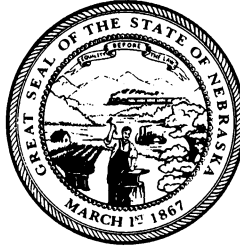


State of Nebraska

Accountability and Disclosure Commission

P.O. BOX 95086
Lincoln, Nebraska 68509
www.nadc.nebraska.gov



Centre Terrace, 1225 L St. #400
Phone (402) 471-2522
Fax (402) 471-6599

June 29, 2023

Suzanne Ideus
5401 South Bristolwood Place
Lincoln, NE 68516

Re: C-2 Potential Conflict of Interest Statement

Dear Ms. Ideus,

This will acknowledge receipt of a C-2, Potential Conflict of Interest Statement ("Statement"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Friday, June 23, 2023. Following our receipt of the Statement, we had a telephone conference with you on June 28, 2023, in which we discussed the matter, and in which you provided us with some additional information.

You are a Procurement Administrator with the Office of Procurement and Grants within DHHS. In your Statement, you have raised the issue of a possible conflict of interest with respect to your daughter. She works for Swanson Russell, which is a firm which may seek to do business with the State of Nebraska through your Office.

Section 49-1499.02 of the Nebraska Political Accountability and Disclosure Act ("NPADA"), addresses potential conflicts of interest by officials or employees of the executive department of state government. That section states, in pertinent part:

"(1) An official or employees of the executive branch of state government who would be required to take any action or make any decision in the discharge of his or her official duties that may cause financial benefit or detriment to him or her, a member of his or her immediate family, or a business with which he or she is associated,...shall [prepare and file a written statement describing the matter and filing the statement with your superior and the NADC]."

In your Statement, you have identified a potential conflict of interest involving your daughter. However, the term "immediate family member" is a defined term within the NPADA as follows:

"Immediate family shall mean a child residing in an individual's household, a spouse of an individual, or an individual claimed by that individual or that individual's spouse as a dependent for federal income tax purposes."

You have advised us that your daughter does not live with you and that she is not an "immediate family member."

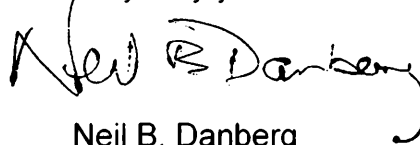
Nonetheless, you have taken steps to ensure that you will not be involved in taking any action or making any decision which might involve doing business with your daughter or her company. While the procedure which you have described in your Statement is not required under the terms of the NPADA, the procedure is clearly designed to avoid even the appearance of conflict of interest with respect to your daughter and her business.

We conclude that, under the circumstances, you are not faced with a potential conflict of interest involving your daughter and her company under the terms of Section 49-1499.02. We further conclude that the procedure which you have adopted, as described in your Statement, appears to avoid even the appearance of a conflict of interest with respect to your daughter and her company.

Our opinion in this matter is premised upon the material facts which we have outlined above. If any of these facts are inaccurate or incomplete, please contact us immediately.

Thank you for your timely filing of the subject Statement. Please contact me directly if you have any questions concerning this opinion.

Very truly yours,

A handwritten signature in black ink, appearing to read "Neil B. Danberg", with a stylized flourish at the end.

Neil B. Danberg
General Counsel