## In the Matter Of:

## PUBLIC HEARING-GIFT RULE

## **HEARING**

September 09, 2025



1	STATE OF RHODE ISLAND
2	RHODE ISLAND ETHICS COMMISSION
3	
4	MEETING
5	
6	September 9, 2025
7	9:29 a.m.
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9	Hearing Room, 8th Floor
10	40 Fountain Street
11	Providence, Rhode Island 02903
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15	Agenda Item 8: Hearing and public comment on proposed
16	regulatory amendments to the Code of Ethics' gift rule
17	at 520-RICR-00-00-1.4.2, pursuant to R.I. Gen. Laws
18	36-14-9 and 42-35-2-8
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24	Alec Ricker
25	Digital Reporter Notary Commission Expires: October 18, 2030



1	APPEARANCES
2	LAUREN E. JONES, CHAIR
3	HOLLY J. SUSI, VICE CHAIR
4	MATTHEW D. STRAUSS, SECRETARY
5	DR. MICHAEL BROWNER, JR.
6	CHRISTOPHER P. CALLAHAN
7	FRANK J. CENERINI
8	EMMA L. PETERSON
9	SCOTT P. RABIDEAU
10	HUGO L. RICCI, JR.
11	
12	Also Present:
13	Jason Gramitt, Esq., Executive Director/Chief Prosecutor
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1 (The proceedings commenced at 9:29 a.m.)

CHAIR JONES: An agenda item, but we're here for a hearing and public comment on proposed regulatory amendments to the Gift Rule Act for a portion of the act.

And I just want to say a couple of things before we get going here. We have already received written public comment. We will not be detailing those or summarizing them today. They're available to anyone who wishes to look at them. If there are handouts this morning, we'll take your handouts as well.

I want to be clear before we start here, because the press has had this wrong, we have not proposed to change any rule. We have proposed to consider whether to change rules.

The fact that this is set up for a public hearing today does not mean at all that this commission has made any decision on any of the proposed amendments to rules and regulations.

I think that's important to say because there is not, as we sit here right now, a predilection to either side. That has not been discussed by our commission at all.

As far as time goes, I'll get the sign-up sheet and know how many people are up here, I don't



really want to put a limit on the amount of time people
can speak, but I will ask you to be aware that we have
nine folks up here who are busy people beyond what we do
here. It's a volunteer job.

Secondly, there are at least 10 or 15 people here, which means five minutes each would get you into a substantial period of time. But there are probably a few people who don't want to speak more than a minute or two.

So rather than put limits on it, I'd ask you to be respectful of the time. Try to use the time appropriately, try not to be totally repetitive, although I know you have to say what you have to say, and then let us go from there as we address what we have to address in subsequent meetings.

It's already been noted we're recording this session because we think we should or we're required to.

There's, I don't believe, anything else, at this point, we need to do for the record, so I guess I'll ask for the sign-up sheet, but I know -- I think I know that Mr. Marion is to speak first. I would ask Mr. Marion to come forward.

MR. GRAMITT: As you speak, you can either take the podium or take the seat if you're more comfortable seated.



	CHAIR JONES:	I have six ]	people on t	the sign-up
sheet.	Are there other	s who have n	ot signed (	up who are
here to	speak? All righ	ht.		

JOHN MARION: Great, thank you, and I'll try to keep it within the recommended limit.

I'm John Marion from Common Cause Rhode
Island, again. I want to thank you for taking our
testimony. We submitted written testimony that you have
in your packet.

I want to start by saying that we're supporting one change and opposing one other proposed change. I'm going to start with the change that we're supporting.

Back in December, you received a letter from us in the form of a petition to begin a rule-making process because we believe we have discovered a loophole in the Gift Rule of the Code of Ethics. That loophole allows public officials and employees to take unlimited gifts from lobbyists, lobbying firms, and those employing lobbyists as well, as long as they don't meet the definition of an interested person in the Code of Ethics.

We, as an organization, believe that lobbyists, lobbying firms, and those who employ lobbyists are, by definition, interested persons and the



gifts they provide to public officials and employees
should be subject to the strict limits of the Gift Rule.

We believe that, in using public office or employment for private gain, if someone takes a gift from someone who is, by definition, being paid or is paying someone to influence them, that's a conflict of interest.

Why would someone hire a lobbyist if they didn't have an interest in the outcome of a government decision? Why would someone subject to the Code of Ethics be receiving a gift from a lobbyist if not because of their public position?

So as you know, we propose changing the definition of an interested person to categorically include lobbyists, lobbying firms, and people employed lobbyists, as 22 states already do.

After I appeared before you in February, we put forth specific language to effectuate this change and that's the language you have before you. That language reflects not only Common Cause Rhode Island's desire to regulate these gifts, but the Commission's desire to create a targeted change to the code. That's why the proposed language does not simply close the loophole and categorically include lobbyists, lobbying firms, and those who employ lobbyists, the definition of



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an interest in person, but it only includes them if they're currently lobbying or paying someone to lobby the person who is subject to the Code of Ethics. was an exception that you requested and we tried to incorporate your feedback into the proposed change.

We also allowed for an exception for food and drink consumed at an event that all members of the general assembly or all statewide officeholders are invited to. This preserves a common practice that public events have become traditions for the nonprofit community in the state.

We believe these changes strengthen the Gift Rule significantly by tightening restrictions while also appropriately targeting the new restrictions to focus on when the relationships or gifts represent a conflict.

We note, in the packet that you received, it appears no one has submitted testimony in opposition to these changes, so far, although the period is open for another week. That includes from the 600 registered lobbyists in the state who received a notice by the commission staff.

We also note that several pieces of testimony came in from registered lobbyists in favor of the change, and they're all registered lobbyists for nonprofit organizations.



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Additionally, we reached out to the Secretary of State, asked them to weigh in. They chose not to. I actually think that speaks to the fact that they likely don't oppose this change, if they chose not to weigh in, and they are the entity that is charged with regulating lobbyists.

The next thing I want to speak to briefly is the other proposed change here, which is the increase in the maximum value of a regulated gift from \$25 to \$50 and the annual aggregate value of a regulated gift from an interested person from \$75 to \$150. Common Cause Rhode Island opposes this change.

We believe that the \$25 limit is the appropriate limit for permissible gifts. This limit was set two decades ago to allow for interested persons to give government officials and employees de minimis gifts without violating the Code of Ethics. That is reflected in the colloquial name that I have always used for it, which is the Cup of Coffee Rule. We feel that \$25 is still sufficient amount to allow for incidental purchases that will not unduly influence public officials and employees while also protecting the public's interest in a clean government.

We want to note that the origins of this proposed increase in the amount of allowable gifts are



not people who are here to testify in front of you today, but actually people subject to the Code of Ethics, the people who want to receive larger gifts, particularly a small group of legislators who want to take gifts in excess of the current limits.

It's no surprise to us that the regulated entity wants to see this relief from the regulation.

They -- one legislator went so far as to propose an increase, a statutory increase to \$250 annually in the aggregate amount.

It's also notable that, so far, you have received no written testimony from any of the parties that asked you to do this informally, despite the legislature receiving the notice.

We think those legislators should remember the old saying that there's no such thing as a free lunch.

There's no public demand for this change, just the demand of a handful of legislators.

And it's worth noting that they can use their campaign accounts, they can use their legislative salaries. They have other means to buy themselves the proverbial free lunch.

We finally will just note that the \$25, had it been indexed for inflation, would only be \$42 today. So the proposed change actually is a significant increase



in excess of the rate of inflation, which we think
defeats the purpose of a de minimis gift rule.

In closing, we believe that, if you adopt our position on these two issues, you close the loophole and you keep the gift limits at their current limits, that this would be fulfilling your constitutional mandate to protect the public interest.

We want to thank you for considering our petition, and this process has taken months, and we want to thank you for trying to strengthen the gift rule. We also want to thank the staff, especially Director Gramitt, who worked with us to come up with the acceptable language that you have in front of you.

So we wish you good luck in your deliberations at your next meeting.

CHAIR JONES: Thank you.

JOHN MARION: Thank.

CHAIR JONES: The next person to come forward as H. Phillip West, Jr.

H. PHILLIP WEST, JR.: Thank you, Chairman Jones and Members of the Commission. It's good to see you. I know some of you from years ago.

I want to speak briefly but seriously this morning. My name is H. Phillip West, Jr. I served 18 years as the director of Common Cause. And I remain



particularly grateful to your chairman because, in 1992, he represented Common Cause pro bono before the Rhode Island Supreme Court in a tremendously important case that connects directly to the rule changes that are on the table before you this morning.

Governor Bruce Sundlun had asked the Supreme Court whether the state constitution granted the Ethics Commission authority to adopt substantial ethics rules; and second, Governor Sundlun had asked the high court whether the rule that was adopted -- the rules that have been adopted in the process were valid, whether the ethics -- sorry, whether the amendment was valid under the Rhode Island and United States constitutions.

The justices quoted your chairman's brief extensively in affirming both points. In other words, that you have the authority to adopt a code of ethics for all public officials and that that authority is valid. In our judgment, that makes this the strongest ethics commission in the United States, bar none.

I testify this morning as a private citizen, not on behalf of Common Cause, but I strongly affirm the Common Cause proposal to close this lobbyist loophole that allows public officials to accept large public gifts from certain groups of lobbyists.

I retired from Common Cause 19 years ago,



after a cancer diagnosis. Thankfully, that was resolved. And I have been back, over a number of years, at the State House as a volunteer lobbyist for the Village Common of Rhode Island, which is an organization that we started 10 years ago that helps older adults stay safely in their homes.

And in working, in lobbying on behalf of the Village Common, I had a chance to meet, again, a whole group of lobbyists, former legislators, who I had known when they were legislators. I knew Representative Rabideau. And I got a chance to look at them and I couldn't look, in preparation for today, I couldn't look at the whole 606 lobbyists, so I picked out 14, all of the former legislators who are currently working as lobbyists.

And here's the problem that I think that the Common Cause proposal seeks to address, and that really is a practical problem for legislators at the State House. It's very difficult for legislators to tell who is an interested person. In fact, it's almost impossible. Lobbyists have a simple lobbyist badge that has their name and a number and nothing else. There's no indication as to whom, when I'm lobbying, who I'm lobbying for. And unless I tell legislators, they have no way of knowing.



Now, all of this plays into the process of the way hearings work at the State House. Committees hear many, many bills, and they often have to restrict the amount of time that anybody can testify on any particular bill, and so, typically, they'll say three minutes.

I appreciate your flexibility this morning,
Mr. Chairman, but this is a very important point because
volunteer lobbyists for nonprofits and advocacy groups
and environmental groups and civil groups, and so on,
get their three minutes, and most of them put in a
written statement, also, because they want to make sure
that they're on the record, which everything -- with
everything that is important.

Now, there's a whole group of lobbyists that doesn't do that and that's the former legislators and some of the other professional lobbyists. I searched diligently to find any written record of the positions of these professional lobbyists. I used ChatGPT, I used Gemini, I went through lots of the individual files, and I couldn't find any, not one.

Now, there may be some, but I couldn't find any, of written testimony from any of those 14 lobbyists on any particular bill that they were trying to influence. And I think that that's really significant



1 because there's a lot of money at stake.

You have the record there. I created a spreadsheet and you have it, and you have it electronically. So you can -- I invite you to double-check what I have compiled and see if you agree with these lists of what lobbyists have reported.

But the point is that these lobbyists are making a lot of money, a lot of money. By my tabulation of what they made in the spring of 2025, these 14, by themselves, brought in over \$3.5 million. \$3.5 million to 14 lobbyists. Now, that's only the ones who were former legislators.

Those 14 reported in their lobbyist disclosure reports making more than \$84,000 worth of campaign contributions. And anybody who's a lobbyist at the State House gets deluged with invitations to campaign fundraisers, and most of the nonprofit lobbyists, like myself, can't afford to go to them. I'm a volunteer. But these paid lobbyists go and they give generously.

Now, I'm making a connection here because what happens is they get something back. They have access to those legislators, the current legislators, and I think it makes a difference. I really think it makes a difference. That's when they talk to them and that's when they get things done.



I would propose to say one final thing to you. These former legislators are skilled at public speaking, and as I watch them at the State House, they mingle cordially with legislators on the floor of the House, of the Senate, and in the hallways. They meet legislators often privately in their legislative offices. They attend these common -- these frequent fundraisers, and they guide their clients in submitting written testimony.

But here's the important point. They largely conceal what they are lobbying for from the press and from the public, and that makes it very difficult for other organizations to even know what they are trying to accomplish.

And I would give just one example and that would be the Liquor Dealers Association that has, year after year after year, successfully killed a bottle bill that would stop the dropping of these little nips that fill the waterways. And I'm not going to get into that argument at all, it's not important.

But the point is, here is the Liquor Dealers
Association, there are many other associations, which
are technically nonprofits, and that those lobbyists are
able to evade this Gift Rule because of the structure.

So I would urge you to adopt the proposal that



L	Common Cause has offered to you that all registered
2	lobbyists, and all the entities that pay them, be
3	recognized as interested persons under the law.

And I, secondly, I would urge that you reject the increase. I don't think this matters quite so much, but I would reject that increase. They don't need any more opportunities to be closeted with legislators.

So thank you very much for your time, and I hope you'll get a chance to look at this.

Mr. Chairman?

CHAIR JONES: I just want to comment, I think, other Commissioners may care to weigh in.

I'm not clear if what you're talking about are campaign contributions by lobbyists because those are not within our jurisdiction.

H. PHILLIP WEST, JR.: Absolutely not. And I agree with you 100 percent. Those are completely independent.

What we're talking about is the lunch, the soccer game, the baseball game, those private occasions when the lobbyists sit down with the legislator privately or meet in an office privately.

My point is these lobbyists, for the most part, are not saying to legislators publicly, in public hearings or in writing, here's what I want you to do.



They're doing that in private. And you don't need to give them more opportunities.

Glad to answer any questions. Thank you.

CHAIR JONES: Thank you.

The next person on the list, again, names are hard for me, but I believe this is Kathleen Odean.

KATHLEEN ODEAN: I'm Kathleen Odean. I'm from North Kingstown. I will be one of the one-minute speakers.

And I'm just speaking because I feel strongly about this, which is the only reason, since I'm retired, that I actually drove up from North Kingstown this morning in a remarkable amount of traffic to speak to you.

And I just want to say I hope you will extend the rule that you already have for lobbyists that public officials cannot take unlimited gifts from any lobbyists. I can't think of any reason that they should be able to. I can't think of why public officials should have personal gain from their jobs through these gifts that might influence their decisions, leave them with a sense of obligation.

I was a public librarian for four years in California. No one gave me any gifts, and I did my job as well as I could.



1	So you have the power to strengthen this rule,
2	change it, make it stronger, to strengthen good
3	government in Rhode Island, and I hope you'll do that.
4	CHAIR JONES: Thank you.
5	KATHLEEN ODEAN: Slightly under one minute.
6	Thank you.
7	CHAIR JONES: We'll forgive you.
8	The next name on the list is Patrick Laverty.
9	PATRICK LAVERTY: I'll also be quick for you.
10	So good morning. My name is Patrick Laverty. I live in
11	Lincoln. Thank you so much for doing this.
12	I'm also in support of the changes that Common
13	Cause is putting forward, and let me tell you why.
14	For my job, I frequently travel around the
15	country. I'm an IT security consultant. And
16	frequently, when I tell people I'm from Rhode Island,
17	all too often the response is, oh, isn't that where you
18	had that corrupt mayor? And I have to tell them, yeah,
19	but he's done.
20	So for me, this is all about perception, that
21	the whole changes here are going to be good for
22	perception and giving that we are ethical in Rhode
23	Island with our politics.

So the second reason that I have now is ask

any public school teacher what is the limit of gift that



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they can accept? And you're going to hear it somewhere
between \$10 and \$25 because imagine if the students came
in and gave huge gifts to teachers, what perception that
is going to give, that is the expectation in return,
even if none is stated. So shouldn't our public
officials have the same ethical requirements as public
school teachers who can't take gifts over \$10 to \$25
anyway.

So by limiting the gift limit from all lobbyists, interested and otherwise, our Ethics Commission and Rhode Island can do the right thing to ensure proper ethics from our elected leaders.

Thank you so much.

CHAIR JONES: Thank you, sir.

The next name on the list is Jessie Kingston.

JESSIE KINGSTON: Good morning. 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, both personal and for the good of all Rhode Islanders. The amendment I'm addressing today is one of these issues.

From time to time, at the State House, I noticed a specific question would arise that was



referred to the Ethics Commission for a ruling. The
questions I recall all had to do with potential
conflicts of interest. I was glad to learn Rhode Island
had an Ethics Commission. Conflict of interest is at
the heart of the proposed amendment I'm testifying in
support of today.

In order to close the type of thing that has been shown in a recent, rather public, example in Rhode Island to be a serious and dangerous loophole in the Gift Rule as currently written, the language in this rule must be amended so as to be explicit that gifts are limited from all lobbyists and those who employ them, regardless of whether the lobbyists or the lobbyists' clients' 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's my understanding that 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 think globally while acting locally and join other states who have already made this important ruling. I respectfully urge you to rectify



this loophole and pass the proposed amendment.

Thank you for considering my comments.

CHAIR JONES: The next person on the list is Kate McGovern.

KATE MCGOVERN: Good morning. I'm Kate
McGovern and I live in Providence. And this isn't my
testimony, it's just a prop.

I had submitted written testimony, but I wanted to just step up and reiterate it with a couple of comments. And I noted, when I finally read this book, after being a bit puzzled by the legislative system in Rhode Island and how much it differed from my experience when I lived in New Hampshire, and so I wanted to give a shout out to Mr. West again for documenting this and also point out the connection between what he pointed out in this book and how remarkable the existence of this commission is.

As he noted this morning, it is a remarkable achievement and the opportunity to continue to give ethical guidance on so many levels to the state is critical to our democracy, as previous speakers have noted.

So a couple of quick points here. I mentioned my experience in New Hampshire. The legislature there votes on every bill. You're a rep, you introduce a



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1 bill, it's going to get a committee vote. The committee 2 recommends whether or not it ought to pass, not ought to 3 pass, be further studied, and they do real studies. They don't do this sort of hold for study and no one 4 studies it. And then it goes to the full chamber, and the chamber has the opportunity to overturn the 7 committee's recommendation. So it's incredibly 8 transparent.

We got here and it's like, what do you mean there hasn't been a vote on payday lending in a dozen How could that be? It's opaque. The power is concentrated in the leadership, and the decision of whether or not something gets a vote in a committee isn't made by the chair of the committee.

And I learned something, again, from Mr. West, this morning, about how the lobbyists who used to be legislators don't speak on the record on these matters, and that's part of what contributes to it being opaque, which brings us to the question of who's an interested person.

And using two guick examples, an interested person would be a lobbyist who successfully defends that loophole year after year and says, you want to renew my contract so I can do that again, right?

An interested person is also someone like our



1	friend John Marion, who, if he were able to say, we
2	finally got a vote on same-day voter registration being
3	sent to the voters to approve whether or not they would
4	vote for that as a change to the constitution, that
5	would enhance John's reputation. It might help Common
6	Cause's fundraising, and that, all of that qualifies as
7	being an interested person. The outcome of the lobbying
8	is extremely relevant to what happens at the State House
9	and who's an interested person.
10	So again, that was why I wanted to appear
11	today to underscore the previous written testimony I
12	submitted and ask you to support closing the lobbyist
13	loophole. And thank you for your work.
14	CHAIR JONES: Thank you.
15	That is the last of the names on the list, but
16	I'd like to make sure, if there's anybody present in the
17	room, anybody else would like to come forward and speak,
18	it's an open podium now.
19	Seeing none, I guess I will close the public
20	hearing.
21	(The proceedings concluded at 10:00 a.m.)
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## CERTIFICATE OF DIGITAL REPORTER

I, Alec Ricker, a Digital Reporter and Notary Public, within and for the State of Massachusetts, do hereby certify that on September 9, 2025, I digitally reported the proceedings had and the evidence given, together with the objections of counsel and the rulings of the Court thereto, and that said testimony was accurately captured with annotations by me during the proceeding, taken at said time and place.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS THEREOF, I have hereunto set my hand this 19th day of September 2025.

Alec Rícker

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Alec Ricker, Digital Reporter Notary Commission Expires: October 18, 2030



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5	That the foregoing is a complete and true
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7	the testimony and proceedings captured in the above-
8	entitled matter. As the transcriptionist, I have
9	reviewed and transcribed the entirety of the original
10	digital audio recording of the proceeding to ensure a
11	verbatim record to the best of my ability.
12	I further certify that I am neither attorney
13	for nor a relative or employee of any of the parties to
14	the action; further, that I am not a relative or
15	employee of any attorney employed by the parties hereto,
16	nor financially or otherwise interested in the outcome
17	of this matter.
18	IN WITNESS THEREOF, I have hereunto set my
19	hand this 19th day of September 2025.
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22	Nancy E. Krakower
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24	Nancy Krakower, Transcriptionist



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