



STATE OF RHODE ISLAND
RHODE ISLAND ETHICS COMMISSION
40 Fountain Street
Providence, RI 02903
(401) 222-3790 (Voice/TT)
Email: ethics.email@ethics.ri.gov
Website: <https://ethics.ri.gov>

NOTICE OF OPEN MEETING

DATE:	Tuesday, November 18, 2025
TIME:	9:00 a.m.
PLACE:	Rhode Island Ethics Commission Hearing Room – 8 th Floor 40 Fountain Street Providence, RI 02903
LIVESTREAM:	<p>The Open Session portions of this meeting will be livestreamed at:</p> <p>https://us02web.zoom.us/j/82404579165</p> <p>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.</p>



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AGENDA

16th Meeting

1. Call to Order.
2. Motion to approve minutes of Open Session held on October 21, 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.) Olinda Lissette Suchite-Mendez, the former minority business support director for the Rhode Island Commerce Corporation, who is now privately employed as a small business services administrator with Skills for Rhode Island's Future, requests an advisory opinion regarding whether she may, within one year following the severance of her position with the Commerce Corporation, attend and participate in meetings with business owners who might be interested in working with Skills for Rhode Island's Future, given that those meetings are held at and hosted by the Commerce Corporation and, if so, whether and how the revolving door provisions of the Code of Ethics might otherwise apply to her current private employment. [Staff Attorney Radiches]
 - b.) Ronald P. Flynn, a member of the Coventry Planning Commission, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from participating in discussions and decision-making relative to a matter currently pending before the planning commission, given that the applicant

in the matter was hired by the Petitioner to construct the Petitioner's personal residence, a project that was completed in 2021. [Staff Attorney Radiches]

- c.) Jeffrey Wolfsberg, an administrator at the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities & Hospitals, requests an advisory opinion regarding whether the Code of Ethics prohibits him from accepting private, part-time employment as a recovery coach/peer support specialist with Tipping Point Recovery, an addiction recovery intervention company. [Staff Attorney Papa]
- d.) Raymond Taylor, the supervisor of the Onsite Wastewater Treatment Systems (OWTS) program within the Rhode Island Department of Environmental Management (RIDEM), requests an advisory opinion regarding whether he qualifies for a hardship exception to the Code of Ethics' prohibition against representing himself before the RIDEM's Freshwater Wetlands program in order to seek approval of site plan application relative to the construction of a detached, two-car garage structure and a small dock at his personal residence, and whether he may engage the services of a land surveyor who is licensed by the OWTS program as a septic designer and, if so, what restrictions, if any, the Code of Ethics imposes upon the Petitioner. [Staff Attorney Papa]
- e.) Peter W. Meusert, a member of the Scituate Town Council who in his private capacity is a volunteer firefighter with the North Scituate Fire Department No.1, a private, non-profit organization, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from participating, as a town council member, in discussions between the town council and the fire department relative to complaints received by town council members regarding the operation of the fire department. [Staff Attorney Papa]

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

- a.) Motion to approve minutes of Executive Session held on October 21, 2025, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- b.) In re: Heidi Weston Rogers, Complaint No. 2024-12, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- c.) In re: James Durkin, Complaint No. 2025-4, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).
- d.) In re: Jonathan Pascua, Complaint No. 2025-2, pursuant to R.I. Gen. Laws § 42-46-5(a)(2) & (4).

- e.) Motion to return to Open Session.
- 6. Motion to seal minutes of Executive Session held on November 18, 2025.
- 7. Report on actions taken in Executive Session.
- 8. Election of Officers.
- 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 November 13, 2025

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: November 18, 2025

Re: Olinda Lissette Suchite-Mendez

QUESTION PRESENTED:

The Petitioner, the former minority business support director for the Rhode Island Commerce Corporation, a quasi-public state employee position, who is now privately employed as a small business services administrator with Skills for Rhode Island's Future, requests an advisory opinion regarding whether she may, within one year following the severance of her position with the Commerce Corporation, attend and participate in meetings with business owners who might be interested in working with Skills for Rhode Island's Future, given that those meetings are held at and hosted by the Commerce Corporation and, if so, whether and how the revolving door provisions of the Code of Ethics might otherwise apply to her current private employment.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, the former minority support director for the Rhode Island Commerce Corporation, a quasi-public state employee position, who is now privately employed as a small business services administrator with Skills for Rhode Island's Future, may, within one year following the severance of her position with the Commerce Corporation, attend and participate in meetings with business owners who might be interested in working with Skills for Rhode Island's Future, notwithstanding that those meetings are held at and hosted by the Commerce Corporation. The Petitioner is advised to follow any other guidance as outlined herein relative to application of the revolving door provisions of the Code of Ethics during the one-year period following the severance of her position with the Commerce Corporation.

The Petitioner states that she was employed by the Rhode Island Commerce Corporation as its minority business support director from February 2023 until June 2025. She further states that her employment with the Commerce Corporation ended due to the expiration of American Rescue Plan Act funding that supported her role. The Petitioner identifies among her former duties at the Commerce Corporation the following: managing relationships with technical assistance partners engaged by the Commerce Corporation to support minority- and women-owned business enterprises; promoting awareness of available federal and

state grant and assistance programs; assisting in the development of parameters, metrics, and structures for the Minority Business Accelerator grant program; reporting on program outcomes and representing the Commerce Corporation at stakeholder events; and administering and monitoring grants to external organizations.

The Petitioner states that in September 2025, three months after her public employment with the Commerce Corporation ended, she accepted an offer of private employment from Skills for Rhode Island's Future (SkillsRI) as a small business administrator within the Rhode Island Small Business Hub. The Petitioner identifies among her current duties at SkillsRI the following: overseeing strategy implementation and internal coordination among program coordinators supporting small business clients; guiding small businesses through governmental procurement and public contracting systems; providing direct services to small businesses, including technical assistance in certification readiness, procurement navigation, and access to capital through private lenders, community development financial institutions, and other municipal and state programs; and supporting the Small Business Opportunity Program (SBOP).¹

The Petitioner represents that her current work for SkillsRI is distinct in both function and purpose from her former work for the Commerce Corporation. She explains that her current position is direct-service oriented and focuses on helping small businesses access capital and funding. The Petitioner states that these activities are unrelated to those involving Minority Business Enterprise (MBE) certification administration or grant award management with which she was tasked during her employment with the Commerce Corporation. The Petitioner informs that SkillsRI was a grantee under the Commerce Corporation's MBE program which the Petitioner administered and monitored while employed by the Commerce Corporation. She emphasizes, however, that she has no role in the additional pursuit by SkillsRI of such grant funding, nor would such activity fall within her duties at SkillsRI.

The Petitioner states that local business owners seeking support from the Office of the Governor are regularly referred by that office to the Commerce Corporation for assistance. The Petitioner further states that, in response to an inquiry from such a business owner, a representative from the Commerce Corporation ordinarily will invite that business owner to a meeting at the Commerce Corporation, at which time the Commerce Corporation will inform the business owner of what services the Commerce Corporation can offer. The Petitioner explains that the Commerce Corporation also maintains a list of approximately 15 agencies that offer services to local business owners that the Commerce Corporation does not offer and will regularly invite those other agencies to attend and participate in these meetings.

¹ The Petitioner describes SBOP as a federally funded initiative administered by the Commerce Corporation, with SkillsRI serving as a sub-awardee under a U.S. Department of Treasury grant.

The Petitioner states that at these meetings with business owners, following an introduction by both the Commerce Corporation's director of outreach and engagement and its small business liaison regarding what the Commerce Corporation has to offer by way of assistance, representatives from the agencies who accepted the invitation to attend and participate in the meeting then relay to the business owner what opportunities their agencies have to offer. The Petitioner explains that topics of discussion at these meetings consist of improvement of access to capital for small businesses, including coordination with private banks, community development financial institutions, and municipal partners. The Petitioner explains that a business owner is free to select an agency to work with, if it so chooses, without any input from the Commerce Corporation. She further explains that the Commerce Corporation does not charge a fee to, or compensate, any agency for its participation in a meeting with a business owner; nor does the Commerce Corporation endorse or denounce a presentation by any agency to a business owner.

The Petitioner states that her duties at SkillsRI include attendance and participation at these meetings on behalf of SkillsRI. She further states that her participation in these meetings has no direct financial impact on her or SkillsRI, including the receipt or denial of grant funding from the Commerce Corporation or any other source. It is under this set of facts that the Petitioner seeks guidance from the Ethics Commission regarding whether she may, at this time, attend and participate in the above-described meetings and, if so, whether and how the revolving door provisions of the Code of Ethics might otherwise apply to her current private employment.

The Code of Ethics prohibits a public employee from representing herself or any other person before any state agency by which she is employed. R.I. Gen. Laws § 36-14-5(e)(1) & (2). This prohibition extends for a period of one year after the public employee has officially severed her position with the agency. § 36-14-5(e)(4). The "revolving door" language of § 36-14-5(e) is designed to prevent any undue influence that a current or recently departed employee may have over the agency and colleagues with which she works, or worked. Under the Code of Ethics, a person represents herself or another person before a state agency if she participates in the presentation of evidence or arguments before that agency for the purpose of influencing the judgment of the agency in her own favor or in favor of another person. § 36-14-2(12) & (13); 520-RICR-00-00-1.1.4 Representing Oneself or Others, Defined (36-14-5016). A "person" is defined as an individual or business entity. R.I. Gen. Laws § 36-14-2(7). Additionally, R.I. Gen. Laws § 36-14-5(c) prohibits the use and/or disclosure of confidential information received through one's public employment for pecuniary gain.

The prohibitions within § 36-14-5(e) are absolute and apply to the entire agency, including all of its offices, sections, programs or divisions. See, e.g., A.O. 2020-7 (opining that the chief civil engineer of the Transportation Planning Division of the Rhode Island Department of Transportation (RIDOT) was prohibited by the Code of Ethics from preparing plans bearing his signature as the consulting engineer to be submitted by a private

client to RIDOT, including any separate divisions thereof or entities therein, while he was employed by RIDOT and for a period of one year thereafter). Therefore, for purposes of this advisory opinion and the Ethics Commission's determination of the applicability of the relevant sections of the Code of Ethics, the Petitioner's former public employment with the Commerce Corporation will encompass each of the departments, offices, sections, programs or divisions within that state agency.

The Ethics Commission has issued numerous advisory opinions interpreting § 36-14-5 (e)(4)'s requirements with respect to former state employees interacting with their former agencies during the one-year period following the severance of their state employment. For example, the Ethics Commission issued Advisory Opinion 2020-32 to the former senior projects review coordinator for the Rhode Island Historical Preservation & Heritage Commission, opining that he was prohibited from representing himself or others, including his private employer, or from acting as an expert witness, before that commission until the expiration of one year following the date of severance from his state employment. That petitioner was further prohibited from using or disclosing any confidential information he obtained while working as the senior projects review coordinator to financially benefit himself or his private employer. See also A.O. 2017-34 (opining that a former principal civil engineer in the Bridge Design Section of the Rhode Island Department of Transportation (RIDOT), while not prohibited from working for a private engineering firm upon his retirement, was prohibited by the Code of Ethics from representing himself or others, including his new private employer, or from acting as an expert witness, before RIDOT for a period of one year following the date of severance from his state employment, and from using any confidential information he obtained while working for RIDOT for financial gain).

Activities that would constitute representation and/or acting as an expert generally include the presentation of information or arguments for the purpose of influencing the judgment of the agency on matters concerning the Petitioner and/or her new employer. Such prohibited activities include, but are not limited to, signing any responses to requests for proposals issued by the Commerce Corporation or any of its departments, and/or attending and participating in meetings between SkillsRI and the Commerce Corporation or any of its departments relative to the award of a contract or grant to SkillsRI. The Petitioner is cautioned that prohibited interactions are not limited to business meetings, and could occur at a restaurant, on the phone, in an email, or at any social or political gathering. It is the content of a discussion, rather than its venue, that is most relevant in applying the Code of Ethics' post-employment revolving door restrictions. On the other hand, contacts involving purely personal or ministerial matters that do not involve discretion or decision-making on the part of the Commerce Corporation or any of its departments are not prohibited.

Here, based upon the facts as represented, it is the opinion of the Ethics Commission that the Petitioner's proposed activity at meetings with business owners potentially seeking assistance from SkillsRI does not appear to violate the revolving door provisions of § 36-

14-5(e). Compare A.O. 2020-6 (opining that the vice president of business development at the Commerce Corporation was prohibited by the Code of Ethics from representing himself or his anticipated new private employer before the Commerce Corporation until the expiration of one year after the petitioner had officially severed his public employment including, but not limited to, serving as a liaison between his new employer and the Commerce Corporation relative to the new employer's adherence to a memorandum of understanding relating to a project in which the petitioner had been heavily involved while employed by the Commerce Corporation). The Petitioner is advised, however, that in consideration of the applicable provisions of the Code of Ethics, and consistent with our past advisory opinions addressing this issue, she is prohibited by the Code of Ethics from representing herself or others, including her new private employer, or from acting as an expert witness, before the Commerce Corporation and any of its departments, offices, sections, programs or divisions for a period of one year following the severance of her employment with that agency. Further, the Petitioner may not use any confidential information she obtained while working for the Commerce Corporation to obtain financial gain for herself or her new employer. Lastly, until the expiration of one year following the date of her departure from state service, the Petitioner is advised, when in doubt, to seek further guidance from the Ethics Commission regarding the Code of Ethics' potential application to her interactions with the Commerce Corporation.

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(7)

§ 36-14-2(12)

§ 36-14-2(13)

§ 36-14-5(c)

§ 36-14-5(e)

520-RICR-00-00-1.1.4 Representing Oneself or Others, Defined (36-14-5016)

Related Advisory Opinions:

A.O. 2020-32

A.O. 2020-6
A.O. 2017-34

Keywords:

Post Employment

Private Employment

Revolving Door

DRAFT

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: November 18, 2025

Re: Ronald P. Flynn

QUESTION PRESENTED:

The Petitioner, a member of the Coventry Planning Commission, a municipal appointed position, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from participating in discussions and decision-making relative to a matter currently pending before the planning commission, given that the applicant in the matter was hired by the Petitioner to construct the Petitioner's personal residence, a project that was completed in 2021.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, a member of the Coventry Planning Commission, a municipal appointed position, is not prohibited by the Code of Ethics from participating in discussions and decision-making relative to a matter currently pending before the planning commission, notwithstanding that the applicant in the matter was hired by the Petitioner to construct the Petitioner's personal residence, a project that was completed in 2021.

The Petitioner is a member of the Coventry Planning Commission, to which he was appointed by the Coventry Town Council in 2007. He states that he has served continuously since that time and has chaired the planning commission for the last five years. The Petitioner informs that currently pending before the planning commission is a preliminary comprehensive plan application for affordable housing that is scheduled for hearing on November 19, 2025. The Petitioner identifies the applicant as Bob DeBlois, the founder and president of D2 Homes.¹ The Petitioner represents that on June 1, 2021, he contracted with Mr. DeBlois to construct a new personal residence for the Petitioner and his family. The Petitioner further represents that for the duration of his contract with Mr. DeBlois, he recused from all planning commission matters involving Mr. DeBlois and/or from all matters in which Mr. DeBlois was a party or participant. The Petitioner states that his home was completed in 2021 and that his final payment to Mr. DeBlois was received by Mr. DeBlois on November 18, 2021. The Petitioner informs that he has had no professional

¹ All references to Mr. DeBlois in this advisory opinion also include D2 Homes.

relationship with Mr. DeBlois since 2021 and, despite his satisfaction with the work that was performed for him, he does not anticipate any occasion for which he might again require the services of Mr. DeBlois going forward. It is in the context of these facts that the Petitioner seeks advice from the Ethics Commission regarding whether he is prohibited from participating in the matter currently before the planning commission and for which Mr. DeBlois is the applicant.

Under the Code of Ethics, a public official may not participate in any matter in which he has an interest, financial or otherwise, that it 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 substantial conflict of interest exists if an official has reason to believe or expect that he, any person within his family, his business associate, or any business by which he is employed or which he represents, will derive a direct monetary gain or suffer a direct monetary loss by reason of his official activity. R.I. Gen. Laws § 36-14-7(a). A business associate is defined as “a person joined together with another person to achieve a common financial objective.” R.I. Gen. Laws § 36-14-2(3). A person is defined as “an individual or a business entity.” § 36-14-2(7). Additionally, a public official must recuse himself from participation in a matter when his business associate, or a person authorized by his business associate, appears or presents evidence or arguments before his municipal agency. 520-RICR-00-00-1.2.1(A)(2)&(3) Additional Circumstances Warranting Recusal (36-14-5002). Finally, the Code of Ethics prohibits a public official from using his public office or confidential information received through his public office to obtain financial gain for himself, his family, his business associate, or any business by which he is employed or which she represents. § 36-14-5(d).

In past advisory opinions, the Ethics Commission has required a public official to recuse from consideration of a matter if it impacted an individual or entity with which the official had an ongoing business relationship, or if such an individual or entity appeared before the official’s public body. See A.O. 2016-45 (opining that a member of the Tiverton Planning Board was prohibited from participating in the planning board’s discussions and voting relative to a matter in which her business associate appeared as an expert witness, given that they had worked together professionally in the past on projects, often referred work and clients to each other, and would continue to refer work and clients to each other); A.O. 2015-9 (opining that a member of the Westerly Town Council was prohibited by the Code of Ethics from participating in the town council’s discussions and decision-making relative to litigation involving Westerly Granite Company, LLC, given the petitioner’s insurance agent-client relationship with one of the owners of the company); A.O. 2005-64 (opining that a member of the Burrillville Redevelopment Agency could not participate in discussions or votes on matters coming before the agency regarding a nonprofit developer’s request for approval of a project, given that the petitioner was a partner in an accounting firm that provided accounting services to that developer on a continuing basis).

However, while the Code of Ethics clearly prohibits a public official from participating in matters directly affecting his or her *current* business associate, or in which his or her current business associate appears, the Ethics Commission has permitted a public official to participate in matters involving or impacting a *former* business associate, assuming no other conflicts were present. In determining whether a relationship between two parties constitutes an ongoing business association, the Ethics Commission examines, among other things, whether the parties are conducting ongoing business transactions, have outstanding accounts, or there exists an anticipated business relationship between the parties in the foreseeable future. For example, in Advisory Opinion 2019-60, the Ethics Commission opined that the building official for the Town of New Shoreham, who in his private capacity owned and operated a house watch service, was not required to recuse from matters that involved or financially impacted his former business associates, provided that any agreements for services between the petitioner and former clients had been severed prior to the petitioner performing any action in his public capacity in matters involving such former clients. The Ethics Commission further opined that all home watch services for former clients were required to have ceased prior to the petitioner performing any action in his public capacity in matters involving those former clients, with no outstanding fees due or refunds owed between the parties. Finally, there could be no understanding or expectation that the business association between the petitioner and any former client would resume once the petitioner had completed his work as building official for that individual. See also A.O. 2007-5 (opining that a Smithfield Town Council member's prior attorney-client relationship with an individual who sought legal advice related to his property that abutted the Slacks Reservoir dam did not prohibit that petitioner from participating in the town council's consideration of a matter related to the release of funds to repair the Slacks Reservoir dam, given that the attorney-client relationship, during which the client had not been charged, had ended more than a year prior with no plans for future representation); A.O. 2006-7 (opining that a member of the North Smithfield Zoning Board of Review was not prohibited from participating and voting on zoning board of review matters related to the proposed Dowling Village development project, notwithstanding that one of the petitioner's former business associates opposed the project).

In the present matter, the Petitioner represents that the business associate relationship between him and Mr. DeBlois ended in 2021. The Petitioner further represents that Mr. DeBlois was paid in full for the services he provided to the Petitioner. The Petitioner states that he does not anticipate any occasion for which he might require Mr. DeBlois' services in the future. Accordingly, it is the opinion of the Ethics Commission that the Petitioner is not prohibited from participating in discussions and decision-making relative to the matter currently pending before the planning commission and in which Mr. DeBlois is the applicant.

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(3)

§ 36-14-2(7)

§ 36-13-5(a)

§ 36-14-5(d)

§ 36-14-7(a)

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

Related Advisory Opinions:

A.O. 2019-60

A.O. 2016-45

A.O. 2015-9

A.O. 2007-5

A.O. 2006-7

A.O. 2005-64

Keywords:

Business Associate

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: November 18, 2025

Re: Jeffrey Wolfsberg

QUESTION PRESENTED:

The Petitioner, an administrator at the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities & Hospitals, a state employee position, requests an advisory opinion regarding whether the Code of Ethics prohibits him from accepting private, part-time employment as a recovery coach/peer support specialist with Tipping Point Recovery, an addiction recovery intervention company.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, an administrator at the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities & Hospitals, a state employee position, is not prohibited by the Code of Ethics from accepting private, part-time employment as a recovery coach/peer support specialist with Tipping Point Recovery, an addiction recovery intervention company.

The Petitioner is employed by the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities & Hospitals (BHDDH) in the position of administrator. He represents that in that capacity he serves as both program liaison to the Recovery Housing program and program director for the Recovery Friendly Workplace initiative. The Petitioner states that his work hours are from 8:30 a.m. to 4:00 p.m., Monday through Friday. The Petitioner explains that the BHDDH contracts with private individuals and non-profit entities to provide a safe living environment for individuals pursuing recovery from addiction. He adds that the BHDDH is currently under contract with 41 recovery houses. The Petitioner represents that, in his capacity as program liaison to the Recovery Housing program, among other things, he ensures that the above-referenced contracts are adhered to, that invoices are paid on time, and that people are receiving the help they need in pursuit of their recovery. The Petitioner explains that, as program director for the Recovery Friendly Workplace initiative, he works with private and public employers to assist them with developing and implementing practices and responses in support of employees who are in treatment or recovery, or in need of treatment due to mental health challenges or addiction.

The Petitioner states that he has an opportunity to engage in secondary, part-time employment with Tipping Point Recovery (Tipping Point) as a recovery coach/peer support specialist. He represents that Tipping Point is a private, nationwide recovery intervention company that provides guidance and support to families who have members battling addictions. The Petitioner explains that, following the completion of treatment, Tipping Point offers peer support provided by a recovery coach. The Petitioner represents that, as a recovery coach, he would be working four to six hours per week through remote virtual audio and video communication. He further represents that his work would be completed outside of his normal working hours with the BHDDH, during the evenings and weekends, and without the use of any public resources. The Petitioner informs that he does not expect to be working with Rhode Island residents.

The Petitioner states that in his public capacity, he does not have a caseload of individuals seeking or undergoing treatment for addiction or mental health problems or who are in recovery, and thus, he does not refer persons needing help with addiction or mental health problems to treatment providers. Nor does he oversee employees making those types of referrals. The Petitioner further states that Tipping Point is not one of the state-approved vendors with whom the BHDDH contracts to provide addiction recovery services to people in need of them. The Petitioner explains that if someone reaches out to him for assistance with an immediate crisis related to mental health or addiction, he will ordinarily advise the person to call 988, a suicide and crisis lifeline designed to provide immediate assistance to a person in crisis. The Petitioner informs that he has been advised by his superior to seek the instant advisory opinion. Therefore, given this set of facts, the Petitioner seeks guidance from the Ethics Commission regarding whether the Code of Ethics prohibits him from accepting part-time employment with Tipping Point.

The Code of Ethics provides 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 his duties 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 his duties in the public interest if he has reason to believe or expect that he, any person within his family, his business associate, or any business by which he is employed or which he represents, will derive a direct monetary gain or suffer a direct monetary loss by reason of his official activity. R.I. Gen. Laws § 36-14-7(a). Additionally, the Code of Ethics provides that a public employee shall not use his public office or confidential information received through his holding public office to obtain financial gain for himself, any person within his family, his business associate, or any business by which he is employed or which he represents. § 36-14-5(d). The Code of Ethics also provides that a public employee shall not accept other employment which will either impair his independence of judgment as to his official duties or employment or require or induce him to disclose confidential information acquired by him in the course of, and by reason of, his official duties or employment. § 36-14-5(b).

The Code of Ethics further prohibits a public employee from representing himself or any other person, or acting as an expert witness, before a state or municipal agency of which he is a member or by which he is employed. § 36-14-5(e)(1)-(3). These prohibitions extend for a period of one year after the public employee has officially severed his position with the subject state or municipal agency. § 36-14-5(e)(4). Finally, a public employee must recuse from participation in any matter in which his business associate or employer appears or presents evidence or arguments before his state agency. 520-RICR-00-00-1.2.1(A)(2) Additional Circumstances Warranting Recusal (36-14-5002).

The Ethics Commission has consistently opined that public officials and employees are not inherently prohibited from holding employment that is secondary to their primary public positions, provided that the private employment would neither impair their independence of judgment nor create an interest in substantial conflict with their public duties, and subject to certain other restrictions. See, e.g., A.O. 2016-4 (opining that a probation and parole officer with the Rhode Island Department of Corrections was not prohibited by the Code of Ethics from working at the Rhode Island Batterer's Intervention Program as a facilitator of a court-mandated batterer intervention program, given that his caseload did not include, and was unlikely to ever include, a probationer who required a referral to a batterers intervention program and that his private employment would occur on his own time, without the use of public resources, equipment, or confidential information obtained as part of his public employment); A.O. 2017-40 (opining that a probation and parole supervisor for the Rhode Island Department of Corrections was not prohibited by the Code of Ethics from working, in his private capacity, as an adjunct professor at Rhode Island College, provided that all work and preparation for his classes was performed on his own time and without the use of public resources or confidential information obtained as part of his state employment).

Here, given the Petitioner's representations, the analysis of the applicable provisions of the Code of Ethics, and consistent with prior advisory opinions issued, it is the opinion of the Ethics Commission that there is no evidence that the Petitioner's private, part-time employment as a recovery coach/peer support specialist with Tipping Point would either impair his independence of judgment or create an interest in substantial conflict with his public duties as a BHDDH employee. Accordingly, the Code of Ethics does not prohibit the Petitioner from working in his private capacity as a Tipping Point recovery coach/peer support specialist, provided that all of the work is performed on his own time and without the use of public resources or confidential information obtained as part of his state employment with the BHDDH and, further provided, that the Petitioner does not use his public employment to advertise or promote his private work or to recruit or obtain potential clients for Tipping Point. In the event that any changes occur with regard to the Petitioner's public and/or private employment that would present a potential conflict of interest under the Code of Ethics, the Petitioner is advised to seek further guidance from the Ethics Commission.

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(d)

§ 36-14-5(e)

§ 36-14-7(a)

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

Related Advisory Opinions:

A.O. 2017-40

A.O. 2016-4

Keywords:

Secondary Employment

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: November 18, 2025

Re: Raymond Taylor

QUESTION PRESENTED:

The Petitioner, the supervisor of the Onsite Wastewater Treatment Systems (OWTS) program within the Rhode Island Department of Environmental Management (RIDEM), a state employee position, requests an advisory opinion regarding whether he qualifies for a hardship exception to the Code of Ethics' prohibition against representing himself before the RIDEM's Freshwater Wetlands program in order to seek approval of site plan application relative to the construction of a detached, two-car garage structure and a small dock at his personal residence, and whether he may engage the services of a land surveyor who is licensed by the OWTS program as a septic designer and, if so, what restrictions, if any, the Code of Ethics imposes upon the Petitioner.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, the supervisor of the Onsite Wastewater Treatment Systems (OWTS) program within the Rhode Island Department of Environmental Management (RIDEM), a state employee position, qualifies for a hardship exception to the Code of Ethics' prohibition against representing himself before the RIDEM's Freshwater Wetlands program in order to seek approval of site plan application relative to the construction of a detached, two-car garage structure and a small dock at his personal residence, and may engage the services of a land surveyor who is licensed by the OWTS program as a septic designer, provided that the Petitioner adheres to the restrictions as outlined by the Ethics Commission herein.

The Petitioner is employed as an environmental engineer at the Rhode Island Department of Environmental Management (RIDEM). As such, he serves as the supervisor of the Onsite Wastewater Treatment System (OWTS) program within the RIDEM's Office of Water Resources. He represents that he has been employed by the RIDEM for the past 18 months.¹ The Petitioner would like to construct a detached, two-car garage with a storage space above it and a small dock at his personal residence, which he has owned for the past

¹ The Petitioner explains that he was previously employed by the RIDEM for 4.5 years, a service that was interrupted by his 18-month employment in the private sector.

three years. He represents that because his property is located on a river/pond, it falls within the jurisdiction of the Groundwater and Freshwater Wetlands (Wetlands) program, and he would likely need to receive a site plan approval from the Wetlands program. The Petitioner explains that the Wetlands program, like the OWTS program, is part of the RIDEM's Office of Water Resources. He states that the two programs are separate and independent from each other and that he has no supervisory duties over the Wetlands program.

The Petitioner represents that to prepare a site plan, he would have to engage the services of a land surveyor or an engineer, the majority of whom are licensed as septic designers by the OWTS program. He further represents that, as the OWTS program supervisor, he issues each septic design license. The Petitioner adds that septic design licenses must be renewed every three years. The Petitioner would like to hire for his project a land surveyor who holds a septic design license and whose work he is familiar with through the work the land surveyor has performed for the Petitioner's family members. The Petitioner explains that if this specific land surveyor is unavailable, it is likely that the next land surveyor available, who the Petitioner may decide to hire, would also hold a septic design license. The Petitioner explains that septic design license renewal applications are reviewed by his subordinates and signed by the Petitioner. He notes that if he is required to recuse from the issuance of a septic design license to the person he hires for the project, the Petitioner's superior could issue or renew such a license. Furthermore, the Petitioner states that land surveyors may occasionally represent clients before the Petitioner's program and that, although the Petitioner's subordinates ordinarily review such applications, he is the one who assigns the projects to a specific subordinate based on experience, project difficulty, and a subordinate's availability.

Given this set of facts, the Petitioner seeks guidance from the Ethics Commission regarding whether he qualifies for a hardship exception to the Code of Ethics' prohibition against representing himself before the RIDEM's Wetlands program in order to seek site plan approval of his project, and whether he may engage the services of a land surveyor who is also licensed by the OWTS program as a septic designer and, if so, what restrictions, if any, the Code of Ethics imposes upon the Petitioner.

Hardship Exception

The Code of Ethics prohibits a public employee from representing himself, or authorizing another person to represent him, before any state agency by which he is employed. R.I. Gen. Laws § 36-14-5(e)(1); 520-RICR-00-00-1.1.4(A)(1)(b) Representing Oneself or Others, Defined (36-14-5016). The "revolving door" language of § 36-14-5(e) is designed to prevent any undue influence that a current employee may have over his agency and colleagues by reason of his employment there. Under the Code of Ethics, a person represents himself before a state agency if he participates in, or authorizes another person on his behalf to participate in, the presentation of evidence or arguments before that agency

for the purpose of influencing the judgment of the agency in his own favor. R.I. Gen. Laws § 36-14-2(12); 520-RICR-00-00-1.1.4. These prohibitions apply to the entire agency, including all of its offices, sections, programs, or divisions, and are stricter than virtually any other provisions in the Code of Ethics. In most instances, public officials and employees may address potential conflicts of interest by declining to participate in related discussions and votes. Such is not the case with § 36-14-5(e). Absent an express finding by the Ethics Commission that a hardship exists, the prohibitions in § 36-14-5(e) are absolute, and continue while the public official or employee remains in office and for a period of one year thereafter. § 36-14-5(e)(1) & (4). Upon receiving a hardship exception, the public official or employee must also “follow any other recommendations that the Ethics Commission may make to avoid any appearance of impropriety in the matter.” § 36-14-5(e)(1)(iii).²

The Ethics Commission reviews questions of hardship on a case-by-case basis and has, in the past, considered the following factors in cases involving real property: whether the subject property involved the official’s principal residence or principal place of business; whether the official’s interest in the property was pre-existing to his public office or was recently acquired; whether the relief sought involved a new commercial venture or an existing business; and whether the matter involved a significant economic impact. When deciding whether to apply the hardship exception, the Ethics Commission considers the totality of the circumstances, and no single factor is determinative.

Notwithstanding that the OWTS and Wetlands programs operate separate and apart from each other, because they are within the same agency, the Petitioner’s proposed conduct falls squarely within the Code of Ethics’ prohibition against representing oneself before an agency by which he is employed. Therefore, the Ethics Commission will consider whether the unique circumstances represented by the Petitioner herein justify a finding of hardship to permit him to appear before the Wetlands program to seek site plan approval for his project.

Here, the Petitioner would like to construct a detached, two-car garage with a storage space above it and a small dock at his personal residence, which he purchased prior to his current employment with the RIDEM. The application is to be submitted to a program over which

² See, e.g., A.O. 2019-64 (granting a hardship exception to the president of the North Smithfield Town Council and permitting him to appear before the North Smithfield Zoning Board of Review to seek a dimensional variance for his personal residence, provided that he recused from the town council’s appointment or reappointment of any person to the zoning board until after the election cycle for his town council seat and following the complete resolution of his application before the zoning board, including appeals, and that, prior to the zoning board’s consideration of his variance application, he informed the zoning board members of his receipt of an advisory opinion and that, consistent therewith, he would recuse from their reappointments).

the Petitioner has no supervisory authority. The application to the RIDEM does not involve a new commercial venture but, rather, involves the improvement of the Petitioner's personal residence. Accordingly, based upon the specific facts as represented herein, it is the opinion of the Ethics Commission that the Petitioner qualifies for a hardship exception to the Code of Ethics' prohibition against representing himself before the state agency by which he is currently employed for purposes of seeking a site plan approval, provided that he does not use or attempt to use his official position to influence the decision of the Wetlands program.

Engagement of a Land Surveyor

The Code of Ethics prohibits a public employee from engaging in any business, employment, transaction, or professional activity that is in substantial conflict with the proper discharge of his duties or employment in the public interest. § 36-14-5(a). A substantial conflict of interest exists if a public employee has reason to believe or expect that he, any person within his family, his business associate, or any business by which he is employed or which he represents will derive a direct monetary gain or suffer a direct monetary loss by reason of his official activity. R.I. Gen. Laws § 36-14-7(a). Additionally, the Code of Ethics prohibits a public employee from using his public office or confidential information received through his public office to obtain financial gain for himself, any person within his family, his business associate, or any business by which he is employed or which he represents. § 36-14-5(d). A business associate is defined as "a person joined together with another person to achieve a common financial objective." § 36-14-2(3). Under the Code of Ethics, a public employee must also recuse from participation in any matter in which his business associate appears or presents evidence or arguments before his state agency. 520-RICR-00-00-1.2.1(A)(2) Additional Circumstances Warranting Recusal (36-14-5002).

The Ethics Commission has consistently required public officials and employees to recuse themselves from consideration of matters under circumstances where the public official or employee had an ongoing business associate relationship with an individual or entity that was appearing before his or her public body. See, e.g., A.O. 2016-45 (opining that a member of the Tiverton Planning Board was prohibited from participating in planning board discussions and voting relative to a matter in which her business associate appeared as an expert witness, given that they had worked together professionally in the past on projects, often referred work and clients to each other, and would continue to refer work and clients to each other); A.O. 2005-64 (opining that a member of the Burrillville Redevelopment Agency was prohibited from participating in discussions or votes on matters coming before the agency regarding a non-profit developer's request for approval of a project, given that the petitioner was a partner in an accounting firm that provided accounting services to that developer on a continuing basis).

In determining whether a relationship between two parties constitutes an ongoing business association, the Ethics Commission examines, among other things, whether the parties are conducting ongoing business transactions, have outstanding accounts, and/or whether there exists an anticipated future relationship between the parties. See, e.g., A.O. 2015-49 (opining that a zoning official who had performed private electrical work for the Fort Adams Trust in the past, and who planned to bid on future work, was a business associate of the Trust under the Code of Ethics); A.O. 2004-11 (opining that a Town of Lincoln School Building Commission member, who also owned a carpentry business, was a business associate of any person or entity with which he was engaged as a subcontractor and that the business associate relationship existed while the services were provided and until such time as the petitioner was paid and no further subcontracting work was anticipated).

Here, the Petitioner is not prohibited by the Code of Ethics from engaging a land surveyor who also holds a septic design license issued by the Petitioner. However, upon the engagement of the services of such a land surveyor, the Petitioner and the land surveyor will become business associates. Their business associate relationship will continue while they are conducting ongoing business transactions, have outstanding accounts or work to be performed, and/or while there exists an anticipated future relationship between them. Accordingly, during their ongoing business associate relationship, the Petitioner will be required to recuse from the septic design license renewal of the hired land surveyor. In those circumstances, the Petitioner's duties relative to the renewal of the septic design license of his business associate shall be delegated to a colleague in a position that is lateral or higher to that of the Petitioner. The Petitioner is further prohibited from reviewing a septic project in which his current or ongoing business associate appears to represent a client, files a site plan and/or application on behalf of a client, and/or appears as an expert witness. These prohibitions generally include, but are not limited to, the Petitioner's assignment to his subordinates of a project in which his business associate is involved. The Petitioner is advised to seek, if needed, further, more specific guidance relative to his public duties concerning a land surveyor he hires in the future.

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(3)

§ 36-14-2(12)

§ 36-14-5(a)

§ 36-14-5(d)

§ 36-14-5(e)

§ 36-14-7(a)

520-RICR-00-00-1.1.4 Representing Oneself or Others, Defined (36-14-5016)

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

Related Advisory Opinions:

A.O. 2019-64

A.O. 2016-45

A.O. 2015-49

A.O. 2005-64

A.O. 2004-11

Keywords:

Business Associate

Hardship Exception

RHODE ISLAND ETHICS COMMISSION

Draft Advisory Opinion

Hearing Date: November 18, 2025

Re: Peter W. Meusert

QUESTION PRESENTED:

The Petitioner, a member of the Scituate Town Council, a municipal elected position, who in his private capacity is a volunteer firefighter with the North Scituate Fire Department No.1, a private, non-profit organization, requests an advisory opinion regarding whether he is prohibited by the Code of Ethics from participating, as a town council member, in discussions between the town council and the fire department relative to complaints received by town council members regarding the operation of the fire department.

RESPONSE:

It is the opinion of the Rhode Island Ethics Commission that the Petitioner, a member of the Scituate Town Council, a municipal elected position, who in his private capacity is a volunteer firefighter with the North Scituate Fire Department No.1, a private, non-profit organization, is prohibited by the Code of Ethics from participating, as a town council member, in discussions between the town council and the fire department relative to complaints received by town council members regarding the operation of the fire department.

The Petitioner is a member of the Scituate Town Council, having been elected to that position in 2024. The Petitioner represents that he is also a volunteer firefighter with the North Scituate Fire Department No. 1 (NSFD), one of four fire departments in the town, that provides emergency medical and fire suppression services to Scituate residents and surrounding locales by way of mutual aid. The Petitioner states that the NSFD, like the other three fire departments, operates as a private, non-profit organization separate and apart from the town. The Petitioner further states that the volunteer firefighters within the NSFD are not town employees and that no municipal entity has management or control over the operations or decisions made by the NSFD. The Petitioner represents that separate, non-municipal entities, such as the Scituate Fire Engineering Board, manage or set policies for the NSFD's delivery of emergency medical and fire suppression services. The Petitioner notes that the fire engineering board is comprised of the fire chiefs of each of the fire departments. The Petitioner explains that as a volunteer firefighter, he is a member of

the NSFD's active crew,¹ and that he receives a stipend, in a manner as an independent contractor, based on the number of calls that he responds to during the year. The Petitioner states that the NSFD's budget consists of funds received from the town for operation and capital expenses, NSFD membership fees, donations, and various NSFD fundraising activities. He clarifies that the stipends are paid by the fire engineering board from the funds received from the town, but emphasizes that the town does not have any discretion or control over the stipends or how those funds are spent.

The Petitioner states that, over the past year, several town council members have received numerous complaints from various individuals regarding the operation of the NSFD. The Petitioner explains that, because the town provides funds to the NSFD, the town council is considering inviting the chief of the NSFD and, possibly, members of the NSFD command staff, to meet in executive session to discuss the complaints and the operation of the NSFD. The Petitioner notes that it is possible that, based on those discussions, the town council might consider an adjustment to the town's funding of the NSFD. Given this set of facts, the Petitioner seeks guidance from the Ethics Commission regarding whether he may participate in his public capacity in the town council meetings with the NSFD relative to the aforementioned complaints.

The Code of Ethics requires a public official to recuse from participation when his employer, his business associate, or any person within his family, either personally or through an authorized representative, appears or presents evidence or arguments before the public official's municipal agency. 520-RICR-00-00-1.2.1(A) Additional Circumstances Warranting Recusal (36-14-5002). Further, under the Code of Ethics, a public official 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 in the public interest. R.I. Gen. Laws § 36-14-5(a). A public official 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 a direct monetary loss will accrue, by virtue of the public official's activity, to the public official, any person within his family, his business associate, or any business by which he is employed or which he represents. R.I. Gen. Laws § 36-14-7(a). The Code of Ethics defines a business associate as "a person joined together with another person to achieve a common financial objective." R.I. Gen. Laws § 36-14-2(3). A person is defined as "an individual or a business entity." § 36-14-2(7). Lastly, a public official is prohibited from using his public office or confidential information received through his public office to obtain financial gain for himself, any person within his family, his business associate, or any business by which he is employed or which he represents. § 36-14-5(d).

Here, the Petitioner is paid a stipend for his services as a volunteer firefighter in the manner of an independent contractor for the NSFD, which, he represents, is a private entity. This

¹ The NSFD's by-laws describe the active crew as consisting of one firefighting company and one rescue company.

makes the Petitioner a business associate of the NSFD. Accordingly, based on the facts as presented by the Petitioner and the provisions of the Code of Ethics cited above, it is the opinion of the Ethics Commission that the Petitioner is prohibited from participating as a town council member in any discussions between the town council and the NSFD relative to the complaints received by town council members regarding the NSFD's operation. Compare A.O. 2015-32 (opining that a member of the Jamestown Planning Commission was not prohibited from participating in the planning commission's consideration of the Jamestown Fire Department's fire station development plan review application, notwithstanding that he was a volunteer firefighter receiving a stipend from that fire department, given that the fire department was considered a municipal agency, rather than a private entity, and there was no corresponding financial impact upon him as a volunteer firefighter with the fire department). Recusal must be filed consistent with the provisions of R.I. Gen. Laws § 36-14-6. The Petitioner is also prohibited from using his public office or confidential information received through his public office to obtain financial gain for himself or the NSFD. Finally, the Petitioner is reminded that he is generally prohibited from participating in any town council discussions and decision-making, either in open or executive session, on matters that would have a direct financial impact upon the NSFD and/or the Petitioner.

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(3)

§ 36-14-2(7)

§ 36-14-5(a)

§ 36-14-5(d)

§ 36-14-6

§ 36-14-7(a)

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

Related Advisory Opinions:

A.O. 2015-32

Keywords:
Business Associate
Recusal

DRAFT