★ **Common Cause**
Rhode Island
Holding Power Accountable

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ETHICS COMMISSION

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April 24, 2025

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

Dear Members of the Rhode Island Ethics Commission:

This letter follows up on the Commission's discussion at your March 25th meeting about the draft proposed rule for amendments to the gift rule submitted by Common Cause Rhode Island.

During the Commission's discussion of the language proposed by Common Cause Rhode Island, Commissioner Ricci asked whether the proposed amendments would cover government lobbyists. When drafting our original proposal we did not include, or contemplate, the role of governments and their lobbyists.

According to the most recent records of the Rhode Island Secretary of State, currently the Rhode Island Judiciary employs three lobbyists from two different lobbying firms. The Association of Trial Judges, or any other courts, do not have any registered lobbyists. Including the Rhode Island Judiciary we also counted at least 28 government agencies that employ lobbyists.[1]

Common Cause Rhode Island believes that no lobbyists, whether representing private interests like for-profit and not-for-profit organizations, or governments, should be providing gifts in excess of the current limits to public officials they are lobbying. As we stated in our February 4, 2025 letter, we believe that it is a conflict of interest for a lobbyist to provide a gift to someone they are lobbying unless it falls into one of the enumerated exceptions 520-RICR-00-00-1.4.2.

We believe that the language we proposed in our February letter would include governments as an "other entity" but we are happy to suggest additional language to clarify.

Sincerely,

John Marion
Executive Director

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[1] That total excludes unions who represent government employees, associations of government (e.g. Rhode Island League of Cities and Towns, etc.), and charter schools.