

Hearing and public comment on proposed
regulatory amendments to the Code of Ethics' gift
rule at 520-RICR-00-00-1.4.2

**RHODE ISLAND GOVERNMENT REGISTER
PUBLIC NOTICE OF PROPOSED RULEMAKING**

ETHICS COMMISSION

Title of Rule: Code of Ethics (520-RICR-00-00-1)

Rule Identifier: 520-RICR-00-00-1

Rulemaking Action: Proposed Amendment

Important Dates:

Date of Public Notice: June 26, 2025

Hearing Date: September 9, 2025

End of Public Comment: September 16, 2025

Rulemaking Authority:

R.I. Constitution

art. III

sec. 8

R.I. Gen. Laws § R.I. Gen. Laws § 36-14-9(a)(3)

Summary of Rulemaking Action:

There are two proposed amendments to the Code of Ethics' gift rule at 520-RICR-00-00-1.4.2. Each proposed amendment is independent of the other.

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.

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.

Additional Information and Public Comments:

All interested parties are invited to request additional information or submit written or oral comments concerning the proposed amendment until September 16, 2025 by contacting the appropriate party at the address listed below:

Jason Gramitt, Director
Ethics Commission
Rhode Island Ethics Commission
40 Fountain Street
Providence, RI 02903

Public Hearing:

A public hearing, in accordance with R.I. Gen. Laws § 42-35-2.5, to consider the proposed amendment shall be held at which time and place all persons interested therein will be heard. This hearing is subject to R.I. Gen. Laws Chapter 42-46, Open Meetings.

Public Hearing Information:

Date: September 9, 2025

Time: 9:00 A.M.

Location: Rhode Island Ethics Commission
40 Fountain St.
Providence, RI, 02903

The place of the public hearing is accessible to individuals with disabilities. If communication assistance (readers/interpreters/captioners) is needed, or any other accommodation to ensure equal participation, please call 401-222-3790 or RI Relay 711 at least three (3) business days prior to the meeting so arrangements can be made to provide such assistance at no cost to the person requesting. For questions regarding available parking, please contact the agency staffperson listed above.

Regulatory Analysis Summary and Supporting Documentation:

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.

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.
- C. "Interested person," for purposes of this section, means:
1. a person, business, or other entity, whether for profit or not for profit, or a representative of such a person, or business, or other entity, that has a direct financial interest in a decision that the person subject to the Code of Ethics is authorized to make, or to participate in the making of, as part of his or her official duties; or
 2. a person, business, or other entity, whether for profit or not for profit, that engages lobbyists or is a registered lobbyist or lobbying firm as defined by the laws, regulations, or municipal ordinances of this state.
- D. The prohibitions in this section do not apply if the gift or thing of economic value is given:
1. because of the recipient's membership in a group, a majority of whose members are not persons subject to the Code of Ethics, and an equivalent gift is given or offered to other members of the group; ~~or~~

2. by an interested person who is a person within the family of the recipient, unless the gift is given on behalf of someone who is not a member of said family;
3. by an interested person as defined in subsection (C)(2), that is not also an interested person as defined in subsection (C)(1), to a public official or employee who is not a member or employee of the state or municipal agency that the interested person is lobbying; or
4. in the form of food or beverage for immediate consumption at a reception or fundraiser to which all members of the General Assembly or statewide officers are invited and is hosted not more than once in any year by a not for profit entity that is not an interested person as defined in subsection (C)(1).

E. For purposes of this regulation, a gift or other thing of value is considered received when it comes into the possession or control of the person subject to the Code of Ethics, or his or her spouse or dependent child, and is a gift or other thing of value subject to the requirements of this regulation unless it is immediately returned to the interested person or given to a bona fide charitable organization without benefit accruing to the person subject to the Code of Ethics.

MEMORANDUM

To: Rhode Island Ethics Commission

From: Jason Gramitt, Executive Director

Date: May 14, 2025

Re: Gift Limits – Nationwide Comparison

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 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.¹

¹ 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,² the Council on Government Ethics Laws,³ and the National Conference of State Legislatures,⁴ 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.

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.

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

³ https://cdn.ymaws.com/www.cogel.org/resource/resmgr/cogel_blue_books/cogel_blue_book_2024_ethics.pdf (last accessed May 8, 2025).

⁴ <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)

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

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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> 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 | <https://ethics.ri.gov>

40 Fountain Street, 8th Floor | Providence, RI 02903

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Depina, Sabrina (ETHICS)

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

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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

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Depina, Sabrina (ETHICS)

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

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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)

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)

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)

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)

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)

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)

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)

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)

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)

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)

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)

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
401-641-6033
1295 South Road, East Greenwich, RI 02818
www.susanaitcheson.com [susanaitcheson.com]
Providence Art Club Artist Member

Depina, Sabrina (ETHICS)

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)

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)

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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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 \[go.zackmezero.com\]](#)

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)

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

--

Depina, Sabrina (ETHICS)

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)

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)

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)

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 1998.¹ 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.² 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.³ 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

¹ H. Philip West Jr., Secrets and Scandals, at 404 (2014).

² Id., at 403-404.

³ 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.⁴ 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.⁵ 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

⁴ *Id.*, at 576-577.

⁵ 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)

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)

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

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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)

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 Alvisi! 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)

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)

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.¹

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.

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

CVS HEALTH	ROBERT GOLDBERG	1/1/25	12/31/25	\$8,333.33	49,999.98
Brown University Health	ROBERT GOLDBERG	1/6/25	12/31/25	\$6,000.00	36,000.00
	ROBERT GOLDBERG	7/21/25	12/31/25	\$5,000.00	5,000.00
45 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$11,325.00	\$ 391,999.98
ROBERT JACQUARD					
VISA U.S.A. INC.	CAPITOL STRATEGIES GR	1/2/25	3/18/25	\$60,000.00	60,000.00
SELF STORAGE ASSOCIATION	CAPITOL STRATEGIES GR	1/2/25	6/30/25	\$3,500.00	21,000.00
RHODE ISLAND LIBRARY ASSOC	CAPITOL STRATEGIES GR	1/4/25	12/31/25	\$10,000.00	10,000.00
AUTO BODY ASSOCIATION OF RI	CAPITOL STRATEGIES GR	1/8/25	12/31/25	\$25,000.00	25,000.00
Fujifilm Holdings America Corporatio	CAPITOL STRATEGIES GR	1/8/25	12/31/25	\$5,000.00	30,000.00
J ARTHUR TRUDEAU CENTER	CAPITOL STRATEGIES GR	1/8/25	3/18/25	\$2,000.00	12,000.00
MEALS ON WHEELS OF RI, INC.	CAPITOL STRATEGIES GR	1/8/25	12/31/25	\$20,000.00	20,000.00
RI PAWNBROKERS ASSOCIATION	CAPITOL STRATEGIES GR	1/8/25	3/18/25	\$1,666.67	10,000.02
SIMS METALS MANAGEMENT	CAPITOL STRATEGIES GR	1/8/25	3/18/25	\$1,000.00	6,000.00
TURO	CAPITOL STRATEGIES GR	1/8/25	3/18/25	\$5,000.00	30,000.00
CARE NEW ENGLAND	CAPITOL STRATEGIES GR	1/8/25	12/31/25	\$10,000.00	60,000.00
The American Kratom Association	CAPITOL STRATEGIES GR	1/9/25	7/31/25	\$4,500.00	27,000.00
AFSCME RI Retirees Chapter 94	CAPITOL STRATEGIES GR	1/13/25	6/30/25	\$25,000.00	25,000.00
Veteran Benefits Guide	CAPITOL STRATEGIES GR	2/1/25	6/30/25	\$6,000.00	36,000.00
RHODE ISLAND DENTAL ASSOCIAC	CAPITOL STRATEGIES GR	1/1/25	12/31/25	\$2,250.00	13,500.00
REVITY ENERGY LLC	CAPITOL STRATEGIES GR	1/1/25	3/18/25	\$3,500.00	21,000.00
AXCESS FINANCIAL	CAPITOL STRATEGIES GR	3/4/25	3/18/25	\$5,000.00	30,000.00
RHODE ISLAND PUBLIC HEALTH I	CAPITOL STRATEGIES GR	1/1/25	12/31/25	\$2,000.00	12,000.00
5 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$ 950.00	\$ 448,500.02
DONALD LALLY					
HAXTON'S TOLLGATE LIQUORS	NARRAGANSETT CONSUL	2/13/25	12/31/25	\$12,000.00	72,000.00
HAXTON'S TOLLGATE LIQUORS	DONALD J LALLY	1/1/25	12/31/25	\$12,000.00	72,000.00
3 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$ 800.00	\$ 144,000.00
NICHOLAS MATTIELLO					
Brown University Health	WESTMINSTER CONSULTI	1/27/25	12/31/25	\$2,000.00	12,000.00
Amos House	WESTMINSTER CONSULTI	3/13/25	12/31/25	/A Pro-Bono	
2 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$ 700.00	\$ 12,000.00
WILLIAM J. MURPHY					
Deere & Company	DOME CONSULTANTS, LL	1/3/25	6/30/25	\$12,500	12,500.00
AMICA INSURANCE	DOME CONSULTANTS, LLC	1/8/25	12/31/25	\$4,000.00	24,000.00
WALMART INC.	DOME CONSULTANTS, LL	1/3/25	12/31/25	\$25,000	25,000.00
CNH INDUSTRIAL AMERICA LLC	DOME CONSULTANTS, LL	1/3/25	6/30/25	\$12,500	12,500.00
DELOITTE CONSULTING LLP	DOME CONSULTANTS, LLC	1/6/25	12/31/25	\$4,000	24,000.00
RI HEALTH AND EDUCATIONAL B	DOME CONSULTANTS, LLC	1/7/25	12/31/25	\$4,000	24,000.00
PURPOSE FINANCIAL, INC. (DBA	DOME CONSULTANTS, LL	1/7/25	12/31/25	\$30,000	30,000.00
RHODE ISLAND HEALTH CENTER	DOME CONSULTANTS, LLC	1/7/25	12/31/25	\$3,000	18,000.00
RHODE ISLAND MFG ASSOCIATIO	DOME CONSULTANTS, LLC	1/8/25	12/31/25	\$3,000	18,000.00
RHODE ISLAND ENERGY	DOME CONSULTANTS, LLC	1/8/25	12/31/25	\$5,000	30,000.00
CARE NEW ENGLAND	DOME CONSULTANTS, LLC	1/13/25	12/31/25	\$5,000	30,000.00
Cookware Sustainability Alliance c.o	DOME CONSULTANTS, LLC	1/14/25	4/30/25	\$5,000	30,000.00
BALLY'S CORPORATION	DOME CONSULTANTS, LLC	1/21/25	12/31/25	\$5,000	30,000.00
PHARMACEUTICAL RESEARCH A	DOME CONSULTANTS, LLC	1/21/25	12/31/25	\$5,000	30,000.00
Rhode Island Smoke Free Trade Or	DOME CONSULTANTS, LLC	1/21/25	12/31/25	\$3,000	18,000.00
RHODE ISLAND JUDICIARY	DOME CONSULTANTS, LL	1/24/25	12/31/25	\$20,000	20,000.00
ANHEUSER-BUSCH COMPANIES	DOME CONSULTANTS, LLC	1/24/25	12/31/25	\$3,333.33	19,999.98
THE PRESERVATION SOCIETY OF	DOME CONSULTANTS, LLC	1/24/25	12/31/25	\$3,333.33	19,999.98
RHODE ISLAND DENTAL ASSOCIAD	DOME CONSULTANTS, LLC	1/1/25	12/31/25	\$2,250	13,500.00
Rhode Island Philharmonic Orchestr	DOME CONSULTANTS, LLC	1/1/25	12/31/25	\$2,500	15,000.00
IQVIA obo MultiState Associates L	DOME CONSULTANTS, LL	2/26/25	12/31/25	\$20,250	20,250.00
Rhode Island Association of Aesth	DOME CONSULTANTS, LL	3/28/25	12/31/25	\$10,000	10,000.00
33 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$14,450.00	\$ 474,749.96
TERESA WEED					
DOORDASH, INC.	F/S CAPITOL CONSULTING	1/1/25	12/31/25	\$5,000.00	30,000.00
AMERICAN PROPERTY CA	SUALT F/S CAPITOL CONSULTING	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>OPPFI</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 & 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>
42 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$11,950.00	\$ 646,787.50

JOHN J. TASSONI					
<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>
21 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$ 2,650.00	\$ 9,000.00

GEORGE ZAINYEH					
<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>
49 CAMPAIGN CONTRIBUTIONS REPORTED January 1-June 30, 2025:				\$12,975.00	\$ 645,999.96

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)

From: Patrick Laverty <patricklaverty@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 Laverty, 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 Laverty
78 Boulevard Ave
Lincoln, RI

Depina, Sabrina (ETHICS)

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

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.

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.

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.

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)

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)

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)

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
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)

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

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)

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)

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)

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)

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)

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)

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)

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

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