

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

In re: Donna Travis,  
Respondent

Complaint Nos. 2017-1 &  
2017-2

**ORDER**

This matter having been heard before the Rhode Island Ethics Commission on June 6, 2017, pursuant to Commission Regulation 1011, and the Commission having considered the Complaints herein, the Respondents' Answers, the arguments of the parties, and the proposed Informal Resolution and Settlement, which is incorporated by reference herein, it is hereby

**ORDERED, ADJUDGED AND DECREED**

THAT, the Commission approves the Informal Resolution and Settlement as submitted; and

THAT, the Commission incorporates by reference herein the Findings of Fact and Admissions, and the Conclusions of Law, set forth in the Informal Resolution and Settlement; and

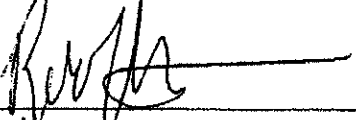
THAT, the Respondent failed to make required disclosures, as required by Commission Regulation 36-14-17008, Leadership Positions with Not-for-Profit Organizations, on her 2010-2015 Statements filed with the Commission pursuant to R.I. Gen. Laws § 36-14-16; and

THAT, the Respondent violated R.I. Gen. Laws § 36-14-5(a) by sponsoring and voting on a resolution on May 9, 2011, to extend the City of Warwick's lease to Join Our Neighborhood and Help (JONAH), Inc., of which she is an officer; and

THAT, the Respondent violated R.I. Gen. Laws § 36-14-5(a) by participating in Warwick City Council discussions related to the award of Contributive Support Grants to Join Our Neighborhood and Help (JONAH), Inc., as a line item in the City Department of Human Services budget at the May 29, 2014 City Council Budget Hearing; and

THAT, the Respondent is ordered to pay a civil penalty in the amount of One Thousand Two Hundred Dollars (\$1,200).

Entered as an Order of this Commission,

  
\_\_\_\_\_  
Chairperson

Dated: June 6, 2017

**STATE OF RHODE ISLAND  
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In re: Donna Travis,  
Respondent

Complaint Nos. 2017-1 &  
2017-2

**INFORMAL RESOLUTION AND SETTLEMENT**

The Respondent, Donna Travis, and the Rhode Island Ethics Commission ("Commission") hereby agree to a resolution of the above-referenced matters as follows:

**I. FINDINGS OF FACT & ADMISSIONS**

**A. Financial Disclosure Statements**

1. The Respondent was elected to the Warwick City Council ("City Council") in January 2003 and has served continuously in said capacity.

2. As a municipal elected official during calendar years 2010 through 2015, the Respondent was required to file annual Financial Disclosure Statements ("Statements") with the Commission on or before the last Friday of each year.

3. The Respondent served as Vice President of Join Our Neighborhood and Help (JONAH), Inc., a Rhode Island non-profit organization, in 2010. The Respondent served as President of JONAH from 2011-2015.

4. The Respondent served as Vice President of the Oakland Beach Carousel Foundation, a Rhode Island non-profit organization, from 2010-2015.

5. The Respondent served as Director of the Oakland Beach Real Estate Owners Association, a Rhode Island non-profit organization, in 2010, and Vice President of the same from 2012-2015.

6. The Respondent's spouse, William Travis, held the position of a Director of the Oakland Beach Real Estate Owners Association from 2011-2015.

7. On her 2010-2015 Statements, which were timely filed with the Commission pursuant to Rhode Island General Laws § 36-14-16, the Respondent failed to disclose that she and her spouse held the above-listed executive positions, as required by Commission Regulation 36-14-17008.

**B. Sponsoring and Voting on the Resolution to Extend the City of Warwick's Lease to JONAH.**

1. The property at which JONAH is located at 830 Oakland Beach Avenue in Warwick, Rhode Island, is owned by the Oakland Beach Congregational Church and St. Rita's Church Corporation.

2. On November 10, 1980, the two churches entered into a lease agreement with the City of Warwick ("City") for the property at 830 Oakland Beach Avenue by which the City would pay \$1.00 per year for a period of 50 years. On the same date, the City entered into a sublease agreement with JONAH for the same property by which JONAH would pay \$1.00 per year for a ten-year period.

3. Every ten years since the City and JONAH entered into the 1980 lease agreement, the lease has been extended for an additional ten years by City Council resolution and vote, and the lease has been signed by the Mayor and a representative of JONAH.

4. On May 9, 2011, the Respondent, in her official capacity as Council member, sponsored and voted on a resolution to extend JONAH's lease for the same terms. The renewed lease to JONAH went into effect on January 11, 2012, and was signed by Mayor Avedisian and the Respondent as the President of JONAH.

**C. The Use of City Resources for the Maintenance of JONAH's Property.**

1. The area adjacent to JONAH's premises is the George E. Schmeider Memorial Park, in which a basketball court and scoreboard are located. While the park abuts JONAH's

premises, the park is City-owned property.

2. The Mayor of the City and the Director of the City's Department of Public Works send municipal maintenance crews to clean the park and maintain the grounds, and they also arranged for the installation of the scoreboard for the basketball court.

3. The City Council did not and does not make any decisions to maintain and clean the park area nor did it have any involvement in the installation of the scoreboard.

4. JONAH is responsible for its own maintenance and upkeep, and it expends monies for various maintenance work on its leased property. At times, volunteers will perform some services for JONAH, like snow removal.

5. The Respondent did not facilitate the use of City resources for the performance of maintenance and installation work at the premises leased to JONAH at 830 Oakland Beach Avenue.

**D. The Respondent's Participation in City Council Discussions Regarding City Grants Awards to JONAH.**

1. The City's Department of Human Services allocates municipal funds, Contributive Support Grants ("Support Grants"), to various non-profit agencies in the City that offer assistance to underprivileged families in the City.

2. A three-member Contributive Support Review Committee ("Review Committee") determines an agency's eligibility and the amount of funding to be awarded to it. The Review Committee presents its recommendations to the Mayor, and the Mayor either accepts or rejects the Committee's recommendations.

3. Upon accepting the Committee's recommendations, the Mayor includes the appropriated funds in the proposed budget that he submits to the City Council for its review and approval. The total funds appear as a Human Services line item in the overall City budget on

which the City Council votes.

4. Each year from 2011 through 2016, each non-profit agency receiving Support Grants, including JONAH, appeared as an individual line item within the total Human Services budget.

5. In each fiscal year, although the City Council voted on the entire City budget as a whole, its members frequently engaged in substantive discussions regarding various line items within the Human Services budget.

6. During the City Council's 2014-2015 Budget Hearing on May 29, 2014, the Respondent participated in substantive discussions regarding the award of Support Grants to JONAH.

## II. CONCLUSIONS OF LAW

### A. Financial Disclosure

1. As a municipal elected official, the Respondent was, at all relevant times, subject to the financial disclosure mandate of R.I. Gen. Laws § 36-14-16.

2. On her 2010-2015 Statements filed with the Commission pursuant to R.I. Gen. Laws § 36-14-16, the Respondent failed to disclose executive positions that she and her spouse held in JONAH, the Oakland Beach Carousel Foundation, and the Oakland Beach Real Estate Owners Association, as required by Commission Regulation 36-14-17008, Leadership Positions with Not-for-Profit Organizations.

### B. Sponsoring and Voting on the Resolution to Extend the City of Warwick's Lease to JONAH.

1. As a municipal elected official, the Respondent was, at all relevant times, subject to the Rhode Island Code of Ethics in Government, pursuant to R.I. Gen. Laws § 36-14-4(1).

2. As a member of the Board of Directors of JONAH, a non-profit organization, the

Respondent was a business associate of JONAH pursuant to R.I. Gen. Laws § 36-14-2(3).

3. In her official capacity as a member of the City Council, the Respondent sponsored a resolution to extend JONAH's lease for the premises at 830 Oakland Beach Avenue and voted on same at the City Council's May 9, 2011 meeting.

4. By sponsoring a resolution to extend JONAH's lease and voting thereon while serving as an officer of JONAH, the Respondent had a substantial conflict of interest in violation of R.I. Gen. Laws § 36-14-5(a).

**C. The Use of City Resources for the Maintenance of JONAH's Property.**

1. As a municipal elected official, the Respondent was, at all relevant times, subject to the Rhode Island Code of Ethics in Government, pursuant to R.I. Gen. Laws § 36-14-4(1).

2. Based on the totality of the circumstances as set forth herein, the Ethics Commission concludes that the Respondent did not facilitate the use of City resources for the performance of maintenance and installation work at the premises leased to JONAH at 830 Oakland Beach Avenue and, therefore, did not violate the Code of Ethics.

3. Accordingly, this claim against the Respondent is dismissed with prejudice.

**D. The Respondent's Participation in City Council Discussions Regarding City Grant Awards to JONAH.**

1. As a municipal elected official, the Respondent was, at all relevant times, subject to the Rhode Island Code of Ethics in Government, pursuant to R.I. Gen. Laws § 36-14-4(1).

2. By participating in the City Council's discussions related to the award of Contributive Support Grants to JONAH as a line item in the City Department of Human Services budget, the Respondent had a substantial conflict of interest in violation of R.I. Gen. Laws § 36-14-5(a).

### III. SETTLEMENT

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

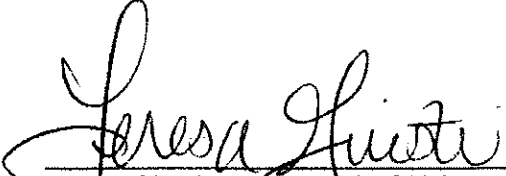
1. The Commission shall enter an Order and Judgment that the Respondent failed to make the required disclosures, as required by Commission Regulation 36-14-17008, Leadership Positions with Not-for-Profit Organizations, on her 2010-2015 Statements filed with the Commission pursuant to R.I. Gen. Laws § 36-14-16.


2. Said Order and Judgment shall further provide that the Respondent violated R.I. Gen. Laws § 36-14-5(a) by sponsoring and voting on a resolution on May 9, 2011, to extend the City of Warwick's lease to Join Our Neighborhood and Help (JONAH), Inc., of which she is an officer.

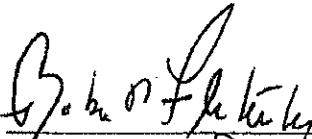
3. Said Order and Judgment shall finally provide that the Respondent violated R.I. Gen. Laws § 36-14-5(a) by participating in Warwick City Council discussions related to the award of Contributive Support Grants to Join Our Neighborhood and Help (JONAH), Inc., as a line item in the City Department of Human Services budget at the May 29, 2014 City Council Budget Hearing.

4. The Respondent agrees that, pursuant to the above Findings of Fact and Conclusions of Law, the Prosecution will recommend the imposition of a civil penalty in the amount of One Thousand Two Hundred Dollars (\$1,200.00). The Respondent agrees to the payment of said civil penalty.

5. The above terms represent the full and complete Informal Resolution and Settlement for Complaint Nos. 2017-1 & 2017-2.

  
Teresa Giusti, Esq. (Bar No. 8006)  
Commission Prosecutor  
Dated: June 6, 2017

  
Donna M. Travis  
Respondent  
Dated: June 5, 2017

  
Robert E. Flaherty, Esq. (Bar No. ) 2313  
Respondent's Counsel  
Dated: June 5, 2017