethics Commission's and General Assembly's rationale for, and deliberations over, enactment of the revolving door provisions at issue here are recounted by former Common Cause Rhode Island Executive Director H. Philip West Jr. in his book, *Secrets & Scandals* 82, 86-89, 151-152, 167, 170-179 (Rhode Island Publications Society 2014).

from obtaining judgeships or other state jobs. Commission Regulation 520-RICR-00-00-1.5.2 Prohibition on State Employment (36-14-5007) (Regulation 1.5.2), as it is currently named, originally read as follows, in full:

No member of the General Assembly shall seek or accept state employment as an employee or consultant, not held at the time of the member's election, while serving in the General Assembly and for a period of one (1) year after leaving legislative office.

Notably, Regulation 1.5.2 as originally enacted only prohibited state employment or consulting, but did not expressly prohibit work as an independent contractor for the state. It also did not set forth any exceptions to its strict prohibition and one-year "cooling off" period. The Ethics Commission's authority to enact Regulation 1.5.2 was challenged by then-Governor Sundlun and several members of the General Assembly, ultimately resulting in an opinion of the Rhode Island Supreme Court in 1992 declaring that a 1986 amendment to the Rhode Island Constitution<sup>5</sup> vested the Ethics Commission with the limited power to enact substantive ethics laws such as Regulation 1.5.2, concurrent with the General Assembly's power to enact ethics laws "that are not inconsistent with, or contradictory to, the code of ethics adopted by the commission." In re Advisory Opinion to the Governor, 612 A.2d 1, 14 (R.I. 1992).

With the Ethics Commission's 1991 enactment of Regulation 1.5.2, and the issue of its authority to do so now settled by the Supreme Court, in 1992 the General Assembly enacted its own statutory revolving door provision, R.I. Gen. Laws § 36-14-5(n), extending its applicability beyond members of the General Assembly to include *all* state elected officials, including the five general officers:

No state elected official, while holding state office and for a period of one (1) year after leaving state office, shall seek or accept employment with any other state agency . . . other than employment which was held at the time of the official's election . . . except as provided herein.

Like the Ethics Commission's revolving door regulation, § 36-14-5(n) prohibited state *employment* but it did not expressly prohibit work as an independent contractor for the state. However, unlike Regulation 1.5.2, § 36-14-5(n) did set forth several exceptions that allow for: (1) appointment to a senior position on a general officer's or the general

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<sup>5</sup> "The general assembly shall establish an independent non-partisan ethics commission *which shall adopt a code of ethics* including, but not limited to, provisions on conflicts of interest, confidential information, use of position, contracts with government agencies and financial disclosure." R.I. Const. art III, sec. 8 (emphasis added).



assembly's staff; (2) appointment to a department director position by the governor; (3) election to a constitutional office; or (4) other employment for which the Ethics Commission determines that authorizing an exception would not create an appearance of impropriety.

In 1993, Governor Sundlun asked the Rhode Island Supreme Court to weigh in again, this time regarding the authority of either the Ethics Commission or the General Assembly to restrict the gubernatorial powers of appointment through the enactment of revolving door provisions Regulation 1.5.2 and § 36-14-5(n), respectively. In response, the Court issued an advisory opinion that reviewed, compared, and specifically upheld the constitutionality of both revolving door provisions. In re Advisory from the Governor, 633 A.2d 664 (R.I. 1993). In comparing the two provisions, the Court wrote:

The regulations complement the statute which broadens their application to a larger group of individuals. An individual could be found to have violated the regulations while being in compliance with the statute. The statute and the regulations are not inconsistent but are compatible.

Id. at 669. In finding that the revolving door provisions were constitutional, the Court wrote:

The legislative aim of the revolving-door provisions is to ensure that public officials adhere to the highest standards of conduct, avoid the appearance of impropriety, and do not use their positions for private gain or advantage. See R.I. Const., art. 3, sec. 7. The integrity of our government officials is quintessential to our system of representation. In general, the purpose of revolving-door provisions is to prevent “government employees from unfairly profiting from or otherwise trading upon the contacts, associations and special knowledge that they acquired . . . .

Id. at 471 (quoting Forti v. New York State Ethics Comm’n, 554 N.E.2d 876, 878 (1990)). The Court concluded that “the revolving-door legislation is an effective device by which the public trust may be enhanced.” Id.

While state elected officials were now clearly subject to both regulatory and statutory revolving door provisions, the Code of Ethics contained no analogous revolving door prohibitions for *municipal* elected officials. So, in 2006, the Ethics Commission adopted Regulation 520-RICR-00-00-1.5.4 Municipal Official Revolving Door (36-14-5014). The Municipal Official Revolving Door was meant to prohibit on the municipal level that which was already prohibited on the state level by Regulation 1.5.2 and § 36-14-5(n), namely, elected officials obtaining public employment within one year of leaving elective office.

As enacted, the Municipal Official Revolving Door prohibited municipal elected officials from seeking or accepting employment from the same municipality while serving in office and for a year after leaving office. Interestingly, like the statutorily enacted § 36-14-5(n), the Municipal Official Revolving Door included an express exception in cases where the Ethics Commission found that there would not be an appearance of impropriety. It also contained the first occurrence of the expanded definition of “employment” to include “service as an independent contractor or consultant to any municipality or municipal agency[.]” The reason for expanding the definition of “employment” was to ensure that an elected official could not avoid the revolving door prohibition by being deemed an independent contractor rather than an employee. As noted above, this newly expanded definition of “employment” in the Municipal Official Revolving Door was not yet included in the other revolving door provisions of the Code of Ethics.

Then, in 2007, the Ethics Commission conducted further rulemaking to cause the revolving door provisions of the Code of Ethics applicable to state officials to contain the newly expanded definition of “employment” that was included in the Municipal Official Revolving Door. First, the Ethics Commission adopted Regulation 520-RICR-00-00-1.5.6 Revolving Door, “Employment” Defined (36-14-5017), which reads:

For purposes of R.I. Gen. Laws []§ 36-14-5(n) . . . , “employment” shall also include service as an independent contractor or consultant to the state or any state agency, whether as an individual or a principal of an entity performing such service.

During the public hearing on this amendment, the Ethics Commission staff attorney noted that the intent was to mirror the language that the Ethics Commission used in its recently adopted Municipal Official Revolving Door provision. The amendment passed unanimously.

Simultaneous to the Commission’s 2007 adoption of an expanded definition of employment in § 36-14-5(n), it also amended the regulatory revolving door provision of Regulation 1.5.2 to add the following sentence:

For purposes of this regulation, “employment” shall include service as defined in R.I. Gen. Laws § 36-14-2(4) and shall also include service as an independent contractor or consultant to the state or any state agency, whether as an individual or a principal of an entity performing such service.

At the public hearing on this amendment, the Ethics Commission staff attorney explained that this amendment was simply to conform to the definition of “employment” just approved in the adoption of Regulation 1.5.6, which was intended to mirror the definition used in the Municipal Official Revolving Door regulation. The amendment passed unanimously.

Over the years, the Ethics Commission has applied § 36-14-5(n) and Regulation 1.5.2 to legislators. For example, in Advisory Opinion 2009-44, the Ethics Commission opined that both § 36-14-5(n) and Regulation 1.5.2 prohibited a state senator from providing arbitration and/or mediation services to state entities pursuant to a master price agreement with the Rhode Island Department of Administration, Division of Purchasing, although he was allowed to provide such services to non-state agencies that utilized the same master price agreement to select qualified arbitrators and mediators. See also A.O. 2006-25 (opining that the Code of Ethics prohibited a state representative from providing insurance brokerage services to a quasi-public state agency); A.O. 2001-6 (opining that the Code of Ethics prohibited a state representative from accepting work as a part-time instructor at Rhode Island College). In contrast, in Advisory Opinion 2011-25, the Ethics Commission allowed R.T. Nunes & Sons, Inc., for which a member of the Rhode Island House of Representatives was an employee, officer, and part-owner, to continue its 28-year history of providing snowplowing services to the Rhode Island Department of Transportation because it qualified as employment held at the time of the petitioner's election to the General Assembly.

Consistent with our interpretation of the revolving door provisions relative to state employment, the Ethics Commission has likewise opined that under the similarly worded Municipal Official Revolving Door provision, an elected official who resigned her municipal employment position following her election was prohibited from accepting new part-time work in the town. In Advisory Opinion 2021-9, the Ethics Commission opined that the Code of Ethics prohibited a member of the Little Compton School Committee from seeking or accepting employment, including part-time employment, as a nurse at the Wilbur McMahon School in Little Compton, to assist with the testing of students, faculty, and staff for COVID-19. There, the petitioner, who had held the position of substitute nurse at the Wilbur McMahon School prior to her election to the school committee in 2018, resigned from her substitute nurse position immediately following her election to the school committee. The Ethics Commission declined to apply the “no appearance of impropriety” exception included in the regulation given that petitioner as a member of the school committee was in the chain of command of her proposed position and “in light of the narrowness of the Town’s search to employ an individual who does not have a conflict of interest under the Code of Ethics, coupled with the potential availability of two substitute nurses and the apparent availability of the Town’s Fire Chief and EMS team to be of assistance.”

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## **OPTION #1**

In the instant matter, the Petitioner represents that he began his service on the court-appointed list prior to his election to the House of Representatives in 2016, and that he continued serving in that capacity until 2019 when he requested that his name be removed.

As a result, the Petitioner's name was not on the court-appointed list when he was re-elected in 2020, 2022, or 2024, so that the general prohibitions of § 36-14-5(n) and Regulation 1.5.2 apply, prohibiting state independent contractor work not held at the time of his election.

Unlike both § 36-14-5(n) and the Municipal Official Revolving Door provision, Regulation 1.5.2 does not contain an exception for cases in which the Ethics Commission determines there would be no appearance of impropriety. If that were not the case, it is certainly possible that the unique facts presented here would have qualified the Petitioner for the "no appearance of impropriety" exception. However, when the Ethics Commission amended Regulation 1.5.2 in 2007, to add service as an independent contractor to the definition of "employment," it did not also amend the regulation to include any exceptions, thereby reiterating its position expressed through the original enactment of Regulation 1.5.2 that members of the General Assembly are held to a higher standard than other public officials. Accordingly, it is the opinion of the Ethics Commission that the Petitioner may not re-apply to be included on the list of court-appointed attorneys, while serving in the General Assembly and for a period of one year after leaving legislative office.

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## **OPTION #2**

In the instant matter, after considering the unique facts presented, the history and evolution of the revolving door provisions of the Code of Ethics, and our past advisory opinions, it is the Opinion of the Ethics Commission that strict application of Regulation 1.5.2 here would lead to an unintended and inconsistent result. If we were applying the statutory revolving door provision of § 36-14-5(n), or if the Petitioner were a municipal appointed official, it is evident that he would qualify for an exception because allowing him to be re-certified to the revolving list of court-appointed attorneys creates no appearance of impropriety. Facts supporting this conclusion include the Petitioner's recent, prior history serving as a court-appointed attorney; that his inclusion on the list does not preclude others from also being certified to the list; that the required revolving selection process forecloses risk of favoritism in appointment; and, significantly, the clear need for more attorneys to fill the constitutionally necessary role of court-appointed conflict counsel for indigent defendants.

While Regulation 1.5.2 does not include the statutory exceptions found in either § 36-14-5(n) or the Municipal Official Revolving Door, we are of the opinion that the 2007 amendment to expand the definition of "employment" did not contemplate, nor was its intended purpose to prohibit, a public official's inclusion in a rotating list of attorneys available to accept court appointment to represent indigent defendants. Rather, the 2007 amendment was intended to guard against the creation of "independent contractor" positions in lieu of state employee positions that were already prohibited by the existing revolving door provisions. Such is not the case here. Inclusion on the judiciary's rotating

court-appointed list is not comparable to state employment. Unlike state employment, or most independent contractor positions for the state, certification to the court-appointed list is not competitive in that the Petitioner's inclusion does not limit others from application or selection. Indeed, the Executive Order creating the court-appointed panels states that the goal is to create "as large a list of qualified and willing attorneys as is feasible." Finally, the court-appointed attorneys are not supervised or directed in their work by any state employee or official but owe their fiduciary duty and loyalty only to the indigent client being represented.<sup>6</sup>

In conclusion, having found no appearance of impropriety and no conceivable indication that the Petitioner's public position could influence his re-certification to the court-appointed list, we see no rational basis to support strict construction and reliance on the revolving door regulation to the exclusion of the revolving door statute's applicable exception in this case. Therefore, it is our opinion that the Petitioner is not prohibited by the Code of Ethics from seeking re-certification to the list of court-appointed attorneys available to represent indigent clients in criminal matters before the Rhode Island courts. This opinion is based on, and strictly limited to, the unique facts presented herein by this Petitioner.

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**This Draft Opinion is strictly limited to the facts stated herein and relates only to the application of the Rhode Island Code of Ethics. An advisory opinion rendered by the Commission, until amended or revoked by a majority vote of the Commission, is binding on the Commission in any subsequent proceedings concerning the person who requested the opinion and who acted in reliance on it in good faith, unless material facts were omitted or misstated by the person in the request for the opinion. 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(4)

§ 36-14-2(8)

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<sup>6</sup> In Polk County v. Dodson, 454 U.S. 312, 320-321, 102 S.Ct. 445 (1981), the United States Supreme Court found that criminal defense counsel, even if paid administratively by the state, "is not, and by the nature of his function cannot be, the servant of an administrative superior" and does not act under color of state law. The Court went on to note that the constitutional right of a criminal defendant to the assistance of counsel "is the assumption that counsel will be free of state control." Id. at 320.

§ 36-14-5(n)

520-RICR-00-00-1.5.2 Prohibition on State Employment (36-14-5007)

520-RICR-00-00-1.5.4 Municipal Official Revolving Door (36-14-5014)

520-RICR-00-00-1.5.6 Revolving Door, “Employment” Defined (36-14-5017)

Other Related Authority:

Absi v. State Department of Administration, 785 A.2d 554 (R.I. 2001)

In re Advisory from the Governor, 663 A.2d 664 (R.I. 1993)

In re Advisory Opinion to the Governor, 612 A.2d 1 (R.I. 1992)

Polk County v. Dodson, 454 U.S. 312, 102 S.Ct. 445 (1981)

Gideon v. Wainwright, 372 U.S. 335, 83 S.Ct. 792 (1963)

Toledo v. Van Waters & Rogers, Inc., 92 F.Supp.2d 44 (D.R.I. 2000)

Related Advisory Opinions:

A.O. 2021-9

A.O. 2011-25

A.O. 2009-44

A.O. 2006-25

A.O. 2001-6

Keywords:

Legislator

Prospective Employment

Revolving Door

# RHODE ISLAND ETHICS COMMISSION

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## Draft Advisory Opinion

Hearing Date: September 30, 2025

**Re: Sonia Frias**

### **QUESTION PRESENTED:**

The Petitioner, an environmental scientist with the Rhode Island Department of Health, Center for Drinking Water Quality, a state employee position, requests an advisory opinion regarding whether she is prohibited by the Code of Ethics from serving in her private capacity as a co-author for a paper intended to be published in a scientific journal which incorporates the use of data that the Petitioner compiled as part of her public duties and later requested and received in her private capacity through the state's Access to Public Records Act.

### **RESPONSE:**

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, an environmental scientist with the Rhode Island Department of Health, Center for Drinking Water Quality, a state employee position, is not prohibited by the Code of Ethics from serving in her private capacity as a co-author for a paper intended to be published in a scientific journal which incorporates the use of data that the Petitioner compiled as part of her public duties and later requested and received in her private capacity through the state's Access to Public Records Act.

The Petitioner has been employed by the Rhode Island Department of Health (RIDOH) for the past 15 years. For the last 14 years, she has been assigned to RIDOH's Center for Drinking Water Quality (CDWQ). The Petitioner states that during the past year, the CDWQ conducted a study for Per Fluorinated Alkyl Substances (PFAS) chemicals present in Rhode Island water (study). The Petitioner explains that her public duties included managing the collection of study samples and compiling the resulting data. She further explains that, once the PFAS study was completed in July 2025, a representative from the University of Rhode Island (URI) submitted a request to RIDOH under the Access to Public Records Act (APRA) seeking the sample results from the PFAS study. The Petitioner states that, following a review by RIDOH's legal department of URI's APRA request, the sample results were deemed to be public information. The Petitioner then assisted with the collection of the sample results so that RIDOH could respond to URI's

request, which it did. The Petitioner informs that RIDOH intends to use the data from the study to publish a paper in collaboration with URI.

The Petitioner states that she has been asked by a former RIDOH colleague who recently relocated to Pennsylvania to serve as the co-author of a scientific paper that he is writing about PFAS which he intends to have published in at least one scientific journal. The Petitioner further states that she would like to do this. The Petitioner represents that sometime after RIDOH responded to URI's APRA request for data from the PFAS study, the Petitioner submitted her own APRA request to RIDOH for the same information requested by URI and for additional information, as well. The Petitioner emphasizes that she made her APRA request in her private capacity, outside of her regular business hours, using her personal email address. She informs that following the review of the Petitioner's APRA request by RIDOH's legal department, the data was deemed to be public information and was sent by RIDOH to the Petitioner at her personal email address.

The Petitioner represents that she has analyzed the data that she obtained from RIDOH in response to her APRA request and that she plans to incorporate that data into the paper that she has been asked to co-author. She explains that she will also offer comments and suggested edits to the other author of the paper, as appropriate. The Petitioner emphasizes that she will not use confidential information that she acquired during the course of and by reason of her public duties as a co-author of the paper. The Petitioner further emphasizes that she will not receive compensation of any kind for her contribution to the paper, nor will she derive any other direct financial benefit. The Petitioner states that she has been interested in publishing for some time and that a paper on the topic of PFAS will be useful to people throughout the world. The Petitioner informs that she has received permission from her supervisors at RIDOH to contribute as a co-author of the paper, but that her supervisors have withheld permission for the Petitioner to disclose her affiliation with RIDOH in the paper. It is under this set of facts that the Petitioner seeks guidance from the Ethics Commission regarding whether she is prohibited by the Code of Ethics from co-authoring the subject paper in her private capacity.

The Code of Ethics states that a public 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 her duties or employment in the public interest. R.I. Gen. Laws § 36-14-5(a). A public employee has an interest which is in substantial conflict with the proper discharge of her duties or employment in the public interest if she has reason to believe or expect that she, any person within her family, her 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. R.I. Gen. Laws § 36-14-7(a). Further, §§ 36-14-5(c) and 36-14-5(d) prohibit the use and/or disclosure of confidential information acquired by a public employee during the course of or by reason of her official employment, particularly for the purpose of obtaining financial gain. Section 36-14-5(d) also prohibits the use of public



office to obtain financial gain. Finally, the Code of Ethics provides that a public employee shall not accept other employment that would impair her independence of judgment as to her official duties or require or induce her to disclose confidential information acquired by her in the course of her official duties. § 36-14-5(b).

Here, the instant Petitioner seeks an advisory opinion relating to an action that would not be taken in her official capacity as a state employee. The Petitioner would like to contribute as a co-author to a scientific paper in her private capacity. She has received permission from her supervisors at RIDOH to do so. The Petitioner informs that although she will be making use of certain data that she compiled as part of her professional duties, that data is a public record that she requested and obtained in her private capacity by submitting an APRA request. The Petitioner emphasizes that she will not receive any monetary or other compensation for her contribution to the paper; therefore, her proposed activity neither constitutes secondary employment nor use of her public office or confidential information for financial gain under the Code of Ethics. Accordingly, it is the opinion of the Ethics Commission that the Petitioner is not prohibited by the Code of Ethics from serving in her private capacity as a co-author for the paper.

**This Draft Opinion is strictly limited to the facts stated herein and relates only to the application of the Rhode Island Code of Ethics. An advisory opinion rendered by the Commission, until amended or revoked by a majority vote of the Commission, is binding on the Commission in any subsequent proceedings concerning the person who requested the opinion and who acted in reliance on it in good faith, unless material facts were omitted or misstated by the person in the request for the opinion. 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:

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

Keywords:

Compensation  
Secondary Employment

# RHODE ISLAND ETHICS COMMISSION

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## Draft Advisory Opinion

Hearing Date: September 30, 2025

**Re: William J. DePasquale Jr., AICP**

### **QUESTION PRESENTED:**

The Petitioner, the town planner for the Town of Exeter, a municipal employee position, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from performing his public duties relative to an application by the town's assistant clerk in her private capacity for the subdivision of a parcel of land that she owns in the town.

### **RESPONSE:**

It is the opinion of the Ethics Commission that the Petitioner, the town planner for the Town of Exeter, a municipal employee position, is not prohibited by the Code of Ethics from performing his public duties relative to an application by the town's assistant clerk in her private capacity for the subdivision of a parcel of land that she owns in the town.

The Petitioner is the town planner for the Town of Exeter, having been employed in that position since his appointment to it by the Exeter Town Council in 2021. He states that he works part-time for a total of 21 hours each week. The Petitioner further states that, as the town planner, he also serves as the town's administrative officer. He cites among his duties in that capacity responsibility for evaluating applications seeking approval of proposed minor subdivisions of property within the town. The Petitioner explains that these applications were previously brought before the town's planning board for consideration and decision. He further explains that recent amendments to state land development regulations now enable a municipal administrative officer to consider and approve subdivisions on existing public roads without the involvement of the planning board, contingent on compliance with local zoning standards.<sup>1</sup> The Petitioner informs that a preliminary application for approval of a minor subdivision includes the submission of all relevant survey plans and the completion of a checklist encompassing approximately 25 items.

The Petitioner states that he was recently contacted by a land surveyor who requested a minor subdivision checklist in anticipation of filing a preliminary application for approval

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<sup>1</sup> See R.I. Gen. Laws § 45-23-38, et seq.

of a minor subdivision on behalf of a client. The Petitioner further states that upon learning the address of the subject property from the surveyor, the Petitioner recognized the address to be that of the town's assistant clerk. The Petitioner represents that the assistant clerk is not a member of his family. He informs that he and the assistant clerk do not own or operate a business together, nor do they serve together as officers or leaders for any private organization. The Petitioner further informs that he is not privately employed by the assistant clerk and that she is not privately employed by him. The Petitioner states that neither he, nor any family member, business associate, or private employer will be financially impacted by the minor subdivision proposed by the assistant clerk. The Petitioner represents that he is concerned that his involvement with an application filed by a fellow municipal employee could violate the Code of Ethics. The Petitioner explains that, although this application has not yet been received by the town, he expects that its filing is imminent. He further explains that, given the strict deadlines associated with the processing of these applications, he is seeking guidance from the Ethics Commission now regarding whether he will be prohibited from performing his public duties relative to this particular application.

Under the Code of Ethics, a public employee may not participate in any matter in which he has an interest, financial or otherwise, that is in substantial conflict with the proper discharge of his duties or employment in the public interest. R.I. Gen. Laws § 36-14-5(a). A public employee will have an interest that is in substantial conflict with the proper discharge of his official duties if it is reasonably foreseeable that a direct monetary gain or loss will accrue by virtue of the public employee's activity to the public employee, his family member, his business associate, or any business by which he is employed or which he represents. R.I. Gen. Laws § 36-14-7(a). Further, 520-RICR-00-00-1.2.1(A)(2) Additional Circumstances Warranting Recusal (36-14-5002) states that a public employee must recuse from participation in a matter in his official capacity when his business associate, or a person authorized by his business associate, appears or presents evidence or arguments before his municipal agency. Any person within a public employee's family includes a spouse or any dependent children, as well as any person who is related to the public employee, whether by blood, marriage, or adoption and enumerated in R.I. Gen. Laws § 36-14-2(1). A business associate is defined as "a person joined together with another person to achieve a common financial objective." § 36-14-2(3). A person is defined as "an individual or a business entity." § 36-14-2(7). A business is defined as "a sole proprietorship, partnership, firm, corporation, holding company, joint stock company, receivership, trust or any other entity recognized in law through which business for profit or not for profit is conducted." § 36-14-2(2).

In order to determine whether the above provisions of the Code of Ethics are implicated, the Ethics Commission must first ascertain whether the Petitioner, his family member, his business associate, or any business by which he is employed or represents will be financially impacted by the official action that is under consideration. If a financial impact upon someone in any of the aforementioned categories is not reasonably foreseeable, then

the Petitioner is not required by these provisions of the Code of Ethics to recuse from performing his public duties relative to this particular application.

The Ethics Commission has indicated that the Code of Ethics does not consider a public body to be a “business” or the relationship between a public official and a public body to be that of “business associates.” See, e.g., A.O. 2015-27 (opining that the petitioner was not a business associate of either the Town of Westerly or the Community College of Rhode Island, notwithstanding his simultaneous employment by both public entities); A.O. 2011-29 (opining that a petitioner was not a business associates of either the Rhode Island Department of Transportation (RIDOT) or the Town of Portsmouth, notwithstanding his employment by RIDOT and his service on the Portsmouth Planning Board).

Here, the town is not a business by which the Petitioner is employed; nor is it the petitioner’s business associate. Likewise, the Petitioner and the assistant clerk are not business associates. The Petitioner states that the assistant clerk is not a member of his family, nor is she his employer or employee. Additionally, the Petitioner states that neither he, nor any family member, business associate, or private employer will be financially impacted by the minor subdivision proposed by the assistant clerk. Therefore, the above-cited provisions of the Code of Ethics are inapplicable. Accordingly, it is the opinion of the Ethics Commission that the Petitioner is not prohibited by the Code of Ethics from performing his public duties relative to an application by the town’s assistant clerk for the subdivision of her property which is located in the town.

**This Draft Opinion is strictly limited to the facts stated herein and relates only to the application of the Rhode Island Code of Ethics. An advisory opinion rendered by the Commission, until amended or revoked by a majority vote of the Commission, is binding on the Commission in any subsequent proceedings concerning the person who requested the opinion and who acted in reliance on it in good faith, unless material facts were omitted or misstated by the person in the request for the opinion. 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(1)

§ 36-14-2(2)

§ 36-14-2(3)

§ 36-14-2(7)

§ 36-14-5(a)

§ 36-14-7(a)

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

### Related Advisory Opinions:

A.O. 2015-27

A.O. 2011-29

### Keywords:

Conflict of Interest

DRAFT

Discussion and Vote on proposed regulatory  
amendments to the Code of Ethics' gift rule at  
520-RICR-00-00-1.4.2

#### 1.4.2 Gifts (36-14-5009)

- A. No person subject to the Code of Ethics, either directly or as the beneficiary of a gift or other thing of value given to a spouse or dependent child, shall accept or receive any gift of cash, forbearance or forgiveness of indebtedness from an interested person, as defined herein, without the interested person receiving lawful consideration of equal or greater value in return.
- B. No person subject to the Code of Ethics, either directly or as the beneficiary of a gift or other thing of value given to a spouse or dependent child, shall accept or receive any gift(s) or other thing(s) having either a fair market value or actual cost greater than fifty dollars (\$50)~~twenty-five dollars (\$ 25)~~, but in no case having either an aggregate fair market value or aggregate actual cost greater than one hundred fifty dollars (\$150)~~seventy-five dollars (\$ 75)~~ in any calendar year including, but not limited to, gifts, loans, rewards, promises of future employment, favors or services, gratuities or special discounts, from a single interested person, as defined herein, without the interested person receiving lawful consideration of equal or greater value in return.
1. For purposes of this regulation a "single interested person" shall include all employees or representatives of an individual, business, organization or entity.
  2. The prohibitions in this section do not apply if the gift or other thing of value is:
    - a. a campaign contribution as defined by the laws of the state;
    - b. services to assist an official or employee in the performance of official duties and responsibilities, including but not limited to providing advice, consultation, information, and communication in connection with legislation, and services to constituents; or
    - c. a plaque or other similar item given in recognition of individual or professional services in a field of specialty or to a charitable cause.

1 C. "Interested person," for purposes of this section, means:

2 1. a person, business, or other entity, whether for profit or not for profit, or a  
3 representative of such a person, ~~or~~ business, or other entity, that has a direct  
4 financial interest in a decision that the person subject to the Code of Ethics  
5 is authorized to make, or to participate in the making of, as part of his or  
6 her official  
7 duties; or

8 2. a person, business, or other entity, whether for profit or not for profit, that  
9 engages lobbyists or is a registered lobbyist or lobbying firm as defined by  
10 the laws, regulations, or municipal ordinances of this state.

11 D. The prohibitions in this section do not apply if the gift or thing of economic value  
12 is given:

13 1. because of the recipient's membership in a group, a majority of whose  
14 members are not persons subject to the Code of Ethics, and an equivalent  
15 gift is given or offered to other members of the group; ~~or~~

16 2. by an interested person who is a person within the family of the recipient,  
17 unless the gift is given on behalf of someone who is not a member of said  
18 family; or

19 3. by an interested person as defined in subsection (C)(2), that is not also an  
20 interested person as defined in subsection (C)(1), to a public official or  
21 employee who is not a member or employee of the state or municipal  
22 agency that the interested person is lobbying; or

23 4. in the form of food or beverage for immediate consumption at a reception  
24 or fundraiser to which all members of the General Assembly or statewide  
25 officers are invited and is hosted not more than once in any year by a not  
26 for profit entity that is not an interested person as defined in subsection  
27 (C)(1).

28 E. For purposes of this regulation, a gift or other thing of value is considered  
29 received when it comes into the possession or control of the person subject to



1 the Code of Ethics, or his or her spouse or dependent child, and is a gift or other  
2 thing of value subject to the requirements of this regulation unless it is  
3 immediately returned to the interested person or given to a bona fide charitable  
4 organization without benefit accruing to the person subject to the Code of Ethics.

## **Regulatory Analysis**

### **Proposed Amendments to 520-RICR-00-00-1.4.2 Gifts (36-14-5009)**

#### **Concise Summary.**

The Ethics Commission is directed by the Rhode Island Constitution to adopt a code of ethics for public officials. A rule that restricts gifts and gratuities to public officials in some circumstances is consistent with the constitution's statement that public officials "must adhere to the highest standards of ethical conduct, . . . avoid the appearance of impropriety and not use their position for private gain or advantage."

- A. **As to Gift Limits:** The Code of Ethics' gift rule has, since 2005, prohibited gifts from interested persons to public officials that are valued in excess of \$25 per gift or \$75 in aggregate from the same source. This proposed amendment to subsection (B) of 520-RICR-00-00-1.4.2 raises those limits to \$50 per gift or \$150 in aggregate to acknowledge increases in inflation over the last twenty years and moving forward. There is no expected cost to implement this amendment, nor is there any alternative approach that would be as effective or feasible.
- B. **As to Definition of "Interested Person" to include Lobbyists:** The gift rule prohibits public officials from accepting expensive gifts from an "interest person," which is defined to mean a person or entity with a direct financial interest in decisions made by the public official. While this definition has historically been understood to include gifts from lobbyists to the public officials they lobby, lobbyists for not-for-profit entities may not fit neatly into this definition. This amendment to subsections (C) and (D) of 520-RICR-00-00-1.4.2 seeks to expressly prohibit expensive gifts from *all* lobbyists to the public officials they are lobbying. There is no expected cost to implement this amendment, nor is there any alternative approach that would be as effective or feasible.

#### **Analysis of the benefits and costs of regulatory alternatives reflecting the scope of discretion provided by the statute authorizing the proposed rule.**

These proposed amendments to the gift rule are consistent with the constitutional and statutory authority provided to the Ethics Commission to adopt a Code of Ethics. See R.I. Const. art. III, sec. 8; R.I. Gen. Laws § 36-14-9(a)(3), and in light of the standards of public office-holding set forth in the Rhode Island Constitution: "The people of the State of Rhode Island believe that public officials and employees must adhere to the highest standards of ethical conduct, respect the public trust and the rights of all persons, be open, accountable and responsive, avoid the appearance of impropriety and not use their position for private gain or advantage." R.I. Const. art. III, sec. 7.

- A. **As to Gift Limits:** The Ethics Commission has historically considered both higher and lower gift limits, including zero tolerance and \$150 per gift and a \$450 aggregate in gifts from the same source. The current limits of \$25 per gift

and \$75 aggregate adopted in 2005 have proven to be fair and effective, and the proposed increase of these limits to \$50 per gift/\$150 aggregate is consistent with the rate of inflation and the gift limits established in other jurisdictions.

- B. **As to Definition of “Interested Person” to include Lobbyists:** Most lobbyists for for-profit entities are already considered to be “interested persons” under the current definition contained within the gift rule, so that the rule applies to gifts given by such lobbyists to the public officials they lobby. However, lobbyists for non-profit entities may not fit within the current definition because their clients may have more of a *policy-based* interest rather than a *financial-based* interest in the issue being lobbied. This proposed amendment closes this “loophole” by applying the gift rule to gifts given by *any* lobbyist to the public official being lobbied, regardless of whether the lobbyist’s or lobbyists’ clients’ interests are financial-based or policy-based. Closing this loophole is consistent with the authority granted to the Ethics Commission by the Rhode Island Constitution.

**Demonstration that there is no alternative approach among the alternatives considered during the rulemaking proceeding which would be as effective and less burdensome to affected private persons as another regulation. As part of this demonstration, identify any other state regulation which is overlapped or duplicated by the proposed regulation and justify any overlap or duplication.**

- A. **As to Gift Limits:** A gift limit is designed to only restrict and penalize the acceptance of significant gratuities that may influence a public official’s decision-making or independence of judgement, or would result in an appearance of impropriety. The gift rule does not overlap or duplicate other state regulations.
- B. **As to Definition of “Interested Person” to include Lobbyists:** The alternative to enacting this amendment is to treat lobbyists differently depending upon whether they represent for-profit clients or not-for-profit clients. Such disparate treatment of gifts from lobbyists does not appear to be consistent with the Rhode Island Constitution’s statement that public officials should avoid the appearance of impropriety and not use their position for private gain or advantage. The gift rule does not overlap or duplicate other state regulations.

#### **Additional considerations.**

The Ethics Commission does not expect any changes to its enforcement of the gift rule. The proposed amendment as to gift limits merely updates the gift limit to be consistent with the rate of inflation since the rule’s last amendment in 2005, while the proposed amendment to the definition of “interested person” merely makes express what has historically been understood, which is that gifts from lobbyists to those being lobbied are ethically suspect and subject to the gift rule.

## MEMORANDUM

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To: Rhode Island Ethics Commission

From: Jason Gramitt, Executive Director

Date: May 14, 2025

Re: Gift Limits – Nationwide Comparison

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Below is a comparison of gift limits included in other states' gift laws. These limits generally appear in state ethics statutes, although some may be set forth in executive orders, lobbying laws, or legislative rules. As has been previously noted, each state regulates government ethics, conflicts of interest, and gifts differently so that there are no real "apple to apple" comparisons to be made. For example, while many states regulate gifts given to public officials from those who we in Rhode Island would call "interested persons," some other states only regulate gifts from to legislators from lobbyists. Furthermore, while Rhode Island's gift regulation applies to gifts regardless of the motivation behind the gift, several states only regulate gifts made with an intent or desire to influence official decision-making. Finally, focusing only on dollar limits does not tell the whole story of which state's gift laws are more or less strict than Rhode Island's because some states with lower overall gift limits also provide numerous, generous exceptions not offered in Rhode Island, such as exceptions for gifts from "friends," gifts given to celebrate life events, and gifts of food and beverages.

The one aspect of gift regulation that most states share is treating inexpensive gifts, variously referred to as "insubstantial" or "*de minimis*," as falling outside of gift regulation. One presumes that the basis for this exclusion is that such small gifts, such as a promotional pen, cap, or t-shirt, or an inexpensive working lunch, are not likely to interfere with a public official's integrity or independence of judgement. In Rhode Island, since 2005, individual gifts with a value of \$25 or less, or several gifts from the same source in one calendar year with an aggregate value of \$75 or less, are not prohibited.

Some states adjust their gift limits from time to time based on changes to the consumer price index, which is a measure of the average change over time in prices paid by urban consumers for a market basket of consumer goods and services. According to the consumer price index calculator maintained by the U.S. Bureau of Labor Statistics, \$25 spent in 2005 when the Ethics Commission last amended the gift regulation had the same buying power as approximately \$41 spent today.<sup>1</sup>

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<sup>1</sup> [www.bls.gov/data/inflation\\_calculator.htm](http://www.bls.gov/data/inflation_calculator.htm) (last accessed May 13, 2025).

Below is a very simplified listing of the dollar amounts that other states consider to be so insubstantial, or *de minimis*, as to be excluded from various gift laws. This listing is a consolidation of information on state gift rules compiled separately by the National Association of Attorneys General,<sup>2</sup> the Council on Government Ethics Laws,<sup>3</sup> and the National Conference of State Legislatures,<sup>4</sup> supplemented by independent Ethics Commission staff research.

Utilizing these figures, the mean (average) gift limit is \$68. The median (middle number in the range) gift limit is \$50. The mode (most frequently recurring) gift limit is also \$50.

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**Alabama**: \$32/\$64 aggregate limits: Adjusted from time to time based on Consumer Price Index.

**Alaska**: \$250 limit.

**Arizona**: Prohibits acceptance of “valuable” gifts, defined by General Accounting Office as gifts with more than \$25 value.

**Arkansas**: \$100 limit.

**California**: \$250 limit.

**Colorado**: \$75 limit: Adjusted every four years based on Consumer Price Index.

**Connecticut**: \$10 limit; \$50 for food and beverages.

**Delaware**: No limits, but gifts valued at more than \$250 must be reported.

**Florida**: \$50 limit.

**Georgia**: \$75 limit.

**Hawaii**: No limits, but gifts are prohibited if it can be reasonably inferred that the gift was intended to influence.

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<sup>2</sup> <https://www.naag.org/state-gift-laws/> (last accessed May 8, 2025).

<sup>3</sup> [https://cdn.ymaws.com/www.cogel.org/resource/resmgr/cogel\\_blue\\_books/cogel\\_blue\\_book\\_2024\\_ethics\\_.pdf](https://cdn.ymaws.com/www.cogel.org/resource/resmgr/cogel_blue_books/cogel_blue_book_2024_ethics_.pdf) (last accessed May 8, 2025).

<sup>4</sup> <https://www.ncsl.org/ethics/legislator-gift-restrictions> (last accessed May 12, 2025).

**Idaho**: \$50 limit.

**Illinois**: \$100 limit.

**Indiana**: \$50 limit.

**Iowa**: Limit of \$3 or less per calendar day, but many exceptions.

**Kansas**: \$40 limit.

**Kentucky**: No limits, but gifts valued at more than \$200 must be reported.

**Louisiana**: \$79 limit on food and drink, adjusted each year based on Consumer Price Index.

**Maine**: \$300 limit on gifts, but an exception for gifts based on personal friendship.

**Maryland**: \$20 limit.

**Massachusetts**: \$50 limit.

**Michigan**: Adjusted \$76 limit on gifts of food and beverages from lobbyists to public officials.

**Minnesota**: \$5 limit on trinkets or mementos.

**Mississippi**: \$10 limit on food and beverages for immediate consumption from a lobbyist.

**Missouri**: No general limits, but \$10 limit on souvenirs or mementos.

**Montana**: \$50 limit.

**Nebraska**: \$50 per month limit.

**Nevada**: Gifts of any value prohibited, but many exceptions.

**New Hampshire**: \$50/\$250 aggregate limit.

**New Jersey**: Zero tolerance except in limited circumstances.

**New Mexico**: \$250 limit.

**New York**: \$15 limit, but many exceptions.

**North Carolina:** Zero tolerance, but many exceptions.

**North Dakota:** Zero tolerance for gifts from lobbyists to public officials, but many exceptions.

**Ohio:** \$75 limit for gifts to legislators from legislative agents.

**Oklahoma:** \$20/\$50 aggregate limits, but many exceptions.

**Oregon:** \$50 limit.

**Pennsylvania:** No gift limits, but gifts must be reported if more than \$250 aggregate.

**Rhode Island:** \$25/\$75 aggregate limits.

**South Carolina:** \$50/day and \$400 aggregate limits on gifts to legislators from lobbyist's principals.

**South Dakota:** \$100/year limit on gifts to legislators from lobbyists.

**Tennessee:** \$50 limit on food, beverages, and entertainment offered at in-state event to all members of the General Assembly.

**Texas:** \$500 limit on gifts from lobbyists; \$50 limit on gifts from other interested persons.

**Utah:** \$50 limit.

**Vermont:** \$50/\$150 aggregate limits.

**Virginia:** \$100 limit.

**Washington:** \$50 limit.

**West Virginia:** \$25 limit.

**Wisconsin:** Limit on gifts of "substantial value".

**Wyoming:** \$250 limit.

## Depina, Sabrina (ETHICS)

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**From:** Barbara Ann Fenton-Fung <ba@allanfung.com>  
**Sent:** Tuesday, July 29, 2025 10:02 AM  
**To:** Ethics Comments  
**Subject:** Re: Notice of Proposed Rulemaking

**This Message Is From an External Sender**

This message came from outside your organization.

Report Suspicious

Are antique cars valued at over \$23,000 prohibited as well? Asking for a friend.

On Tue, Jul 29, 2025 at 9:53 AM Ethics Comments <[Ethics.Comment@ethics.ri.gov](mailto:Ethics.Comment@ethics.ri.gov)> wrote:

Good morning,

Please be advised that, pursuant to its authority granted by R.I. Const. art. III, sec. 8 and R.I. Gen. Laws § 36-14-9(a)(3), the Rhode Island Ethics Commission has initiated a proposed rulemaking process relative to the Code of Ethics' gift rule contained in 520-RICR-00-00-1.4.2. For more information, please see the attached Notice of Proposed Rulemaking.

Thank you.



**Rhode Island Ethics Commission**

T: (401) 222-3790

E: [ethics.email@ethics.ri.gov](mailto:ethics.email@ethics.ri.gov) | <https://ethics.ri.gov>

40 Fountain Street, 8<sup>th</sup> Floor | Providence, RI 02903

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## Depina, Sabrina (ETHICS)

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**From:** Keith Hamilton <keithhamilton@cox.net>  
**Sent:** Tuesday, July 29, 2025 10:10 AM  
**To:** Ethics Comments  
**Subject:** Re: Notice of Proposed Rulemaking

### This Message Is From an External Sender

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Good!!

On Tuesday, July 29, 2025 at 09:54:36 AM EDT, Ethics Comments <ethics.comment@ethics.ri.gov> wrote:

Good morning,

Please be advised that, pursuant to its authority granted by R.I. Const. art. III, sec. 8 and R.I. Gen. Laws § 36-14-9(a)(3), the Rhode Island Ethics Commission has initiated a proposed rulemaking process relative to the Code of Ethics' gift rule contained in 520-RICR-00-00-1.4.2. For more information, please see the attached Notice of Proposed Rulemaking.

Thank you.



### Rhode Island Ethics Commission

T: (401) 222-3790

E: [ethics.email@ethics.ri.gov](mailto:ethics.email@ethics.ri.gov) | <https://ethics.ri.gov>

40 Fountain Street, 8<sup>th</sup> Floor | Providence, RI 02903

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## Depina, Sabrina (ETHICS)

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**From:** sjpilz@cox.net  
**Sent:** Thursday, August 14, 2025 10:55 AM  
**To:** Ethics Comments  
**Cc:** sjpilz@cox.net  
**Subject:** Comment on Public Notice of proposed Rulemaking

**This Message Is From an External Sender**

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[Report Suspicious](#)

I received the undated letter / memo titled "RI Ethics Commission – Public Notice of Proposed Rulemaking" and would like to submit the following:

1. Define nature of gift: cash and or tangible item
2. Define 'Public Official' : paid, lobbyist, full time, part time and or voluntary ( ex: I am voluntary on the Board of Examiners of Landscape Architects)
3. Define Gifts from whom: Interested person, acquaintance, and or stranger ( ex: theoretically person "A" could give person "B" \$5,000 cash to give to public official "C". Person "A" benefits but did not DIRECTLY give public official "C" the gift.
4. Define aggregate time line: 'in aggregate from the same individual donor within any calendar year'.
5. Define 'expensive gifts': expensive gift is any cash or tangible item valued over \$50 / gift or \$150 / annual aggregate.

It is hoped that these comments will result in clarity.

Thank you.

Steve

**Steven J. Pilz, RLA, ASLA**  
President  
Giovanni Design Assoc., Inc.  
35 Anthony Drive  
Cranston, RI 02921

E: sjpilz@cox.net  
C: 401-316-8722

## Depina, Sabrina (ETHICS)

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**From:** M. Franzen <franz061@gmail.com>  
**Sent:** Thursday, August 28, 2025 8:26 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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I am retired and live in Bristol. Rhode Island has a bad reputation for corruption, and unlimited gifts make it worse.

When public officials and employees take gifts from people trying to influence them, they are receiving a private gain because of their public position.

Thank you for your consideration.

Maria Franzen, 406 North Ln, Bristol, RI 02809

## Depina, Sabrina (ETHICS)

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**From:** Bill Dennen <dennen@gmail.com>  
**Sent:** Thursday, August 28, 2025 9:59 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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My name is Bill Dennen, and I live in Cumberland, RI. I currently serve on the Advisory Board of Common Cause Rhode Island. Previously, I was a member of the Cumberland School Committee.

I believe the Ethics Commission plays a vital role in maintaining citizens' faith in our institutions. A big part of this is ensuring that elected public officials and public employees are not using their positions for their own gain. We need strict limits on gifts that these officials and employees can receive. These limits should restrict gifts from all lobbyists, as well as those who employ lobbyists. It's vital to close loopholes that eventually erode public trust.

Thank you for your consideration on this manner, and thank you for serving the people of Rhode Island.

Bill Dennen  
Cumberland, RI

## Depina, Sabrina (ETHICS)

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**From:** Roger Carlsten <rogernc@mac.com>  
**Sent:** Thursday, August 28, 2025 11:52 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Hello from a concerned citizen - happen to reside in Providence - who shares a similar opinion of so many across our entire state.

There should be an absolute prohibition of any legislators accepting any gifts from lobbyists.

Even if this doesn't influence - which it could overtly or subliminally - him or her, the public's question & suspicion could surely be damaging.

When public officials and employees take gifts from people trying to influence them, they are receiving a private gain because of their public position.

Thank you for your attention & hopeful support.

Roger Carlsten  
15 Pratt St  
Providence, RI 02906

## Depina, Sabrina (ETHICS)

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**From:** CAROL J CRAIG <teacherjcraig@aol.com>  
**Sent:** Friday, August 29, 2025 8:37 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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To the Ethics Commission,

I am a member of Common Cause Rhode Island and I believe we need to close a loophole regarding acceptance of gifts.

I believe it is a problem that our government employees are allowed to take gifts from some lobbyists. I recommend we change the term of interested persons. I think all lobbyists should not be allowed to give gifts of more than \$25.

I believe that the Ethics Commission is currently reviewing this matter.

I wanted to make sure that I shared my viewpoint on this issue. Thank you very much for taking my thoughts into consideration while you consider this important decision.

Thank you for considering my opinion,  
Carol J Craig

Sent from my iPhone

## Depina, Sabrina (ETHICS)

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**From:** Ethan Gyles <ethangy@gmail.com>  
**Sent:** Friday, August 29, 2025 10:10 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Chair Jones and Honorable Commissioners:

My name is Ethan Gyles, and I'm a Providence resident. While important strides have been made in recent decades, ethical government in Rhode Island is an ongoing project. I thank each of the Commissioners for their work on it.

One simple but important step we can take in that ongoing project is to limit the gifts elected officials and public employees can accept from lobbyists. It was actually a surprise to me to learn recently that this lobbying loophole still exists. I think it would shock most Rhode Islanders to know it, and contribute to their existing lack of trust in state government. Lobbying has plenty of influence in our state (and nation) without the added problem of gift giving on top of it. Let's fix that.

I encourage the Commissioners to take the sensible step to promptly close the lobbyist gift loophole by adopting the language Common Cause Rhode Island has proposed. Thank you very much for considering my input.

Sincerely,  
Ethan Gyles

100 Freeman Parkway  
Providence, RI 02906  
egyles@gmail.com

## Depina, Sabrina (ETHICS)

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**From:** Cindy Capra <cindycapranp@gmail.com>  
**Sent:** Friday, August 29, 2025 10:55 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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My name is Cindy Capra. I am a licensed Nurse Practitioner and have lived in Barrington RI for 38 years, and resided in Rhode Island for 41 years. I am writing to strongly urge the Ethics Committee to close the loophole which allows public officials and state employees to accept unlimited gifts from certain lobbyists.

The current status quo which legally permits unlimited gifts if lobbyists/ their employers do not gain financially from a policy change, is a blatant recipe for corruption in government. The receiving of any gift can only lead to the obvious question of whether the recipient was unduly influenced by the private gift, which was given precisely because of the recipient's public position. It is indeed unethical that any public official/state employee be allowed to be potentially swayed by gifts, to make decisions not in the interests of the Rhode Islanders they serve, but ones which favor the interests of powerful lobbies. Consider that lobbyists seeking to promote charter school expansion may curry favoritism with gifts to Education Board members. Those seeking to influence tax rates that favor the sector of their particular lobby could gift legislators whose vote is important to secure this. It seems that the very purpose of the Ethics Commission constitutionally would include a goal to prevent the existence of such an unethical loophole!

There is already overwhelming, blatant, unethical political influence in America today. I urge the Ethics Committee to adopt the Common Cause Rhode Island language to close this loophole. Being guardians of ethical government in our small state has the potential to set a big example. Thank you for your consideration.

Cindy Capra

41 N Lake Dr.

Barrington, RI 02806



## Depina, Sabrina (ETHICS)

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**From:** Sheila OConnell <sheila.s.oconnell@gmail.com>  
**Sent:** Friday, August 29, 2025 3:17 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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I am a Providence resident.

Please close the RI Lobbyist Loophole and limit gifts equally from ALL lobbyists and the people who employ them. It is not hard to come up with examples of how public officials and employees could make decisions based on the receipt of such gifts as are now allowed under the lobbyist loophole. Let's continue to improve Rhode Island by eliminating the current potential for conflicts of interest related to unlimited gifts. I want to live in a state where ethics and fairness prevail!

Thank you for the work you do, and for reading my input. Common Cause RI has suggested language which will unambiguously close the Lobbyist Loophole. I urge you to adopt it.

Sheila O'Connell  
182 Everett Ave  
Providence RI 02906

## Depina, Sabrina (ETHICS)

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**From:** George Voutes <george\_voutes@hotmail.com>  
**Sent:** Friday, August 29, 2025 5:08 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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My name is George Voutes. I believe that taking gifts from lobbyists leads to favoritism.

Gifts to lawmakers lead to favoritism towards the gift giver.

Thanks for closing the lobbyist loophole.

George Voutes, Bristol RI

## Depina, Sabrina (ETHICS)

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**From:** Gregory Huet <gmhuet1@gmail.com>  
**Sent:** Friday, August 29, 2025 7:30 PM  
**To:** Ethics Comments  
**Cc:** Huet Greg  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2"

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My name is Gregory Huet and I live in Middletown, RI.

Limiting gifts to public officials significantly helps in reducing corruption and the incentives to engage in actions that are not in the best interests of the taxpayers and community in general.  
Public officials should be held to a higher standard given the trust the citizens have provided to them to work on their behalf.

Please close the loophole that allows public officials to accept unlimited gifts from some lobbyists.

GREGORY M. HUET  
CAPT, USN (Ret.)  
MS, MMS, LFACHE  
gmhuet1@gmail.com  
M: 540 446-6045

## Depina, Sabrina (ETHICS)

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**From:** Harvey Buford <harvey.t.buford@gmail.com>  
**Sent:** Saturday, August 30, 2025 2:13 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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I am Harvey Buford of Hopkinton. Not only do we need to prevent public officials from accepting this kind of money and the strings attached, we need to always avoid any appearance that they might have been bought.

Any gift to anyone from a lobbyist is meant to buy your influence and should not be allowed.

Please prohibit this damaging loophole.

Harvey Buford,

36B Oak St

Ashaway, RI 02804

## Depina, Sabrina (ETHICS)

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**From:** Susan Aitcheson <eg1295@gmail.com>  
**Sent:** Saturday, August 30, 2025 2:20 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Committee Members

I founded a nonprofit housing development corporation in RI in 1979. I have seen RI's gaining more faith in their government as the ethics reforms of the 1990's came into place. I worked with Cities and State government regularly and watched the Mayors and a Governor be convicted of serious crimes.

Legislators should not be taking gifts from lobbyists, period. There has been a serious loss of faith in our government due to the scandals of mayors regularly taking bribes from city contractors. This is the time to close the lobbyist loophole. The Ethics Commission needs to stand strong and have the teeth needed to protect our democracy from being regularly sold. RI deserves better.

Thank you for taking these comments and for the work that you do. I ask you to adopt the Common Cause RI language to close the loophole.

Sincerely,

Susan Aitcheson

Susan Aitcheson  
Artist

[eg1295@gmail.com](mailto:eg1295@gmail.com)  
401-641-6033  
1295 South Road, East Greenwich, RI 02818  
[www.susanaitcheson.com](http://www.susanaitcheson.com) [[susanaitcheson.com](http://susanaitcheson.com)]  
Providence Art Club Artist Member

## Depina, Sabrina (ETHICS)

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**From:** Jessica David <jldavid14@gmail.com>  
**Sent:** Sunday, August 31, 2025 3:17 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Hello!

My name is Jessica David, and I live in East Greenwich. I believe that ethical government is necessary for quality of life, well-being, and social resilience. Rhode Islanders deserve government officials who act with the highest personal standards for ethics.

Elected and public officials should not be accepting gifts from lobbyists, period. And lobbyists should not be using gifts to influence officials. This seems like a clear line, whether or not there is a direct financial benefit. The existence of this loophole puts undo pressure and scrutiny on all lobbyists, including those acting with clear ethical boundaries.

Thank you for the opportunity to share my concerns and position. I hope you will adopt the language proposed by Common Cause Rhode Island to close the Lobbyist Loophole.

Jessica David  
10 Bicknell Ave.  
East Greenwich

## Depina, Sabrina (ETHICS)

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**From:** Cathy Saunders <cwsaunders@icloud.com>  
**Sent:** Monday, September 1, 2025 9:59 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Members of the Commission:

I have been a resident of Rhode Island since 2002. I moved to the state during the trial of Buddy Cianci. The moment seemed like a turning point in Rhode Island's history. I was shocked to learn about Rhode Island's reputation of "I know a guy" style of politics and government, and have been pleased to see efforts to move towards responsible accountable government.

One glaring loophole in the ethics rules is that public officials and employees can take unlimited gifts from all lobbyists and those who employ lobbyists. Lobbyists, by definition, are trying to influence decision making, regardless of whether they stand to financially benefit from what they are lobbying about. Decisions of public officials and employees should be influenced by good data, public input, and thoughtful deliberation, not by lunches, perks, and other gifts from lobbyists.

Thank you for your time and attention to this matter. Your volunteer service to the Ethics Commission is greatly appreciated.

Catherine Saunders

46 Woodbury St.

Providence RI

## Depina, Sabrina (ETHICS)

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**From:** zack mezero <zackmezero@pm.me>  
**Sent:** Tuesday, September 2, 2025 1:11 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2  
**Attachments:** 2025-09-02 RI Ethics Commission testimony.pdf

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
Report Suspicious

Good afternoon,

Please find attached my comments regarding proposed changes to 520-RICR-00-00-1.4.2.

Thank you.

**zack mezero.** (he/him)  
zackmezero@pm.me  
(401) 787-6671

 [Schedule a meeting with me \[go.zackmezero.com\]](https://go.zackmezero.com)



M. Zachary Mezera  
zackmezera@pm.me

September 2, 2025

Members of the Rhode Island Ethics Commission:

My name is Zack Mezera. I'm a Providence resident, a registered lobbyist for many years, and a former Commissioner on the Providence Ethics Commission. During approximately 15 years working in Rhode Island's "political sector", from elections to policy advocacy I've witnessed both the power of strong ethics rules and the damage caused by loopholes that permit bad actors to game the system.

Having worked extensively within and alongside both 501(c)(3) and 501(c)(4) organizations in particular, I find it troubling that our current gift rule treats nonprofit lobbyists differently than their for-profit counterparts. I believe this distinction undermines public trust. Whether representing a corporation or a charitable organization, lobbyists aim to influence government decisions. The tax status of their employer bears little upon this core function. When lobbyists offer gifts to those with power—whether on tax policy, state contracting processes, or even ethics regulations themselves—they blur the line between public service and personal benefit.

My understanding is that the ethics amendments to the Rhode Island Constitution established clear expectations: public servants must "avoid the appearance of impropriety" and refuse to leverage their positions for personal advantage. This principle should apply universally, not selectively based on tax-status technicalities. (Indeed given nonprofits' tax exempt status, I would argue the bar should be *even higher* for lobbyists representing these entities.)

Therefore, I encourage you to adopt Common Cause Rhode Island's proposed language and close this lobbyist loophole. Uniform gift restrictions across all lobbying activities will strengthen the ethical framework that Rhode Islanders rightfully expect from their government.

Respectfully submitted,

M. Zachary Mezera  
Providence

## Depina, Sabrina (ETHICS)

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**From:** Jessie Kingston <potterkingston@gmail.com>  
**Sent:** Tuesday, September 2, 2025 2:40 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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My name is Jessie Kingston, I'm from Providence and a member of Common Cause Rhode Island. I'm retired and therefore able to spend some time at the State House advocating for a number of issues I care about— issues of personal interest and for the good of all Rhode Islanders. From time to time, I noticed a specific question would arise as to a certain legislator that was referred to the Ethics Commission for a ruling. The ones I recall all had to do with potential conflicts of interest. I was glad to know Rhode Island had an Ethics Commission.

Conflict of interest is at the heart of the proposed Amendment I am testifying in support of here today. In order to close what has been shown in a recent egregious example to be a serious and dangerous loophole in the gift rule as currently written, I wholeheartedly agree that the language in this rule must be amended so as to be explicit that gifts are limited from all lobbyists and those who employ lobbyists, regardless of whether the lobbyist's or the lobbyist's client's interests are financially or policy based.

One has only to look to current events at the federal level to see how dangerous and disastrous unlimited gifts and monetary contributions are to good government and a properly functioning democracy. While it is my understanding the Commission has not exercised its power to make new rules in several years, I have to wonder: if not now, then when? Rhode Island can act locally while thinking globally and join other states who have already made this ruling.

I respectfully urge you to rectify this loophole and pass the proposed Amendment. Thank you for considering my comments.

Jessie Kingston

690 Elmgrove Ave

Providence RI 02906

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## Depina, Sabrina (ETHICS)

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**From:** Kate McGovern <katemcgovern.providence@gmail.com>  
**Sent:** Tuesday, September 2, 2025 3:16 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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To the Rhode Island Ethics Commission:

I'm Kate McGovern and I'm writing to submit comments on proposed changes to 520-RICR-00-00-1.4.2.

I moved to Providence from New Hampshire in 2018. My husband and I joined the First Unitarian Church of Providence and I became active in the Legislative Ministry's campaigns on social justice issues. I also teach civics at College Unbound.

When I arrived, I assumed all was well with ethical government in Rhode Island. Operation Plunder Dome was in the distant past and "The Prince of Providence" had been transformed into nostalgic entertainment.

However, I became increasingly concerned that all was not well. Relatively uncontroversial legislation remained stuck in "study" status for years without getting a vote. Meanwhile bills favoring corporate interests were introduced late in the session and sailed right through.

It wasn't until I read Phil West's "Secrets and Scandals" that I realized how tough the struggle had been for the separation of powers. Frankly, I was shocked by the level of resistance to even the most basic reforms. The practice of patronage was so pervasive and entrenched, I realize that the establishment of this Commission was a remarkable victory.

So, now, I urge you to take the next step for the cause of ethical government in Rhode Island by closing the lobbyist loophole.

The idea that lobbyists are permitted to give unlimited gifts if they don't gain a direct financial benefit is bizarre. It overlooks the fact that their (often lucrative) employment relies on having a reasonable level of success representing their employers' interests. Those interests are aligned. The lobbyists are certainly "interested persons" regardless of whether they represent struggling nonprofits or Fortune 500 corporations.

Let's continue to put Rhode Island's unethical past in the rearview mirror as we join the 23 other states that ban lobbyists' gifts.

Thank you for your work and your consideration of this important matter. I urge you to act to close the lobbyist loophole.

Sincerely,

Kate McGovern

83 Freedom Rd.

Providence, RI 02909

## Depina, Sabrina (ETHICS)

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**From:** Angela Lima <amccalla@wfri.org>  
**Sent:** Tuesday, September 2, 2025 4:23 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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*Honorable Chair and Members of the Ethics Commission,*

*My name is Angela Lima and I work as the policy and advocacy program director for the Women's Fund of Rhode Island. I am writing in strong support that you support limiting gifts that public officials can take from all lobbyists. Ethics commissions in states are crucial for upholding public trust and ensuring government accountability by enforcing ethics laws, promoting transparency, and preventing conflicts of interest. They play a vital role in maintaining the integrity of state government by overseeing ethical conduct, providing guidance on ethical dilemmas, and investigating potential violations.*

*Ethics commissions are responsible for interpreting and enforcing state ethics laws, including conflict of interest regulations. By requiring disclosure of financial interests and lobbying activities, these commissions help make government operations more transparent and accountable to the public.*

*Limiting lobbyist contributions to public officials be reported (whether special interests are gained or not) is crucial for maintaining a healthy democracy, ensuring that decisions are made in the public interest. Doing so can reduce the risk of corruption, enhance public trust, and promote fairer policies. It is a vital step in safeguarding democracy and ensuring that policies are made in the best interests of the people.*

*Thank you for your time, consideration, and leadership in your important and critical role. I urge you to adopt the language developed by Common Cause in order to close this particular loophole.*

*Best,*

*Angela Lima*

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**Angela Lima, Policy and Advocacy Program Director**  
Women's Fund of Rhode Island [wfri.org]

## Depina, Sabrina (ETHICS)

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**From:** Susan Kelley <skelley1236@gmail.com>  
**Sent:** Tuesday, September 2, 2025 7:46 PM  
**To:** Ethics Comments  
**Cc:** rhodeisland@commoncause.org  
**Subject:** Comments on proposed changes to 520-RICR-00=00-1.4.2

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My name is Susan Kelley, and I am a retired professor who taught ethics in every class. Rhode Island is too well known for having a corrupt government, so we need to do everything we can to increase efforts to clean up all ethical loopholes.

When I was teaching, I one time, and only one time, sent an arrangement of flowers to an administrator to thank him for how he had helped me. He immediately returned it to me and told me he cannot accept gifts. This is how it should be for our legislators. A gift corrupts. At the moment I sent the flowers, I only felt my gratitude, not how I was asking the administrator to compromise himself. His lesson to me has been a lasting one.

Any gift encourages a legislator to favor the gift giver. Emotionally, no matter how a legislator claims to hold onto his neutrality, a gift leads positive thoughts. This can affect what bills are passed and which are not passed. Legislators shouldn't be able to take unlimited gifts from a chamber of commerce lobbyist before voting on a bill to lower corporate tax rates, for example.

Moreover, the gift gives the receiver a profit of sorts. That profit, to continue, needs to continue. No legislator should profit from their position.

We need to make sure that no one in power over our legislation can be influenced by any kind of gift. There should be no gifts permitted.

Thank you for listening to me, a Rhode Island voter. I hope you will adopt the language Common Cause Rhode Island has offered to close the loophole that permits unending corruption.

Sincerely yours,

## Depina, Sabrina (ETHICS)

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**From:** Kerry Clougher <barbariansblonde@icloud.com>  
**Sent:** Wednesday, September 3, 2025 10:28 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2"

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Hello, my name is Kerry and I live in Newport. I was surprised to learn a policy exists that allows politicians and government officials to accept gifts from lobbyists. It seems counter to what our elected officials job really is...to represent the people, not their own interests.

It's a no brainer...do the right thing here. I don't get gifts for doing my job, I get paid a wage. Why is it ok for an elected officials to take gifts which clearly are not without strings attached.

Please stop this loophole and keep it real. Thank you for respecting the opinions of one of your constituents.

Regards,

Kerry Clougher 9 Cowsill Lane, Newport, RI 02840

September 5, 2025

R.I. Ethics Commission  
40 Fountain Street  
Providence, RI 02903

Re: Proposed Rulemaking on Gifts

Please accept these comments in response to the proposed rulemaking related to gifts. There are two proposed amendments related to the Ethics Code. The first amendment would clarify that the definition of interested person includes all lobbyists including lobbyists for non-profit entities. The second amendment would allow public officials to receive a single gift of \$50 or gifts totaling \$150 in a year from each single interested person. The second amendment would represent an increase in permissible gifts from a single gift of \$25 or gifts totaling \$75 in a year, and has been justified on the basis of inflation. In these comments, I express support for the broadening the definition of an interested person to include lobbyists for non-profit entities, but oppose increasing the amount of permissible gifts for public officials. Instead, the Ethics Commission should either adopt a zero-tolerance approach towards gifts, or in the alternative, (1) require public officials publicly disclose all gifts they receive from interested persons and (2) cap the overall amount of gifts they can receive in a year from all interested persons in total.

Let me start with a simple question. Do Rhode Island public officials *need* to receive gifts from lobbyists or other interested persons in order to perform their public duties? I say they do not. I know as a member of a local planning board, I don't. I don't need a donut from a developer to do my job. I don't need a slice of pizza to visit a site for a proposed development. Furthermore, it is wrong for certain public officials to receive *any* type of gift from an interested person. For example, gifts from landlords to building inspectors, gifts from vendors to procurement officials, gifts from criminal defendants to prosecutors, or gifts from lawyers to judges are highly inappropriate. The presumption should be that Rhode Island public officials do not need gifts to do their jobs, and the Ethics Code should reflect that. Therefore, the Ethics Commission should readopt the zero-tolerance policy towards gifts that it had in 1998.<sup>1</sup> If some Rhode Island public officials believe they need gifts in order to perform their public duties, they should come before the Ethics Commission and explain why they need gifts to do their jobs.

In the past, two major arguments were made against a zero-tolerance policy on gifts. The first major argument was that accepting gifts from interested persons is necessary to conduct state business involving economic development such as by attending sporting events, or having working meals.<sup>2</sup> If the event or the meal is truly necessary and related to their public duties, the public official should be able to seek reimbursement from the state or local government. If the public official is an elected official, the official could potentially pay for attending the event or the meal from their campaign account. The second major argument was that a zero-tolerance gift ban would apply to items of small value like a stick of gum.<sup>3</sup> Undoubtedly if a complaint was ever filed over a stick of gum, the Ethics Commission would be able to exercise its discretion to decide whether

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<sup>1</sup> H. Philip West Jr., Secrets and Scandals, at 404 (2014).

<sup>2</sup> Id., at 403-404.

<sup>3</sup> Id., at 405.



to even investigate such a complaint. The possibility that someone may inadvertently commit a small infraction of a bright-line rule does not mean you cannot have a bright-line rule.

If the Ethics Commission continues to allow public officials to accept gifts, then the Ethics Commission should require that public officials to annually report all their gifts. The public should know exactly which public officials are accepting gifts, from whom they are accepting gifts, the type of gifts they are accepting, and the dollar value of those gifts. Previously, when the Ethics Commission permitted public officials to accept a larger amount of gifts than they do currently, public officials were required to disclose their gifts. During that time, it was revealed that some public officials were receiving gifts from lobbyists in the form of tickets to sporting events, golf, and meals to expensive restaurant owners.<sup>4</sup> Some public officials may object to keeping track of and disclosing gifts of small amounts. However, public officials are already required to disclose some personal financial information involving small amounts of money such as the place of employment of their minor child if that child earned more than \$1,000 from their summer job. Also, elected officials are required to disclose donors who give campaign donations which in aggregate exceed \$200 in a year. If it is too difficult for a public official to keep track of all the gifts they received in a year, perhaps that public official should not accept gifts in the first place.

Also, if the Ethics Commission continues to allow public officials to accept gifts, then the Ethics Commission must place a limit on the total amount of gifts a public officials may accept annually. Currently there is no limit. Under the current regulations and the proposed regulations, only the amount of gifts from a *single* interested person is limited. However, a public officials can accept gifts from an *unlimited* number of interested persons. For example, currently there are approximately 605 registered lobbyists in Rhode Island. If each one of these lobbyists annually gave \$150 in gifts to a legislator, then a legislator could receive annually \$90,750 in gifts from lobbyists. This is more than annual income of a median Rhode Island household.<sup>5</sup> Public officials should not be able to receive more in gifts than an average Rhode Islanders earns in a year. Public officials should not be able to receive more in gifts than what they are paid by the public to do their public duties. The Ethics Commission should set an overall cap on the amount of gifts public officials can receive, and it should be set very low.

As for the amendment clarifying the definition of interested person, it is reasonable to make it clear that all lobbyists, including the lobbyists for or non-profits, are considered interested persons under the Ethics Code. Although non-profit entities do not provide financial profits to shareholders, non-profits can certainly be financially profitable to those who work at or work for them, including their lobbyists.

In conclusion, public officials accepting gifts reflects a tradition dating back to ancient times when governmental power was unlimited, concentrated in few hands, and exercised arbitrarily. Currying favor with the powerful through the giving of gifts was seen as a necessity. In more modern times, as governmental power has become more limited, more dispersed, and exercised with more restrictions, giving gifts to public officials has become viewed as inherently unethical and restrictions on gifts to public officials have been adopted. In Rhode Island, after the RISCDC banking crisis, restrictions on public officials receiving gifts were adopted. Unfortunately, in the

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<sup>4</sup> *Id.*, at 576-577.

<sup>5</sup> Median Household Income in Rhode Island (MEHOINUSRIA646N) | FRED | St. Louis Fed

current national political climate, opportunistic public officials are able to get away with unethical behavior. In times of political polarization, political expediency usually trumps ethics. It is as true today as it was in the days of the Roman Republic.

Although adopting a zero-tolerance policy on gifts will not change our current national political environment, it will help make Rhode Island government operate more ethically. A zero-tolerance policy on gifts will improve our reputation with those looking to do business in Rhode Island. Public officials will no longer assume that someone else can pick up the tab for their meal. Public officials will no longer think that as long as the value of a gift is small, they can feel free to go on a gift-grabbing escapade. Public officials should not feel they are entitled to gifts, and those who interact with them should not feel the need to give them gifts. A zero-tolerance policy is the *only* way to do that.

*Steven Frias  
107 Garden Hills Dr.  
Cranston RI 02920*

## Depina, Sabrina (ETHICS)

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**From:** Constance Tucker <chktucker@yahoo.com>  
**Sent:** Friday, September 5, 2025 11:20 AM  
**To:** Ethics Comments  
**Subject:** comments on proposed changes to 520-RICR-00-00-1.4.2

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My name is Constance Tucker and I am from North Kingstown. I believe we need ethical government for ourselves and for our national self-respect.

Limiting gifts from all lobbyists should help make our government responsible and honest. It would also help legislators make thoughtful decisions.

Thank you for considering this issue, and for closing the loophole.

constance tucker  
35 Washington Street  
North Kingstown ri 02852

## Depina, Sabrina (ETHICS)

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**From:** Cynthia Mulvey <20landtrust20@gmail.com>  
**Sent:** Friday, September 5, 2025 11:57 AM  
**To:** Ethics Comments  
**Cc:** John Marion; tmulvey1.tm  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

### **This Message Is From an External Sender**

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Dear Ethics RI Committee Members,

As followers of Common Cause and Ken Block's principles of fair play and taxpayer information transparency, the governor's attempt to shield state documents from our view ALONE is the reason to level the playing field in government and laws. Golf trips, liquor baskets and influence peddling are the workings of private enterprise, not public dealings with infinite consequences and potential for damage. You are expected to do your best to avoid the Appearance of Impropriety that landed on Governor McKee's, Chief Justice Bevilacqua's and Vincent Cianci's doorsteps for the same reasons. "Cappiche?"

Cynthia & Thomas Mulvey  
17 Waterview Drive  
Smithfield RI 02917

**MEL A. TOPF, Ph.D., J.D.**  
**26 ASTRAL AVENUE**  
**PROVIDENCE RI 02906**

September 5, 2025

Rhode Island Ethics Commission  
40 Fountain Street  
Providence RI 02903

*By email*

*RE: Rule 520-RICR-00-00-1. (Proposed rule regarding lobbyist gifts)*

I write in strong support of the proposed Ethics Commission amendment to the Code of Ethics restricting gifts from lobbyists.

I was an Ethics Commission member for some six years (1988-1994). During that time I pressed the Commission, with some success, to exercise its constitutional authority and duty to adopt its own ethics regulations. The Governor challenged that position, but the Rhode Island Supreme Court issued an advisory opinion that fully upheld it.

I ask the Commission to exercise that authority, and do their duty, here. Adopt the proposed rule on lobbyist gifts. It will effectively close a loophole by making it both clear and certain that all lobbyists, including those for not-for-profit entities, and those who employ them, fall under the Code's definition of "interested person." As the letter of Dec. 18, 2024 from Common Cause correctly argues, the "current requirement that there be a financial nexus for the 'gift rule' to apply is insufficient protection of the public interest."

One claim against adopting the rule is that it infringes on speech rights. This claim, however, is false. The U.S. Supreme Court has not struck down state or federal laws or regulations restricting gifts from lobbyists. Federal officials, for example, are under strict limits regarding gifts from lobbyists. Similar rules have survived challenges in other jurisdictions. Further, to the extent it can, possibly, be argued that restricting gifts limits speech, the "limit" is certainly not an undue burden on speech, and it is fully justified by the important principles and policies that support and protect the integrity of our government.

The Ethics Commission should strengthen the Code of Ethics by adopting the proposed Rule.

Sincerely,

Mel A. Topf

September 9, 2025

Rhode Island Ethics Commission  
40 Fountain Street, 8th Floor  
Providence, RI 02903

RE: Comments regarding proposed amendments to 520-RICR-00-00-1.4.2

Dear Members of the Rhode Island Ethics Commission:

Common Cause Rhode Island supports in part, and opposes in part, the proposed changes to 520-RICR-00-00-1.4.2 (herein referred to as the “gift rule”).

Support for changes to 520-RICR-00-00-1.4.2(C) and (D)

Common Cause Rhode Island supports the proposed changes in 520-RICR-00-00-1.4.2(C) and (D). Those changes amend the definition of an “interested person” to categorically include registered lobbyists and lobbying firms, and those who engage lobbyists.

We believe that it is a conflict of interest for those subject to the Code of Ethics to accept gifts in excess of the prescribed limits from people or organizations that are lobbying them. The current definition of an “interested person” which relies on the lobbyist, lobbying firm, or person engaging a lobbyist to have a “direct financial interest” in the outcome of the decision that the person subject to the Code of Ethics can make is insufficiently protective of the public interest.

The proposed change would affect gifts from a small universe of people; those who are being paid, or are paying, to lobby public officials and employees. The mere fact that they are paying or being paid to lobby indicates that their interest in the decisions made by the person subject to the Code of Ethics is more than simply altruistic. That is why at least 22 states have categorically banned or limited gifts from lobbyists as a class.

The proposed changes to 520-RICR-00-00-1.4.2(C) and (D) are narrowly tailored. 520-RICR-00-00-1.4.2(C)(3) would only regulate the gift if the lobbyist, lobbying firm, or person engaging a lobbyist, is lobbying the person subject to the Code of Ethics. Additionally, 520-RICR-00-00-1.4.2(C)(4) includes an exception for food or beverages served at events at which all the members of the General Assembly or statewide officers are invited. This exception is consistent with language in the gift rules of several other states.

We note that public comment received by the Commission has been overwhelmingly in favor of this change. The public believes that those subject to the Code of Ethics should not be allowed to take unlimited gifts from any lobbyists, or persons employing lobbyists.

Opposition to changes in 520-RICR-00-00-1.4.2(A)

Common Cause Rhode Island opposes the proposed changes to 520-RICR-00-00-1.4.2(B). These changes would raise the maximum value of a regulated gift from \$25 to \$50 and the annual aggregate value of regulated gifts from a single interested person from \$75 to \$150.

Common Cause Rhode Island believes that \$25 is the appropriate limit for permissible gifts. The limit was set to allow for interested persons to give government officials and employees *de minimus* gifts without violating the Code of Ethics. That is reflected by its colloquial name; the “cup of coffee rule.” We feel that \$25 is still a sufficient amount to allow for incidental purchases that will not unduly influence public officials and employees, while also protecting the public’s interest in clean government.

The origins of this proposed change to the gift rule is not people or entities who want to provide gifts, but rather a small group of legislators who want to take gifts in excess of the current limits. It is no surprise that the regulated entity wants higher limits—some legislators even proposed legislation that would have raised the aggregate amount to \$250 annually. We should all remember the truth that exists in the old saw that there is no such thing as a free lunch. In our view a free lunch is using a public position for private gain.

The Notice and Comment for this proposed change to the gift rule cites inflation that has eroded the value of the original amount that was adopted by the Commission more than two decades ago. We note that if the \$25 had been indexed to inflation it would only be \$42 today. The proposed change is significant in excess of the rate of inflation which we believe undermines the purpose of a rule to allow *de minimus* gifts.

In closing, we ask you to consider your charge as stated in Article III, Section 7 of the Rhode Island Constitution:

“The people of the State of Rhode Island believe that public officials and employees must adhere to the highest standards of ethical conduct, respect the public trust and the rights of all persons, be open, accountable and responsive, avoid the appearance of impropriety and not use their position for private gain or advantage.”

We believe that closing the loophole that allows public officials and employees to take unlimited gifts from some lobbyists and those who employ lobbyists, and keeping the gift limits at their current amounts, fulfills this mandate.

Thank you for considering our testimony on the proposed changes to 520-RICR-00-00-1.4.2.

Sincerely,

John Marion  
Executive Director



## Depina, Sabrina (ETHICS)

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**From:** Lamis Faris <farisl@msn.com>  
**Sent:** Friday, September 5, 2025 5:13 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2"

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To Whom It May Concern:

I am a resident of Central Falls, RI. I arrived here about 12 years ago from another State, not too far south of here.

I am quite disturbed by the fact that the ongoing dangers leading to the failure of the 195 Road/Bridge were overlooked for years by Alвити! Give me a break...for 10?, 15? years, not to mention the repair costs IF they (whoever/whomever) gets it done. There are rampant graft and corruption in many areas of our State Government. Let's at least eliminate this one! Rhode Islanders demanded ethical government when they created a constitutional Ethics Commission. Isn't there enough corruption around us in the present Federal Government to make us wary of that which exists in our precious Blue State of RI?

I thank you for reading and considering my request. Please act on closing the loopholes with stringent language that delivers no way forward for corruption.

Sincerely,

Ms. Lamis B. Faris  
404 Roosevelt Ave.  
Central Falls, RI  
02863



## Depina, Sabrina (ETHICS)

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**From:** Karen Ng <dockng@hotmail.com>  
**Sent:** Friday, September 5, 2025 8:50 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Hello,

My name is Karen Ng and I live in Tiverton, RI. I work as a primary care physician in RI and strongly support limiting gifts to public officials especially from lobbyists. We need strict limits on gifts that public officials and employees can take from those trying to influence their decisions.

Thanks for your consideration and PLEASE do the ethical thing by adopting the Common Cause language to close this loophole.

Sincerely,  
Karen Ng

## Depina, Sabrina (ETHICS)

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**From:** Kathleen Odean <kathleenodean@gmail.com>  
**Sent:** Saturday, September 6, 2025 1:49 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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I'm a retired children's librarian from North Kingstown. I am writing because I believe the Ethics Commission is vital in fighting corruption in Rhode Island.

I was surprised to learn that the gift rule does not apply to taking gifts from lobbyists who work for organizations such as the Chamber of Commerce and professional associations. Surely such lobbyists might offer gifts in order to influence public officials or employees, since the goal of lobbying is to influence decisions. Why should public officials or employees gain financially in such situations? I feel strongly that they shouldn't. I understand the point of having a rule that would allow accepting a cup of coffee, but I believe there should be a rule against accepting, say, unlimited expensive dinners. Please use your rule-making power to join the twenty-plus other states that already apply their gift limit to gifts from all lobbyists.

Thank you for accepting comments from me and other concerned Rhode Islanders. I know the Commissioners and the Ethics Commission staff work hard, and I appreciate your service to our state.

--

Kathleen Odean  
North Kingstown, RI

**THE RHODE ISLAND ETHICS COMMISSION**

The Honorable Lauren Jones, Chair  
Testimony by H. Philip West Jr on September 9, 2025,  
on 520-RICR-00-00-1.4.2 (36-14-5009)  
in support of amending the “interested person” in Sections C. and D,  
and in opposition to doubling gift limit in Section B.

Thank you, Chairman Jones and members of the Ethics Commission, for this important hearing.

My name is H. Philip West Jr. I served for eighteen years as director of Common Cause Rhode Island. I remain particularly grateful to Lauren Jones for representing Common Cause *pro bono* before the Rhode Island Supreme Court in 1992. Governor Bruce Sundlun had asked the high court (1) whether the state Constitution granted the Ethics Commission “power to independently enact substantive ethics laws” and (2) whether the 1986 Ethics Amendment was valid under the Rhode Island and United States Constitutions.

The high court justices quoted your chairman’s brief extensively as they declared unanimously that Rhode Island voters had conferred valid constitutional authority on this commission to enact substantive ethics rules for all public officials in Rhode Island.<sup>1</sup>

I testify this morning as a private citizen, not on behalf of Common Cause, but I strongly affirm the Common Cause petition to close the loophole that now allows public officials to accept substantial gifts from many lobbyists and their clients.

I retired from Common Cause nineteen years ago after a cancer diagnosis. In remission, I returned to the State House four years ago as a volunteer lobbyist for the Village Common of Rhode Island, an organization that deploys volunteers to help older adults stay safely in their homes. During these years, I’ve lobbied on scores of bills we in the Village Common believed would support older adults and their helpers.

During these years back at the State House, I’ve often spoken both with former legislators who now work as lobbyists and with other professional lobbyists.

As I looked at the rule changes you’re considering today, I could not review the reports or client lists of all 606 registered lobbyists, but I examined the reports of lobbyists I had known as legislators. I found fourteen who filed lobbyist disclosures during the 2025 legislative session. (See the attached a printed document. I am filing an electronic version with active links with the commission, and you can check reports filed with the Secretary of State: <https://lobbytracker.sos.ri.gov/LobbyTrackerSearch/Profiles?FlowType=onLoad>.)

These fourteen former legislators who now work as lobbyists make a lot of money. Although the process for reporting their compensation is confusing, these lobbyists appear to have reported lobbying income for the 2025 legislative session that totaled \$3,482,537.

They reported making campaign contributions that totaled \$83,866, mostly to committee chairpersons and leaders in the Senate and House of Representatives who control the flow of legislation.

I haven’t tried to compile the contributions made by scores of other professional lobbyists, but I know many of them who also represent a wide range of clients. They also receive millions in compensation and gave tens of thousands of dollars as campaign contributions.

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<sup>1</sup> *In Re Advisory Opinion to the Governor, 612 A.2d 1 (R.I. 1992)*

Most of these lobbyists represent a broad range of for-profit and nonprofit entities: cities and towns; schools, colleges, and hospitals; insurance and health care companies; civil rights and charitable groups; business, trade, and professional associations; famous companies with global reach and obscure LLCs. Some of these relationships are excluded from the current rule.

**Under the current gift rule, it is virtually impossible for any public official to tell whether or how a particular lobbyist qualifies as an “interested person.”** Most lobbyists wear badges with their name and number but no information about their clients. Legislators have no way to tell whether that lobbyist or their clients may have “a direct financial interest” in their vote on a particular amendment or bill. If the lobbyist invites a legislator to dinner or a ball game, few could ask which client that lobbyist was representing or how much the event would cost.

**These former legislators whose lobbyist reports I reviewed are extraordinary in that they seldom testify or speak publicly on behalf of their clients.** Committee hearings in both the House and Senate typically involve scores of witnesses. Nearly all committees restrict the amount of time witnesses, including lobbyists, can testify. As a result, many witnesses speak in hearings and also provide detailed written testimony about their concerns. Written testimony documents submitted are available to the public in committee files.

I searched scores of legislative committee files for written testimony from these former legislators who are now lobbyists. Even with the help of ChatGPT and Gemini, I could not find written testimony with their names, although I did find several letters and some written testimony from a few of their clients.

These former legislators are skilled at public speaking, but they have adopted a practice of (1) mingling cordially with legislators at the State House, (2) meeting key lawmakers privately in offices, (3) attending many campaign fundraisers and contributing generously during the legislative session, (4) guiding their clients to submit occasional on-the-record testimony, but (5) largely concealing their specific lobbying objectives from the press and public.

By contrast, lobbyists for nonprofit organizations and advocates concerned about civil rights, health care, insurance, housing, taxes, and environmental issues testified frequently in person and often also in writing.

Throughout the legislative session, these nonprofit public advocates were deluged by invitations to campaign fundraisers at \$150 or \$200 per event that few can afford to attend.

**Regardless of their clients’ organizational structures, both kinds of lobbyists seek to influence public officials. Both have a substantial stake in the outcomes. I urge the Ethics Commission to recognize that the current gift rule creates an ethical gray area where enforcement of the gift rule is difficult or impossible. I urge the Ethics Commission to:**

- (1) Adopt the proposed rule that recognizes *all registered lobbyists and all the entities that pay them* as “interested persons,” regardless of their structure or contractual relationship;**
- (2) Reject the proposed amendment that would double the amounts of gifts that public officials can accept from lobbyists and their clients. Doubling the limit will only multiply opportunities for closeted conversations between professional lobbyists and decision makers on topics of great public interest.**

With thanks for your vital volunteer service on the Ethics Commission,



H. Philip West Jr.

## Fourteen lobbyists: Former legislators, their 2025 clients, reported compensation, campaign contributions

Assumption: Entities paying monthly paid only 6 months, even if whole year listed.

Formatting: Entities listed as paying on an annual basis are listed here in bold italics.

Others report monthly payments, multiplied here by 6-month session. Hourly compensation not computed.

Links: Click on underlined items to find the reports as filed on Secretary of State's website.

Lobbyist	Client entity hiring Lobbyist	Lobbying Firm/Lobbyists	Start	End	Rate	nnual Total	Lobbyist Totals
<b>STEVEN ALVES</b>							
	<a href="#">VISA U.S.A. INC.</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/2/25	12/31/25	\$60,000.00	60,000.00	
	<a href="#">SELF STORAGE ASSOCIATION</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/2/25	6/30/25	\$3,500.00	21,000.00	
	<a href="#">RHODE ISLAND LIBRARY ASSOC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/4/25	12/31/25	\$10,000.00	10,000.00	
	<a href="#">AUTO BODY ASSOCIATION OF RI</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$25,000.00	25,000.00	
	<a href="#">Fujifilm Holdings America Corporatio</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$5,000.00	30,000.00	
	<a href="#">J ARTHUR TRUDEAU CENTER</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$2,000.00	12,000.00	
	<a href="#">MEALS ON WHEELS OF RI. INC.</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$20,000.00	20,000.00	
	<a href="#">RI PAWNBROKERS ASSOCIATION</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$1,666.67	10,000.02	
	<a href="#">SIMS METALS MANAGEMENT</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	1,000.00	6,000.00	
	<a href="#">TURO</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$5,000.00	30,000.00	
	<a href="#">CARE NEW ENGLAND</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$10,000.00	60,000.00	
	<a href="#">The American Kratom Association</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/9/25	7/31/25	\$4,500.00	36,000.00	
	<a href="#">AFSCME RI Retirees Chapter 94</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/13/25	6/30/25	\$25,000.00	25,000.00	
	<a href="#">Veteran Benefits Guide</a>	<a href="#">CAPITOL STRATEGIES GR</a>	2/1/25	6/30/25	\$6,000.00	36,000.00	
	<a href="#">RHODE ISLAND DENTAL ASSOCIAC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	12/31/25	\$2,250.00	13,500.00	
	<a href="#">REVITY ENERGY LLC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	12/31/25	\$3,500.00	21,000.00	
	<a href="#">AXCESS FINANCIAL</a>	<a href="#">CAPITOL STRATEGIES GR</a>	3/4/25	6/30/25	\$5,000.00	5,000.00	
	<a href="#">RHODE ISLAND PUBLIC HEALTH I</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	12/31/25	\$2,000.00	12,000.00	
49 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:			\$10,475.00				\$ 432,500.02
<b>CHRISTOPHER BOYLE</b>							
	<a href="#">CONSTELLATION ENERGY GENE</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/1/25	12/31/25	\$3,000.00	18,000.00	
	<a href="#">FAMILY SERVICE RI</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/6/25	12/31/25	\$3,000.00	18,000.00	
	<a href="#">RHODE ISLAND TROOPERS ASSO</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/1/25	12/31/25	N/A		
	<a href="#">I3 BROADBAND</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/14/25	12/31/25	\$3,000.00	18,000.00	
	<a href="#">PROPANE GAS ASSOCIATION OF</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/14/25	12/31/25	\$2,500.00	15,000.00	
	<a href="#">RHODE ISLAND JUDICIARY</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/21/25	12/31/25	\$20,000.00	20,000.00	
	<a href="#">BLUE CROSS BLUE SHIELD OF R</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/20/25	12/31/25	\$5,500.00	33,000.00	
	<a href="#">AMERICAN TORT REFORM ASSO</a>	<a href="#">SERLIN HALEY LLP</a>	1/1/25	6/30/25	\$8,333.33	49,999.98	
	<a href="#">MTM, INC.</a>	<a href="#">SERLIN HALEY LLP</a>	1/1/25	6/30/25	\$8,000.00	48,000.00	
	<a href="#">TECHNOLOGY NETWORK AKA TE</a>	<a href="#">CHRISTOPHER BOYLE</a>	1/1/25	7/31/25	\$3,000.00	18,000.00	
32 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:			\$11,365.60				\$ 237,999.98
<b>DAVID CAPRIO</b>							
	<a href="#">CHILDREN'S FRIEND</a>	<a href="#">DAVID CAPRIO</a>	2/1/25	12/31/25	08.17 Hourly		
<b>GEORGE CARUOLO</b>							
	<a href="#">Brown University Health</a>	<a href="#">GEORGE CARUOLO</a>	1/6/25	12/31/25	\$4,500.00	27,000.00	
	<a href="#">GATEWAYS TO CHANGE</a>	<a href="#">GEORGE CARUOLO</a>	2/17/25	12/31/25	\$24,000.00	24,000.00	
6 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:			\$3,500.00				\$ 51,000.00
<b>David Cicilline</b>							
	<a href="#">RHODE ISLAND FOUNDATION</a>	<a href="#">David N. Cicilline</a>	1/10/25	12/31/25	500.00Hourly		
<b>JOHN DESIMONE</b>							
	<a href="#">jjd@desimonelaw.net</a>						
	<a href="#">PROVIDENCE TEACHERS UNION</a>	<a href="#">GOVERNMENT SOLUTION</a>	1/1/25	12/31/25	\$3,000.00	18,000.00	
20 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:			\$2,725.00				\$ 18,000.00
<b>ROBERT GOLDBERG</b>							
	<a href="#">IGT AND ITS AFFILIATES</a>	<a href="#">ROBERT GOLDBERG</a>	1/1/25	12/31/25	\$90,000.00	90,000.00	
	<a href="#">HUMANE WORLD FOR ANIMALS</a>	<a href="#">ROBERT GOLDBERG</a>	1/4/25	12/31/25	\$45,000.00	45,000.00	
	<a href="#">RHODE ISLAND LIQUOR OPERAT</a>	<a href="#">ROBERT GOLDBERG</a>	1/4/25	12/31/25	\$30,000.00	30,000.00	
	<a href="#">PROVIDENCE CHAMBER OF COM</a>	<a href="#">ROBERT GOLDBERG</a>	1/4/25	12/31/25	\$55,000.00	55,000.00	
	<a href="#">DISCOVERNEWPORT</a>	<a href="#">ROBERT GOLDBERG</a>	1/4/25	12/31/25	\$42,000.00	42,000.00	
	<a href="#">FEDEX CORPORATION</a>	<a href="#">ROBERT GOLDBERG</a>	1/4/25	12/31/25	\$6,500.00	39,000.00	

<a href="#">CVS HEALTH</a>	<a href="#">ROBERT GOLDBERG</a>	1/1/25	12/31/25	\$8,333.33	49,999.98
<a href="#">Brown University Health</a>	<a href="#">ROBERT GOLDBERG</a>	1/6/25	12/31/25	\$6,000.00	36,000.00
	<a href="#">ROBERT GOLDBERG</a>	7/21/25	12/31/25	\$5,000.00	5,000.00
<b>45 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$11,325.00</b>	<b>\$ 391,999.98</b>
<b>ROBERT JACQUARD</b>					
<a href="#">VISA U.S.A. INC.</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/2/25	3/18/25	\$60,000.00	60,000.00
<a href="#">SELF STORAGE ASSOCIATION</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/2/25	6/30/25	\$3,500.00	21,000.00
<a href="#">RHODE ISLAND LIBRARY ASSOC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/4/25	12/31/25	\$10,000.00	10,000.00
<a href="#">AUTO BODY ASSOCIATION OF RI</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$25,000.00	25,000.00
<a href="#">Fujifilm Holdings America Corporatio</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$5,000.00	30,000.00
<a href="#">J ARTHUR TRUDEAU CENTER</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	3/18/25	\$2,000.00	12,000.00
<a href="#">MEALS ON WHEELS OF RI, INC.</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$20,000.00	20,000.00
<a href="#">RI PAWNBROKERS ASSOCIATION</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	3/18/25	\$1,666.67	10,000.02
<a href="#">SIMS METALS MANAGEMENT</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	3/18/25	\$1,000.00	6,000.00
<a href="#">TURO</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	3/18/25	\$5,000.00	30,000.00
<a href="#">CARE NEW ENGLAND</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/8/25	12/31/25	\$10,000.00	60,000.00
<a href="#">The American Kratom Association</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/9/25	7/31/25	\$4,500.00	27,000.00
<a href="#">AFSCME RI Retirees Chapter 94</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/13/25	6/30/25	\$25,000.00	25,000.00
<a href="#">Veteran Benefits Guide</a>	<a href="#">CAPITOL STRATEGIES GR</a>	2/1/25	6/30/25	\$6,000.00	36,000.00
<a href="#">RHODE ISLAND DENTAL ASSOCIAC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	12/31/25	\$2,250.00	13,500.00
<a href="#">REVITY ENERGY LLC</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	3/18/25	\$3,500.00	21,000.00
<a href="#">AXCESS FINANCIAL</a>	<a href="#">CAPITOL STRATEGIES GR</a>	3/4/25	3/18/25	\$5,000.00	30,000.00
<a href="#">RHODE ISLAND PUBLIC HEALTH I</a>	<a href="#">CAPITOL STRATEGIES GR</a>	1/1/25	12/31/25	\$2,000.00	12,000.00
<b>5 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$ 950.00</b>	<b>\$ 448,500.02</b>
<b>DONALD LALLY</b>					
<a href="#">HAXTON'S TOLLGATE LIQUORS</a>	<a href="#">NARRAGANSETT CONSUL</a>	2/13/25	12/31/25	\$12,000.00	72,000.00
<a href="#">HAXTON'S TOLLGATE LIQUORS</a>	<a href="#">DONALD J LALLY</a>	1/1/25	12/31/25	\$12,000.00	72,000.00
<b>3 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$ 800.00</b>	<b>\$ 144,000.00</b>
<b>NICHOLAS MATTIELLO</b>					
<a href="#">Brown University Health</a>	<a href="#">WESTMINSTER CONSULTI</a>	1/27/25	12/31/25	\$2,000.00	12,000.00
<a href="#">Amos House</a>	<a href="#">WESTMINSTER CONSULTI</a>	3/13/25	12/31/25	/A Pro-Bono	
<b>2 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$ 700.00</b>	<b>\$ 12,000.00</b>
<b>WILLIAM J. MURPHY</b>					
<a href="#">Deere &amp; Company</a>	<a href="#">DOME CONSULTANTS, LL</a>	1/3/25	6/30/25	\$12,500	12,500.00
<a href="#">AMICA INSURANCE</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/8/25	12/31/25	\$4,000.00	24,000.00
<a href="#">WALMART INC.</a>	<a href="#">DOME CONSULTANTS, LL</a>	1/3/25	12/31/25	\$25,000	25,000.00
<a href="#">CNH INDUSTRIAL AMERICA LLC</a>	<a href="#">DOME CONSULTANTS, LL</a>	1/3/25	6/30/25	\$12,500	12,500.00
<a href="#">DELOITTE CONSULTING LLP</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/6/25	12/31/25	\$4,000	24,000.00
<a href="#">RI HEALTH AND EDUCATIONAL B</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/7/25	12/31/25	\$4,000	24,000.00
<a href="#">PURPOSE FINANCIAL, INC. (DBA</a>	<a href="#">DOME CONSULTANTS, LL</a>	1/7/25	12/31/25	\$30,000	30,000.00
<a href="#">RHODE ISLAND HEALTH CENTER</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/7/25	12/31/25	\$3,000	18,000.00
<a href="#">RHODE ISLAND MFG ASSOCIATIO</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/8/25	12/31/25	\$3,000	18,000.00
<a href="#">RHODE ISLAND ENERGY</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/8/25	12/31/25	\$5,000	30,000.00
<a href="#">CARE NEW ENGLAND</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/13/25	12/31/25	\$5,000	30,000.00
<a href="#">Cookware Sustainability Alliance c.o</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/14/25	4/30/25	\$5,000	30,000.00
<a href="#">BALLY'S CORPORATION</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/21/25	12/31/25	\$5,000	30,000.00
<a href="#">PHARMACEUTICAL RESEARCH A</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/21/25	12/31/25	\$5,000	30,000.00
<a href="#">Rhode Island Smoke Free Trade Or</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/21/25	12/31/25	\$3,000	18,000.00
<a href="#">RHODE ISLAND JUDICIARY</a>	<a href="#">DOME CONSULTANTS, LL</a>	1/24/25	12/31/25	\$20,000	20,000.00
<a href="#">ANHEUSER-BUSCH COMPANIES</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/24/25	12/31/25	\$3,333.33	19,999.98
<a href="#">THE PRESERVATION SOCIETY OF</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/24/25	12/31/25	\$3,333.33	19,999.98
<a href="#">RHODE ISLAND DENTAL ASSOCIAD</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/1/25	12/31/25	\$2,250	13,500.00
<a href="#">Rhode Island Philharmonic Orchestr</a>	<a href="#">DOME CONSULTANTS, LLC</a>	1/1/25	12/31/25	\$2,500	15,000.00
<a href="#">IQVIA obo MultiState Associates L</a>	<a href="#">DOME CONSULTANTS, LL</a>	2/26/25	12/31/25	\$20,250	20,250.00
<a href="#">Rhode Island Association of Aesth</a>	<a href="#">DOME CONSULTANTS, LL</a>	3/28/25	12/31/25	\$10,000	10,000.00
<b>33 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$14,450.00</b>	<b>\$ 474,749.96</b>
<b>TERESA WEED</b>					
<a href="#">DOORDASH, INC.</a>	<a href="#">F/S CAPITOL CONSULTING</a>	1/1/25	12/31/25	\$5,000.00	30,000.00
<a href="#">AMERICAN PROPERTY CA</a>	<a href="#">SUALT F/S CAPITOL CONSULTING</a>	1/1/25	12/31/25	\$50,000.00	50,000.00

<u>3M COMPANY</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/8/25</u>	<u>12/31/25</u>	<u>\$48,000.00</u>	<u>48,000.00</u>
<u>APPLE INC.</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$6,000.00</u>	<u>36,000.00</u>
<u>RHODE ISLAND FOOD DEALERS</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/10/25</u>	<u>12/31/25</u>	<u>\$3,631.25</u>	<u>21,787.50</u>
<u>CARVANA</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>CIGAR ASSOCIATION OF AMERIC</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$39,500.00</u>	<u>39,500.00</u>
<u>OPPF</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>RAI. SERVICES COMPANY</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$7,750.00</u>	<u>46,500.00</u>
<u>RHODE ISLAND BEVERAGE ASSO</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$80,400.00</u>	<u>80,400.00</u>
<u>RHODE ISLAND FARM BUREAU F</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$2,100.00</u>	<u>12,600.00</u>
<u>National Coalition For Assistive &amp; ReF/S</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/21/25</u>	<u>7/21/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>NATIONAL SHOOTING SPORTS F</u>	<u>F/S CAPITOL CONSULTING</u>	<u>2/7/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>CARFAX, INC.</u>	<u>F/S CAPITOL CONSULTING</u>	<u>2/24/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>NATURAL FIBERS ALLIANCE</u>	<u>F/S CAPITOL CONSULTING</u>	<u>3/4/25</u>	<u>8/15/25</u>	<u>\$4,000.00</u>	<u>24,000.00</u>
<u>ACADIA HEALTHCARE</u>	<u>F/S CAPITOL CONSULTING</u>	<u>1/1/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>American Wagering Inc.</u>	<u>F/S CAPITOL CONSULTING</u>	<u>5/8/25</u>	<u>12/31/25</u>	<u>\$7,000.00</u>	<u>42,000.00</u>
<u>Scout Motors</u>	<u>F/S CAPITOL CONSULTING</u>	<u>5/2/25</u>	<u>12/31/25</u>	<u>\$6,000.00</u>	<u>36,000.00</u>
<b>42 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$11,950.00</b>	<b>\$ 646,787.50</b>

<b>JOHN J. TASSONI</b>					
<u>SARGENT CENTER</u>	<u>JOHN J TASSONI</u>	<u>1/2/25</u>	<u>12/31/25</u>	<u>\$500.00</u>	<u>3,000.00</u>
<u>SUBSTANCE USE AND MENTAL H</u>	<u>JOHN J TASSONI</u>	<u>1/9/25</u>	<u>12/31/25</u>	<u>\$1,000.00</u>	<u>6,000.00</u>
<b>21 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$ 2,650.00</b>	<b>\$ 9,000.00</b>

<b>GEORGE ZAINYEH</b>					
<u>IGT AND ITS AFFILIATES</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$60,000.00</u>	<u>60,000.00</u>
<u>PURDUE PHARMA L.P.</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$4,000.00</u>	<u>24,000.00</u>
<u>DEMOCRACY LIVE, INC.</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$2,500.00</u>	<u>15,000.00</u>
<u>ALCOHOLIC BEVERAGE WHOLES</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>MAXIMUS</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>Regent Craft LLC</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$7,500.00</u>	<u>45,000.00</u>
<u>RI Short Term Rental Assoc</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/3/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>BRISTOL-MYERS SQUIBB COMPA</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/5/25</u>	<u>12/31/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>ACHIEVEMENT FIRST, INC.</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/5/25</u>	<u>12/31/25</u>	<u>\$1,750.00</u>	<u>10,500.00</u>
<u>BLACKSTONE VALLEY PREP MAY</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/5/25</u>	<u>12/31/25</u>	<u>\$1,750.00</u>	<u>10,500.00</u>
<u>FRIENDS OF EXCEL ACADEMY, I</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/5/25</u>	<u>12/31/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>NEW ENGLAND INSTITUTE OF TE</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/6/25</u>	<u>12/31/25</u>	<u>\$5,000.00</u>	<u>30,000.00</u>
<u>RHODE ISLAND TURNPIKE AND B</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/6/25</u>	<u>12/31/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>THE BEACON MUTUAL INS. CO.</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/6/25</u>	<u>12/31/25</u>	<u>\$4,166.66</u>	<u>24,999.96</u>
<u>HORIZON HEALTHCARE PARTNE</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/6/25</u>	<u>12/31/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>RHODE ISLAND SOCIETY FOR TH</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/7/25</u>	<u>12/31/25</u>	<u>\$10,000.00</u>	<u>60,000.00</u>
<u>Marquis Limited LLC</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/8/25</u>	<u>12/31/25</u>	<u>\$7,500.00</u>	<u>45,000.00</u>
<u>The Foundry Associates</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/9/25</u>	<u>12/31/25</u>	<u>\$7,500.00</u>	<u>45,000.00</u>
<u>City of Pawtucket Rhode Island</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>1/29/25</u>	<u>12/31/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>NEW VENTURE FUND</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>3/12/25</u>	<u>6/30/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>The American Society for the Preven</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>4/22/25</u>	<u>6/30/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>Veterinary Virtual Care Association</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>4/28/25</u>	<u>6/30/25</u>	<u>\$3,000.00</u>	<u>18,000.00</u>
<u>Cardiovascular Institute of New Engl</u>	<u>ATHENA SOLUTIONS GRO</u>	<u>8/22/25</u>	<u>12/31/25</u>	<u>\$7,000.00</u>	<u>42,000.00</u>
<b>49 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:</b>				<b>\$12,975.00</b>	<b>\$ 645,999.96</b>

Annual and monthly 2025 compensation reported for 14 former legislators who are now lobbyists: **\$3,512,537.42**  
Campaign contributions (1/1/25-6/30/25) reported by 14 former legislators who are now lobbyists: **\$ 83,865.60**

Spreadsheet in support of testimony by H. Philip West Jr on September 9, 2025,  
on 520-RICR-00-00-1.4.2 (36-14-5009)  
in support of amending the "interested person" in Sections C. and D,  
and in opposition to doubling gift limit in Section B.

hphilipwestjr@icloud.com  
www.secretsandscandals.com



## Depina, Sabrina (ETHICS)

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**From:** Patrick Lavery <patricklavery@gmail.com>  
**Sent:** Monday, September 8, 2025 6:06 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Hi, my name is Patrick Lavery, I live in Lincoln. I believe that all elected officials should be held to the highest of standards and we should be able to trust that they are always acting ethically and not beholden to any single entity.

I travel around the country from time to time and when I tell people I'm from Rhode Island, all too frequently, the response is "Oh, is that where you had that corrupt mayor?" and it's embarrassing. We need strong ethics rules and enforcement to not only ensure our elected officials are acting ethically but also to give trust to Rhode Islanders that it is happening. Many private industries have gift limits. Public school teachers are limited in what they can accept as gifts from their students. Imagine if a student who was struggling in a class showed up one day with an expensive gift for that teacher. Regardless of what the teacher does from that point forward, the impression has been given that there is an expectation in return for the student. Our public school teachers have limits in the \$10-25 range and in my opinion, elected officials should be held to at least this standard.

When a lobbyist gives a gift to an elected official, it is rare (or even non-existent) that there is some expectation of fair consideration in return. Again, even if there isn't, there will always be the impression from others that there is something shady happening, and that is exactly what we need to work to eliminate in Rhode Island. We need to have strong ethics and to eliminate as much as we can, even any impression of unethical elected officials.

Thank you for your consideration in this matter and I strongly urge you to update the language to limit the gift amount from all lobbyists, interested or otherwise.

Patrick Lavery  
78 Boulevard Ave  
Lincoln, RI



## Depina, Sabrina (ETHICS)

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**From:** Ethics Email  
**Sent:** Tuesday, September 9, 2025 11:33 AM  
**To:** Ethics Comments  
**Subject:** FW: Written Testimony – Response to Public Notice of Proposed Rulemaking  
**Attachments:** RI Ethics Commission Ltr 9.9.25.docx

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**From:** t.d.a. <smackkzzz@aol.com>  
**Sent:** Tuesday, September 9, 2025 11:29 AM  
**To:** Ethics Email <Ethics.Email@ethics.ri.gov>  
**Subject:** Written Testimony – Response to Public Notice of Proposed Rulemaking

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September 9, 2025

Subject: Written Testimony – Response to Public Notice of Proposed Rulemaking

Dear Members of the Rhode Island Ethics Commission,

Please find attached my written testimony submitted in response to the Public Notice of Proposed Rulemaking.

Thank you for the opportunity to provide input. Should you have any questions or require further information, I would be happy to assist.

Best regards,

Toni Akin  
86 Metcalf St.  
Providence, RI 02904

Ms. Toni Akin  
86 Metcalf St  
Providence, RI 02904  
Email: takin894@gmail.com  
Ph: 401-332-4930

Date: September 9, 2025

Rhode Island Ethics Commission  
40 Fountain Street, 8th Floor  
Providence, RI 02903  
Email: ethics.email@ethics.ri.gov

Subject: Public Comment on Proposed Rulemaking – Gift Limits and Definition of “Interested Person” to include Lobbyists

Dear Members of the Rhode Island Ethics Commission,

I am writing to formally submit my comments regarding the Commission’s proposed rulemaking notice, specifically addressing Items 1 and 2 related to the acceptance of gifts by public officials. As a concerned citizen, a public official in two New England states, and a member of a family with a long history of public servants—including teachers, law enforcement officers, advocates, and elected officials—I offer the following feedback in the spirit of strengthening public trust and maintaining high ethical standards in government.

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### **Item 1 – Opposition to Increasing the Gift Limit**

I respectfully oppose the proposed increase to the current \$25 gift limit for public officials from interested parties. This modest cap has been in place since 2005 and has appropriately served its purpose as a symbolic expression of appreciation—such as a coffee or sandwich—not as a conduit for influence.

To increase the limit to \$50 or beyond would be excessive. For context, \$50 represents over three hours of labor for a Rhode Islander earning minimum wage. For many working families, this amount is significant and cannot reasonably be characterized as a nominal or inconsequential gift. Public office is a public trust, and the people who hold these positions must remember that they themselves are the gift to their constituents. The focus should not be on receiving gifts, but on earning and maintaining the public’s trust.

There have even been estimates suggesting that if this increase is implemented and applied liberally, the cumulative value of gifts to a single official could potentially approach the

\$1M threshold in cumulative gift giving. Such a scenario, though hypothetical, underscores the risks associated with relaxing current limits.

If the Commission does move forward with this change, I would urge that any gifts received beyond the current \$25 threshold be publicly disclosed and donated to a charitable or public-interest cause to preserve the integrity of the office. However, I strongly advocate for maintaining the existing \$25 cap as both sufficient and appropriate as outlined above.

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## **Item 2 – Support for Prohibiting Gifts from Lobbyists and Their Employers**

I fully support the Commission's intent to uphold and enforce a clear prohibition against public officials accepting gifts from lobbyists and those who employ or retain them. This is a necessary and prudent measure to safeguard the integrity of government decision-making and to prevent the erosion of public confidence in our institutions.

At this pivotal moment, we have an opportunity to fortify ethical standards and reduce the undue influence of money in politics. Allowing any gifts—no matter how small—from individuals or entities actively seeking to shape public policy creates the perception, if not the reality, of compromised objectivity and favoritism.

This proposed restriction reinforces the fundamental principle that public office is a position of trust, not a transactional role subject to external persuasion. It sends a strong message to both the public and to those who engage with government that Rhode Island remains committed to impartial governance and ethical leadership.

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In conclusion, I urge the Commission to preserve the longstanding \$25 gift limit as an appropriate ethical safeguard and to move forward with firm restrictions on gifts from lobbyists and their employers. These measures are essential to ensuring that public officials serve the people of Rhode Island with integrity, fairness, and transparency.

Thank you for your consideration of my comments and for your continued work to uphold the ethical standards that are the foundation of effective public service.

Respectfully submitted,

Toni Akin

## Depina, Sabrina (ETHICS)

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**From:** liudvikas jagminas <ludi5@me.com>  
**Sent:** Wednesday, September 10, 2025 8:18 AM  
**To:** Ethics Email  
**Subject:** Gifts from lobbyists

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I am writing you to comment about the question whether Rhode Island elected officials should be allowed to receive gifts from lobbyists.

The simple answer is no.

It should be simple and clear that officials should not require gifts in order to do their jobs for which they are duly appointed or elected. Any type of gift is a potential conflict of interest and may influence their decision-making.

As a practicing physician, the AMA ethics statement forbids physicians from taking gifts from pharmaceutical companies as there have been studies that even small gifts may inadvertently influence physicians prescribing practices. So how is that any different for an elected official.

Cheers,  
Liudvikas Jagminas MD FACEP  
Pardon any typos & autocorrects  
Sent from my iPhone

## Depina, Sabrina (ETHICS)

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**From:** Joanne Rich <joanneprich@yahoo.com>  
**Sent:** Wednesday, September 10, 2025 5:08 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Ethics Commission,

My name is Joanne Rich. I live in Providence and, as a concerned citizen, I regularly testify at state house hearings and school committee meetings across the state about issues ranging from fair taxation, to RIPTA funding, to protecting trans youth and LGBTQ+ rights in general. I show up when the JNC is considering judge nominees who are clearly against the abortion rights laws on our books and to protest RI Energy's seemingly endless requests to raise rates. I'm retired and have a disability but I show up and give heartfelt testimony.

It is not only disheartening but also disgusting to me to know that some of the people who hear my testimony, putting on a straight face, are in the pocket of lobbyists who are able to take advantage of the loophole allowing unlimited gifts in certain circumstances. That is corruption, plain and simple. There should be strict limits to the gifts that ALL RI public officials can accept from ANY lobbyist and those who employ them.

Thank you for considering my comments, which I submit in growing anxiety about the corruption in Washington and the hope that Rhode Island will not follow suit. I urge you to adopt the Common Cause RI language to close the loophole.

Sincerely,

Joanne Rich  
234 Morris Ave  
Providence, RI 02906

## Depina, Sabrina (ETHICS)

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**From:** Houllahan <tehoullahan@gmail.com>  
**Sent:** Thursday, September 11, 2025 9:05 AM  
**To:** Ethics Comments  
**Subject:** From Roberta Houllahan tehoullahan@gmail.com Friday, August 29, 2025 10:10 AM Ethics Comments Comments on proposed changes to 520-RICR-00-00-1.4.2

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from: Roberta Houllahan [tehoullahan@gmail.com](mailto:tehoullahan@gmail.com)  
Thursday, Sept 11, 2025 10:10  
Ethics Comments Comments on proposed changes to 520-RICR-00-00-1.4.2

Dear Chair Jones and Honorable Commissioners:

My name is Roberta Houllahan, and I'm a Providence resident. While important strides have been made in recent decades, ethical government in Rhode Island is an ongoing project. I thank each of the Commissioners for their work on it.

*One simple but important step we can take in that ongoing project is to limit the gifts elected officials and public employees can accept from lobbyists.* It was actually a surprise to me to learn recently that this lobbying loophole still exists. I think it would shock most Rhode Islanders to know it, and contribute to their existing lack of trust in state government. Lobbying has plenty of influence in our state (and nation) without the added problem of gift giving on top of it. Let's fix that.

I encourage the Commissioners to take the sensible step to promptly close the lobbyist gift loophole by adopting the language Common Cause Rhode Island has proposed.

Thank you very much for considering my input.

Roberta Hooullahan  
627 Hope Street  
Providence RI 02906

## Depina, Sabrina (ETHICS)

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**From:** Judith Newburn Slane <js4862@nyu.edu>  
**Sent:** Thursday, September 11, 2025 11:03 AM  
**To:** Ethics Comments

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**From: Judith Slane : [js4862@nyu.edu](mailto:js4862@nyu.edu)**

Thursday 9/11/2025, 10:10 AM

Ethics Comments

Comments on proposed changes to 520-RICR-00-00-1.4.2

Dear Chair Jones and Honorable Commissioners:

My name is Judith Slane, and I'm a Barrington resident. While important strides have been made in recent decades, ethical government in Rhode Island is an ongoing project. I thank each of the Commissioners for their work on it.

One simple but important step we can take in that ongoing project is to limit the gifts elected officials and public employees can accept from lobbyists. It was actually a surprise to me to learn recently that this lobbying loophole still exists. I think it would shock most Rhode Islanders to know it, and contribute to their existing lack of trust in state government. Lobbying has plenty of influence in our state (and nation) without the added problem of gift giving on top of it. Let's fix that.

I encourage the Commissioners to take the sensible step to promptly close the lobbyist gift loophole by adopting the language Common Cause Rhode Island has proposed. Thank you very much for considering my input.

Sincerely,  
Judith Slane  
16 Winsor Drive  
Barrington, RI 02806



## Depina, Sabrina (ETHICS)

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**From:** Suzanne Craig <sbcpx@cox.net>  
**Sent:** Thursday, September 11, 2025 1:54 PM  
**To:** Ethics Comments  
**Subject:** Notice of Proposed Rulemaking

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Dear Chair Jones and Honorable Commissioners:

My name is Suzanne Craig, and I'm an East Providence resident. While important strides have been made in recent decades, ethical government in Rhode Island is an ongoing project. Thanks to each of the **Commissioners for their work on it.**

One simple but important step we can take in that ongoing project is to limit the gifts elected officials and public employees can accept from lobbyists. It was a surprise to me to learn recently that this lobbying loophole still exists. I think it would shock most Rhode Islanders to know it and contribute to their existing lack of trust in state government. Lobbying has plenty of influence in our state (and nation) without the added problem of gift giving on top of it. Let's fix that.

I encourage the Commissioners to take the sensible step to promptly close the lobbyist gift loophole by adopting the language Common Cause Rhode Island has proposed. Thank you very much for considering my input.

Sincerely,  
Suzanne Craig  
22 Village Drive  
Riverside, RI 02915  
sbcpx@cox.net

## Depina, Sabrina (ETHICS)

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**From:** Marianna LaTour <mlatour6@gmail.com>  
**Sent:** Friday, September 12, 2025 8:46 PM  
**To:** Ethics Comments  
**Subject:** Lobbyist gifts

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It is essential that you limit gifts from lobbyists to legislators immediately. We will carefully record how each of you vote on this Important issue in our state.

Best Regards, Marianna LaTour

## Depina, Sabrina (ETHICS)

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**From:** Shawn Selleck <selleck@gmail.com>  
**Sent:** Sunday, September 14, 2025 9:30 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Ethics Commission,

My name is Shawn Selleck and I'm a resident of Providence, RI. I've been directly working to improve transparency in Rhode Island for over a decade, having implemented the first Open Meetings Portal for the City of Providence in 2013-14 and having served as its City Clerk five years later, where I personally handled lobbyist registration for the City. Ethical government is imperative for our democracy and transparency is an important component.

Public officials expend a significant amount of time and resources managing lobbyist registration to prevent (as much as possible) unfair influence by those who are being compensated for their time spent lobbying our elected officials. Part of that prevention includes the prohibition of gifts from lobbyists that exceed a minimal value. The spirit of the law preventing such gifts is so that gifts of value are never given to influence a public official. The loophole that currently exists, however, does not prevent such gifts from being received by a public official if they are given by a party that won't "directly benefit." By simply adding a single layer of labor between an elected official and an organization directly benefiting from legislation, it seems this law can be bypassed, and renders the law toothless in the face of unscrupulous actors.

I thank the Ethics Commission for recognizing this loophole and I hope that it recognizes that there are thousands of Rhode Islanders that understand how important it is to have it closed and a million Rhode Islanders that will benefit from having it closed. **Please adopt the proposed amendment to the definition of "interested person" to include lobbyists.** However, the current limits of \$25 per gift and \$75 aggregate are doing their job effectively, and **I urge you to reject the amendment adjusting existing limits on gifts.** Thank you, sincerely, for your time and consideration.

Regards,

Shawn Selleck  
138 Messer Street  
Providence, RI 02909

## Depina, Sabrina (ETHICS)

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**From:** Bonnie Epstein <bepstein@rimosa.org>  
**Sent:** Monday, September 15, 2025 11:54 AM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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To the Rhode Island Ethics Commission,

I came to Rhode Island from Massachusetts in 1990 to go to college, met a local guy and ended up staying here and raising native Rhode Islanders. When I first came to RI, political corruption was seen as sort of a given/ running joke in the state. But I have seen RI clean up its image, and become, with most of our neighboring North-East states, a beacon of hope in the flaming dumpster of authoritarianism, corruption and solipsism that is the Trump Administration.

It is because of the general feeling of corruption at the federal level that I urge our state to be even more ethical. To show how government can be. I was gratified to hear that legislators cannot accept gifts from those who might benefit from their lawmaking - but I was surprised and dismayed to find that lobbyists are exempt from that gift cap! The entire job of a lobbyist is to influence public officials and employees on behalf of others. Even though, under the current definition, lobbyists don't financially benefit from what they are lobbying about (they are paid either way), there is no doubt that a lobbyist who is more effective at bending public officials to their will, will get more jobs or be able to charge higher rates. So they do benefit if their gifts succeed in changing people's minds. And there is also ample evidence that people receiving gifts are more likely to view the gift-giver (and whatever they have to say) more positively. This does not seem in the spirit of ethical governing.

I very much appreciate the time the Ethics Commission has taken to consider this issue and to read my comments. I hope my impassioned plea has helped persuade you to make the necessary changes to the law so that the spirit of ethics will match what is written. At least if you don't agree, I will know it is because you considered the voices of regular Rhode Islanders, and not just those with the means to hire lobbyists with expense accounts.

Thanks again,  
Bonnie Epstein Silverman  
60 Charlotte Ave  
Saunderstown, RI 02874

## Depina, Sabrina (ETHICS)

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**From:** Mildred Nichols <mildred.nichols5@gmail.com>  
**Sent:** Monday, September 15, 2025 12:39 PM  
**To:** Ethics Comments  
**Subject:** Comments on Proposed Changes to 520-RICR-00-00-1.4.2

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Dear Chair Jones and Honorable Commissioners:

My name is Mildred Nichols. I live in Providence.

I urge you to close any and all loopholes in Rhode Island law or customs that allow professional lobbyists to give gifts to legislators and other public officials. We all know there appears to be a link between Rhode Island's sky high payday short term interest rates and the failure to charge a deposit on plastic bottles and professional lobbying and gifts to legislators and other public officials.

Please serve all Rhode Islanders. Close the loopholes. I thank you.

Sincerely,  
Mildred Nichols

## Depina, Sabrina (ETHICS)

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**From:** Paula on Lenox <paula.on.lenox@gmail.com>  
**Sent:** Monday, September 15, 2025 7:38 PM  
**To:** Ethics Comments  
**Subject:** Comments on proposed changes to 520-RICR-00-00-1.4.2

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Dear Commissioners:

I am a long term resident of the Southside of Providence, and a recent retiree. I worked for 50+ years in various industries including law firms, non-profits, small businesses as well as for a multinational corporation. I am also very active in my local community. I believe it is of the upmost importance to be an active participant in the democratic process to ensure that all voices are heard, which is why I am writing this letter regarding proposed changes regarding gifts that public officials and employees can take from all lobbyists and all people who employ lobbyists.

Why I believe the RI Ethics Commission must to continue its important work by closing the "Lobbyist Loophole":

- Rhode Islanders want an ethical government and the Ethics Commission plays a crucial role to ensure our government operates at the highest ethical standard. This is especially necessary in such a small state.
- A person's role as a public official or governmental employee must not be used for private gain. If a public official or employee takes gifts from people trying to influence them, they are receiving a private gain because of their public position.
- Rhode Island needs strict limits on gifts that public officials and employees can take from those trying to influence their decisions.
- Lobbyists, by definition, are trying to influence public officials and employees, regardless of whether they stand to financially benefit from the issue for which they are lobbying. Therefore, the Ethics Commission needs to limit gifts from all lobbyists, and those employing lobbyists. Below are some examples of the issues involving lobbyists:
  - Legislators shouldn't be able to take unlimited gifts from a chamber of commerce lobbyist before voting on a bill to lower corporate tax rates.
  - Members of the State Board of Education shouldn't be able to take unlimited gifts from a lobbyist of an education advocacy non-profit pushing charter school expansion.
  - Members of the Ethics Commission shouldn't be able to take unlimited gifts from the lobbyist for Common Cause Rhode Island before voting on whether to close the "Lobbyist Loophole!"

Therefore, I respectfully request that the Ethics Commission adopt the Common Cause Rhode Island language to close the lobbyist loophole. Please rule in favor of changing the gift rule to expressly prohibit expensive gifts from all lobbyists, whether or not they have a direct financial interest in a specific decision, to the public officials they are lobbying. All gifts must be limited from all lobbyists and those who employ them, regardless of whether the lobbyists or their clients' interests are financial or policy-based. Strengthening the ethical standards by which our government operates is crucial to good democracy.

Sincerely,

Paula Donovan

67 Lenox Avenue

Providence, RI 02907

## Depina, Sabrina (ETHICS)

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**From:** Lisa Beade <llr7071@gmail.com>  
**Sent:** Wednesday, September 17, 2025 8:22 AM  
**To:** Ethics Comments  
**Subject:** Proposed changes to gifting limits

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Chairman Jones and honorable members of the Ethics Commission :

My name is Lisa Roseman Beade and I have been living in RI for the last 45 years. But for the last 9 months I have been in Providence at Wingate on the Eastside.

Yesterday, I had a most interesting conversation at lunch about Lincoln Steffens' 1904 muckraking article "RI a state for Sale" and RI's history of corruption and its ongoing legacy.

120 years later, much has changed, due to the incredibly hard work of a few principled people working for transparency in government and in the public good, including the incredibly hard work setting up of this commission.

But how does one explain to politically untutored citizens, including me recently, that the State Ethics Commission will be looking into the ethics of raising the gift limit of lobbyists to people holding public office?

"Wait, wait, wait", one of my lunch companions asked- "what did you say??? Isn't any gift giving by anyone to politicians unethical??? Isn't an Ethics Commission voting on that the in-life equivalent of an oxymoron?"

You get the idea....

Commission members, the degree of corruption this state operates under should not be under consideration. Any gift, in any kind, to any elected office holder and, by extension policymaker, should never be sanctioned by anyone, least of all by a commission appointed to oversee ethics in government. Otherwise we continue to be a state for sale.

Very sincerely yours,

Lisa Beade  
[LRBeade@gmail.com](mailto:LRBeade@gmail.com)



State of Rhode Island

SENATOR  
**DAWN EUER**  
District 13

Room 308  
Rhode Island State House  
Providence, Rhode Island 02903

OFFICE: 401-276-5561

sen-euer@rilegislature.gov



Senate Chamber

Committee on  
Judiciary

Committee on  
Special Legislation &  
Veterans' Affairs

Committee on Rules,  
Government Ethics & Oversight

September 15, 2025

Jason Gramittt, Director  
Rhode Island Ethics Commission  
40 Fountain Street, 8th Floor  
Providence, RI 02903  
Ethics.comment@ethics.ri.gov

Dear Director Gramitt & Members of the Rhode Island Ethics Commission,

Thank you for your service to Rhode Island. Your role providing independent oversight is critical to maintaining accountability and transparency in government. The authority to adopt a code of ethics and promulgate rules governing the ethical conduct of all public officials properly rests with the Commission and not the legislature. That independence, and the public's trust in it, is a cornerstone of good governance in our state.

Given the opportunity for public comment, I write today to respectfully oppose the Commission's proposal to increase the gift limit from \$25 to \$50. I recognize that periodic rule reviews are appropriate and the change from \$25 to \$50 may seem like a minor and inconsequential change. However, I believe this proposed change moves us in the wrong direction at a time when public confidence in elected officials and public institutions is already extremely low. Rhode Island has a long and well-documented history of ethics reforms, born in part from past failures that demanded real and meaningful change. In that spirit, we must continue moving toward stronger, not looser, ethical safeguards.

The current \$25 gift limit, as defined in 520-RICR-00-00-1.4.2, is already seen by many in the public as a compromise. In fact, if asked, I believe most Rhode Islanders would say the limit should be zero. Any increase, no matter how incremental, risks undermining public trust and reinforcing the perception that small favors or gifts could influence official behavior.

Moreover, as the Commission's own Director has noted on several occasions, the current limit is one of the most easily understood and enforced rules in the ethics code. Raising it to \$50 sends the wrong message. Simplicity and clarity are strengths when it comes to ethical rules, and they should not be sacrificed for marginal changes that may benefit a few but erode confidence among many.

I urge the Commission to maintain the \$25 gift limit or eliminate this loophole altogether. Thank you again for your service and for your thoughtful consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Dawn Euer", written over a horizontal line.

**Senator Dawn Euer**  
Rhode Island State Senate, District 13