

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

**IN RE RAYMOND E. GALLISON, JR.**

**COMPLAINT NO. 2007-1**

**INFORMAL RESOLUTION AND SETTLEMENT**

The Respondent, Raymond E. Gallison, Jr., and the Ethics Commission Prosecutor, representing the People of the State of Rhode Island, hereby agree to a resolution of the above-referenced matter as follows, subject to the approval of the Rhode Island Ethics Commission:

**A. Findings of Fact and Admissions**

The parties agree and admit to the facts set forth in Section II of the Investigative Report in this matter, entitled "FACTS," and expressly incorporate the facts stated therein into this Informal Resolution and Settlement. In particular, and without limitation, the parties agree to and admit the following:

1. The Respondent was required to file yearly financial disclosure statements with the Ethics Commission covering calendar years 2000, 2001 and 2002.
2. In calendar year 2000, the Respondent was employed by The College Readiness Program and received total income through that employment in the amount of Twenty Thousand Eight Hundred Thirty Dollars (\$20,830).
3. In calendar year 2001, the Respondent was employed by The College Readiness Program and received total income through that employment in the amount of Fifty Thousand Eight Hundred Thirty-Five Dollars (\$50,835).
4. In calendar year 2002, the Respondent was employed by The College Readiness Program and received total income through that employment in the amount of Thirty Thousand Three Hundred Fifty-Five Dollars (\$30,355).

5. In answer to Question 6 on the yearly financial disclosure statements filed by the Respondent for calendar years 2000, 2001 and 2002, the Respondent did not disclose his aforementioned employment with The College Readiness Program.

**B. Conclusions of Law**

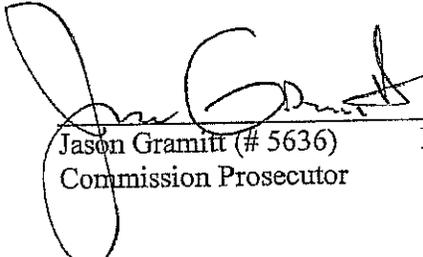
1. The Respondent, a member of the Rhode Island House of Representatives, a state elected position, was at all relevant times subject to the Rhode Island Code of Ethics, including the financial disclosure provisions of R.I. Gen. Laws §§ 36-14-16 and 36-14-17.
2. Section 36-14-16(a)(1) required, for calendar years 2000, 2001 and 2002, the Respondent's filing of a financial disclosure statement in compliance with the requirements of chapter 36-14 of the General Laws.
3. Among the requirements of chapter 36-14 of the General Laws was a "list of all sources of occupational income identified by employer . . . ." R.I. Gen. Laws § 36-14-17(b)(2).
4. In conformity with the aforementioned sections of the General Laws, the financial disclosure forms in use for calendar years 2000, 2001 and 2002 required the listing of "the names of any employer from which you, your spouse, or dependent child received \$1,000 or more gross income during calendar year [2000, 2001 and 2002 respectively]." Financial Disclosure Statements, Question 6.
5. By failing to disclose his employment with The College Readiness Program in his financial disclosure statement filed with the Ethics Commission for calendar year 2000, the Respondent violated R.I. Gen. Laws § 36-14-16.
6. By failing to disclose his employment with The College Readiness Program in his financial disclosure statement filed with the Ethics Commission for calendar year 2001, the Respondent violated R.I. Gen. Laws § 36-14-16.
7. By failing to disclose his employment with The College Readiness Program in his financial disclosure statement filed with the Ethics Commission for calendar year 2002, the Respondent violated R.I. Gen. Laws § 36-14-16.

**C. Penalties and Terms of Settlement**

Pursuant to the above Findings of Fact and Admissions, and Conclusions of Law, the Respondent and the Commission Prosecutor agree, subject to the approval of the Rhode Island Ethics Commission, to the following pursuant to R.I. Gen. Laws § 36-14-13(d):

1. That the Respondent shall pay a total civil penalty of Six Thousand Dollars (\$6,000), attributed to civil penalties in the amount of Two Thousand Dollars (\$2,000) for each of the three violations of R.I. Gen. Laws § 36-14-16 identified in paragraphs (B)(5), (6) and (7) of this Informal Resolution and Settlement; and
2. That the Ethics Commission shall not initiate a referral of these proceedings to the Rhode Island Department of Attorney General.

The above terms represent the full and complete Informal Resolution and Settlement for Complaint No. 2007-1.

  
Jason Gramitt (# 5636)      Date 12-18-07  
Commission Prosecutor

  
Raymond E. Gallison, Jr.      Date 12/18/07  
Respondent

  
Anthony M. Traini (# 4793)      Date  
Counsel for Respondent

**APPROVED** by vote of the  
Rhode Island Ethics Commission  
On December 18, 2007:

  
Barbara R. Binder, Vice Chair      Date 1/03/07

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

IN RE: RAYMOND E. GALLISON, JR.

COMPLAINT NO 2007-01

**INVESTIGATIVE REPORT**

**I. STATUS OF THE CASE**

The instant Complaint was filed on March 15, 2007 by Peter J. Mancini in his capacity as Deputy Chief Investigator of the Rhode Island Ethics Commission. The Complaint alleges that the Respondent, Raymond E. Gallison, Jr. ("the Respondent"), a member of the Rhode Island House of Representatives ("House of Representatives" or "House"), a state elected position, violated the financial disclosure provisions of the Rhode Island Code of Ethics (R.I. Gen. Laws § 36-14-16). In particular, the Complaint alleges that for three consecutive years the Respondent failed to disclose his employment with the College Readiness Program on his yearly financial disclosure statements. It is further alleged that the Respondent received approximately One Hundred Two Thousand Dollars (\$102,000) as a result of this undisclosed employment between calendar years 2000 and 2002.

Pursuant to Regulation 1003, the Commission made an initial determination on April 3, 2007 that that Complaint alleged facts that, if true, were sufficient to constitute violations of the Code of Ethics. Thereafter, this prosecutor and Ethics Commission Deputy Chief Investigator Peter J. Mancini commenced a full investigation into the allegations of the Complaint. Relevant evidence from this investigation for the purposes of the Commission's probable cause determination is detailed below.

## II. FACTS

### A. The Respondent.

The Respondent was first elected to the House of Representatives in November 2000, began serving in January 2001 and has served continually since, representing the towns of Bristol and Portsmouth. Prior to his election to the House, the Respondent served as a member of the Zoning Board of Review for the Town of Bristol, leaving that office in the year 2000. The Respondent is currently a Deputy Majority Leader in the House. He previously served on the House Committee on Finance, and currently serves as Chair of the Committee on Municipal Government, Vice-Chair of the Committee on Environment and Natural Resources, Vice-Chair of the Committee on Veterans' Affairs, and as a member of the Committees on Rules and Separation of Powers.

### B. The College Readiness Program

Leo F. DiMaio ("DiMaio") is the Executive Director of the College Readiness Program, and has been since its inception in 1986. According to DiMaio, he created the College Readiness Program while employed by the University of Rhode Island ("URI") as its Director of the Talent Development Program.<sup>1</sup> DiMaio states that the purpose of the College Readiness Program was to address the needs of potential URI students who were ineligible for acceptance to the university, even through Talent Development, because they had not taken required coursework in high school such as college English, math or foreign language. The College Readiness program offered these courses at no cost to potential students, and, after successful completion of the program, URI would accept the students into the Talent Development program.

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<sup>1</sup> Talent Development at the University of Rhode Island is a program that began in 1968 to recruit, support and retain minority students and those from disadvantaged backgrounds.

At all relevant times until July 1, 2002, the College Readiness Program has been funded by yearly legislative grants that were included by the General Assembly in URI's annual appropriation, but were legislatively earmarked for DiMaio's program. DiMaio, as the program's director, was able to authorize disbursements from the program's URI-maintained account.

Beginning on July 1, 2002, DiMaio caused the College Readiness Program to become operated and administered by a private, non-profit organization he controlled known as Alternative Educational Programming, Inc. ("AEP"). According to DiMaio, he created AEP in 2001 in order to eventually operate the College Readiness Program and several other related programs created by DiMaio, and to receive and administer all sources of program funding including the College Readiness grant. With the creation of AEP and with legislative direction, URI ceased managing the legislative grant funds for College Readiness. Although URI continued to receive the grant as part of its annual appropriation, it disbursed the entire grant amount to DiMaio's AEP.

**C. Respondent's Employment by the College Readiness Program**

According to DiMaio, in June 2000, the Respondent approached him about obtaining employment with the College Readiness Program. DiMaio states that he agreed to hire the Respondent to help coordinate the program and to recruit and interview potential candidates.

**1. Respondent's Failure to Disclose in 2000**

In late June 2000, the Respondent and DiMaio executed a Request for Monthly Payroll form for submission to URI to authorize payment from the College Readiness Program account to the Respondent in the amount of Fifty Thousand Dollars (\$50,000)

over the period of July 1, 2000 through June 30, 2001. A URI Payment Schedule indicates that the Respondent received his first payment for his employment with the College Readiness Program on September 13, 2000 in the amount of Eight Thousand Three Hundred Thirty-Two Dollars (\$8,332). This record indicates that the Respondent received a check in the amount of Four Thousand One Hundred Sixty-Six Dollars (\$4,166) in each of the remaining three months of 2000.

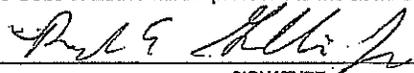
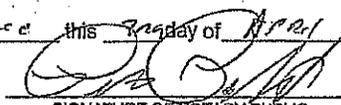
In total, during calendar year 2000 the Respondent received Twenty Thousand Eight Hundred Thirty Dollars (\$20,830) from his employment with the College Readiness Program.

During the year 2000, the Respondent was a member of the Town of Bristol Zoning Board of Review, a municipal appointed position. For that reason, pursuant to R.I. Gen. Laws § 36-14-16, by the last Friday in April 2001 he was required to file a financial disclosure statement with the Rhode Island Ethics Commission. On April 5, 2001, the Respondent's filed his statement for 2000 with the Ethics Commission. Question #6 from that statement and the Respondent's complete answer thereto is reproduced below:

6. List the names of any employer from which you, your spouse, or dependent child received \$1,000 or more gross income during calendar year 2000. If self-employed, list any occupation from which \$1,000 or more gross income was received. If employed by a state or municipal agency, or if self-employed and services were rendered to a state or municipal agency for an amount of income in excess of \$250.00, list the date and nature of services rendered, if the public office or employment listed in #3, above, provides you with an amount of gross income in excess of \$250.00 it must be listed here. (Do Not List Amounts.)

NAME OF FAMILY MEMBER EMPLOYED	NAME AND ADDRESS OF EMPLOYER OR OCCUPATION	DATES AND NATURE OF SERVICES RENDERED
Self	Dept. MHRH Cranston, RI	1/1/00 to 7/15/00 Employee Relations
Self	Attorney 427 Plymouth Ave Fall River	Attorney at Law 7/15/00 to 12/31/0
Spouse	Bristol Schools	-Teacher 1/1 to 12/

The Respondent, before a Notary Public, signed and swore to the accuracy of his answer to Question #6 under penalty of perjury. This certification is reproduced below:

I certify under penalty of perjury, that this Financial Statement is a complete and accurate response to the questions presented as to the financial information and interests during the year 2000 of myself, my spouse, and my dependent children. I acknowledge that I may request an advisory opinion from the Ethics Commission as to my conduct under the Code of Ethics. I understand that a copy of the Code of Ethics will be provided to me at no cost upon request by contacting the Ethics Commission.	
	 SIGNATURE
State of Rhode Island County of <u>Providence</u>	
Subscribed and sworn to before me at <u>Providence</u> this <u>Friday</u> of <u>April</u> , 200 <u>1</u> .	
My Commission expires: <u>12/31/02</u>	 SIGNATURE OF NOTARY PUBLIC
<b>THIS STATEMENT WILL BE RETURNED IF IT IS NOT SIGNED AND NOTARIZED.</b>	

Although the Respondent had been working full-time as an employee for The College Readiness Program for ten months prior to the filing of this financial disclosure statement, and although the Respondent had received income through that employment in the amount of Four Thousand One Hundred Sixty-Six Dollars (\$4,166) per month during that period, and notwithstanding the Respondent's certification under oath as to the accuracy of his answers on the form, the Respondent did not disclose his employment with and services rendered to the College Readiness Program.

On June 9, 2006, over five years after filing his incomplete financial disclosure statement for 2000, the Respondent filed a one-page "Amended Yearly Financial Statement" for the year 2000. This amendment, similarly executed before a Notary Public under the penalty of perjury, added new information in answer to Question #6. This amended answer is reproduced below:

Question 6:		
Name of Family Member Employed	Name and Address of Employer or Occupation	Dates and Nature of Services Rendered
Raymond E. Gallison, Jr.	RI Dept. MHRH Cranston, RI	1-1-00 to 6-30-00 Chief, Employee Relations Officer
	College Readiness Program 80 Washington St Providence, RI	7-1-00 to 12-31-00 Program Coordinator
	Attorney – Self Employed	1-1-00 to 12-31-00

2. **Respondent's Failure to Disclose Employment in 2001**

The Respondent continued his employment with The College Readiness Program into and throughout calendar year 2001. Monthly payroll schedules provided by URI indicate that the Respondent received a check in the amount of Four Thousand One Hundred Sixty-Six Dollars (\$4,166) each month from January 2001 through June 2001, that he received a check in the amount of Four Thousand One Hundred Seventy-Four Dollars (\$4,174) in July 2001, and checks in the amount of Four Thousand Three Hundred Thirty-Three Dollars (\$4,333) each month from August through December 2001.

In total, during calendar year 2001, the Respondent received Fifty Thousand Eight Hundred Thirty-Five Dollars (\$50,835) from his employment with the College Readiness Program.

During the year 2001, the Respondent was a member of the Rhode Island House of Representatives, a state elected position. For that reason, pursuant to R.I. Gen. Laws § 36-14-16, by the last Friday in April 2002 he was required to file a financial disclosure statement with the Rhode Island Ethics Commission. On April 25, 2002, the Respondent

filed his statement for 2001 with the Ethics Commission. Question #6 from that statement and the Respondent's complete answer thereto is reproduced below:

6. List the names of any employer from which you, your spouse, or dependent child received \$1,000 or more gross income during calendar year 2001. If self-employed, list any occupation from which \$1,000 or more gross income was received. If employed by a state or municipal agency, or if self-employed and services were rendered to a state or municipal agency for an amount of income in excess of \$250.00, list the date and nature of services rendered. If the public office or employment listed in #3, above, provides you with an amount of gross income in excess of \$250.00 it must be listed here. (Do Not List Amounts.)

NAME OF FAMILY MEMBER EMPLOYED	NAME AND ADDRESS OF EMPLOYER OR OCCUPATION	DATES AND NATURE OF SERVICES RENDERED
SELF	ATTORNEY (ADMITTED IN RHODE ISLAND) SELF EMPLOYED ONLY	1/1/01 TO 12/31/01
DIANE WIFE	BRISTOL/WARRON Regional Schools	1/1/01 TO 12/31/01

The Respondent, before a Notary Public, signed and swore to the accuracy of his answer to Question #6 under penalty of perjury. This certification is reproduced below:

I certify under penalty of perjury, that this Financial Statement is a complete and accurate response to the questions presented as to the financial information and interests during the year 2001 of myself, my spouse, and my dependent children. I acknowledge that I may request an advisory opinion from the Ethics Commission as to my conduct under the Code of Ethics. I understand that a copy of the Code of Ethics will be provided to me at no cost upon request by contacting the Ethics Commission.

*Russell McLaughlin*  
SIGNATURE

State of Rhode Island  
County of Bristol

Subscribed and sworn to before me at Bristol this 25 day of April 2001

My Commission expires: 12/31/02 *John McLaughlin*  
SIGNATURE OF NOTARY PUBLIC

THIS STATEMENT WILL BE RETURNED IF IT IS NOT SIGNED AND NOTARIZED.

Although the Respondent had been working full-time as an employee for The College Readiness Program for one year and ten months prior to the filing of this financial disclosure statement, and although the Respondent had received income through that employment in amounts ranging from Four Thousand One Hundred Sixty-Six Dollars (\$4,166) to Four Thousand Three Hundred Thirty-Three (\$4,333) per month during that period, and notwithstanding the Respondent's certification under oath as to

the accuracy of his answers on the form, the Respondent did not disclose his employment with and services rendered to the College Readiness Program.

On June 9, 2006, over four years after filing his incomplete financial disclosure statement for 2001, the Respondent filed a one-page "Amended Yearly Financial Statement" for the year 2001. This amendment, once again executed before a Notary Public under the penalty of perjury, added new information in answer to Question #6. It is reproduced below:

I hereby amend my 2001 Yearly Financial Statement as follows:		
Question 6:		
Name of Family Member Employed	Name and Address of Employer or Occupation	Dates and Nature of Service Rendered
Raymond E. Gallison, Jr.	College Readiness Program 80 Washington Street Providence, RI 02903	1-1-01 to 12-31-01 Program Coordinator
	Attorney – Self Employed	1-1-01 to 12-31-01

**3. Respondent's Failure to Disclose Employment in 2002**

The Respondent continued his employment with The College Readiness Program until July 2002 when the program came under the umbrella of DiMaio's Alternative Educational Programming (AEP). Monthly payroll schedules provided by URI indicate that the Respondent received a check in the amount of Four Thousand Three Hundred Thirty-Three Dollars (\$4,333) each month from January 2002 through June 2002, and then a check in the amount of Four Thousand Three Hundred Thirty-Seven Dollars (\$4,337) in July 2002.

In total, during calendar year 2002, the Respondent received Thirty Thousand Three Hundred Fifty-Five Dollars (\$30,335) through his employment with the College Readiness Program.

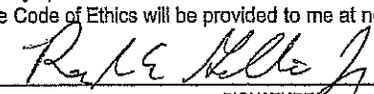
During the year 2002, the Respondent was a member of the Rhode Island House of Representatives, a state elected position. For that reason, pursuant to R.I. Gen. Laws § 36-14-16, by the last Friday in April 2003 he was required to file a financial disclosure statement with the Rhode Island Ethics Commission. On March 31, 2003, the Respondent filed his statement for 2002 with the Ethics Commission. Question #6 from that statement and the Respondent's complete answer thereto is reproduced below:

6. List the names of any employer from which you, your spouse, or dependent child received \$1,000 or more gross income during calendar year 2002. If self-employed, list any occupation from which \$1,000 or more gross income was received. If employed by a state or municipal agency, or if self-employed and services were rendered to a state or municipal agency for an amount of income in excess of \$250.00, list the date and nature of services rendered. If the public office or employment listed in #3, above, provides you with an amount of gross income in excess of \$250.00 it must be listed here. (Do Not List Amounts.)

NAME OF FAMILY MEMBER EMPLOYED	NAME AND ADDRESS OF EMPLOYER OR OCCUPATION	DATES AND NATURE OF SERVICES RENDERED
Raymond E. Gallison, Jr.	Alternative Educational Programming, Inc. 80 Washington St Suite 449 Providence, RI 02903	7/1/02 to present Educational Consul
Diane Gallison	Bristol/Warren Schools 151 State St Bristol	1/1/02 to present Teacher

The Respondent, before a Notary Public, signed and swore to the accuracy of his answer to Question #6 under penalty of perjury. This certification is reproduced below:

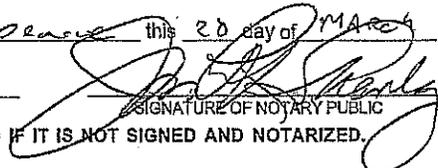
I certify under penalty of perjury, that this Financial Statement is a complete and accurate response to the questions presented as to the financial information and interests during the year 2002 of myself, my spouse, and my dependent children. I acknowledge that I may request an advisory opinion from the Ethics Commission as to my conduct under the Code of Ethics. I understand that a copy of the Code of Ethics will be provided to me at no cost upon request by contacting the Ethics Commission.

  
 \_\_\_\_\_  
 SIGNATURE

State of Rhode Island  
 County of Providence

Subscribed and sworn to before me at Providence this 20 day of MARCH 2003.

My Commission expires: 12/31/04

  
 \_\_\_\_\_  
 SIGNATURE OF NOTARY PUBLIC

THIS STATEMENT WILL BE RETURNED IF IT IS NOT SIGNED AND NOTARIZED.

Although the Respondent had been working full-time as an employee for The College Readiness Program for two years and ten months prior to the filing of this financial disclosure statement, and although the Respondent had received income through that employment in amounts ranging from Four Thousand Three Hundred Thirty-Three (\$4,333) to Four Thousand Three Hundred Thirty-Seven Dollars (\$4,337) per month during that period, and notwithstanding the Respondent's certification under oath as to the accuracy of his answers on the form, the Respondent once again did not disclose his employment with and services rendered to the College Readiness Program.

On June 9, 2006, over three years after filing his incomplete financial disclosure statement for 2002, the Respondent filed a one-page "Amended Yearly Financial Statement" for the year 2002. This amendment, once again executed before a Notary Public under the penalty of perjury, added new information in answer to Question #6. It is reproduced below:

Question 6:		
Name of Family Member Employed	Name and Address of Employer or Occupation	Dates and Nature of Service Rendered
Raymond E. Gallison, Jr.	College Readiness Program 80 Washington Street Providence, RI 02903	1-1-02 to 6-30-02 Program Coordinator
	Alternative Educational Programming, Inc. 80 Washington Street Providence, RI 02903	7-1-02 to 12-31-02
	Attorney – Self Employed	1-1-02 to 12-31-02

### III. DISCUSSION

Initially, as a member of the Town of Bristol Zoning Board of Review in 2000, the Respondent was a municipal appointed official who, by the last Friday in April of 2001, was required to file a financial disclosure statement covering calendar year 2000 in compliance with the requirements of chapter 36-14 of the General Laws. See R.I. Gen. Laws § 36-14-16(a)(5). As a member of the Rhode Island House of Representatives in 2001 and 2002, the Respondent was a state elected official who, by the last Friday in April of 2002 and 2003, was required to file a financial disclosure statement covering calendar years 2001 and 2002 respectively, in compliance with the requirements of chapter 36-14 of the General Laws. See R.I. Gen. Laws § 36-14-16(a)(1).

One of the requirements of chapter 36-14 of the General Laws in each of the three relevant years is that the financial disclosure statement include a "list of all sources of occupational income identified by employer, or if self-employed, by the nature of occupation or profession[.]" R.I. Gen. Laws § 36-14-17(b)(2). See also Commission Regulation 36-14-17001. In conformity with these provisions, the financial disclosure forms in use for calendar years 2000, 2001 and 2002 all contained the following question:

6. List the names of any employer from which you, your spouse, or dependent child received \$1,000 or more gross income during calendar year [2000, 2001 and 2002 respectively]. If self-employed, list any occupation from which \$1,000 or more gross income was received. If employed by a state or municipal agency, or if self-employed and services were rendered to a state or municipal agency for an amount of income in excess of \$250.00, list the date and nature of services rendered. If the public office or employment listed in #3, above, provides you with an amount of gross income in excess of \$250.00 it must be listed here. (Do Not List Amounts.)

As previously discussed, in each of calendar years 2000, 2001 and 2002 the Respondent received \$1,000 or more gross income through his employment with The College Readiness Program. Indeed, the evidence indicates that the Respondent received

Twenty Thousand Eight Hundred Thirty Dollars (\$20,830) in 2000, Fifty Thousand Eight Hundred Thirty-Five Dollars (\$50,835) in 2001, and Thirty-Thousand Three Hundred Thirty-Five Dollars (\$30,335) in 2002.

A review of the financial disclosure statements originally filed by the Respondent for calendar years 2000, 2001 and 2002 confirms that there is no disclosure under question #6 of the Respondent's employment by, or possible receipt of income from, the College Readiness Program. The Respondent did file amendments to these statements on June 9, 2006, disclosing his employment by the College Readiness Program for the period alleged in the Complaint (July 1, 2000 through June 30, 2002). However, these amendments occurred after questions were raised by third parties concerning the Respondent's work for an entity that receives legislative funding.

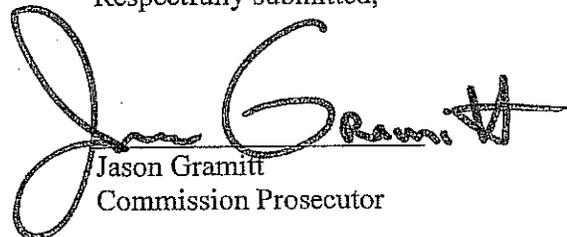
It is submitted that at the time he filed his original 2000, 2001 and 2002 financial statements, the Respondent was fully aware of his obligation to disclose his employment with the College Readiness Program. Indeed, in his original form for 2000 the Respondent knew to list his employment with the Rhode Island Department of Mental Health, Retardation and Hospitals from "1/1/00 to 7/15/00" and his work as an attorney for the entire year. In his original form for 2001 the Respondent again listed his work as an attorney. In 2002, the Respondent disclosed his attorney practice as well as his employment with Alternative Educational Programming, Inc. from "7/1/02 to present." While a failure to disclose his association with the College Readiness Program in a single year might conceivably be viewed as an oversight or even negligence, it is submitted that the Respondent's failure to account for such substantial employment and income (more than \$4,000 per month) over three consecutive years' filings weighs heavily toward a finding of an intentional nondisclosure.

Based upon the above-cited facts and discussion, the Prosecution submits that there is probable cause to believe that:

1. With respect to his 2000 Financial Disclosure Form filed with the Rhode Island Ethics Commission, the Respondent knowingly and willfully failed to disclose his employment with, and his receipt of substantial income from, the College Readiness Program, in violation of R.I. Gen. Laws § 36-14-16.
2. With respect to his 2001 Financial Disclosure Form filed with the Rhode Island Ethics Commission, the Respondent knowingly and willfully failed to disclose his employment with, and his receipt of substantial income from, the College Readiness Program, in violation of R.I. Gen. Laws § 36-14-16.
3. With respect to his 2002 Financial Disclosure Form filed with the Rhode Island Ethics Commission, the Respondent knowingly and willfully failed to disclose his employment with, and his receipt of substantial income from, the College Readiness Program, in violation of R.I. Gen. Laws § 36-14-16.

Dated: **07-30-07**

Respectfully submitted,



Jason Gramitt  
Commission Prosecutor