

State of Nebraska

Accountability and Disclosure Commission

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

March 12, 2025

Jason Richters
1217 392nd
Utica, NE 68456



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

Re: C-2A Potential Conflict of Interest Statements

Dear Mr. Richters,

This will acknowledge receipt of two C-2A, Potential Conflict of Interest Statements ("Statements"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Monday, March 10, 2025.

You are a Member of the Centennial Public Schools Board of Education ("Board"). As noted above, you have filed two separate Statements. One of which concerns your spouse, who is a teacher within the Centennial Public Schools District ("District"). It is our understanding that your spouse's salary and wage increases were to be presented to the Board as an agenda item on the March 10th meeting of the Board. The Board was intending to vote on the salary and wage increases at that meeting.

Your second Statement relates to the question of approval of your son's teacher contract with the District. Your son does not reside with you, and he is not, therefore, a member of your immediate family. Your son's contract was also to be presented to the Board for decision at its March 10th meeting.

Under the terms of §49-1499.03(2) of the Nebraska Political Accountability and Disclosure Act ("NPADA"), you must file a Statement, as you have done, where you would be required, "to take any action or make any decision" in the discharge of your official duties that, "may cause financial benefit or detriment to [you], a member of your immediate family, or a business with which [you are] associated."

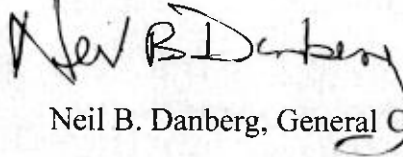
When the Board acts upon the proposed salary for your spouse, this would constitute an action which would cause financial benefit or detriment to your spouse, who is a member of your immediate family. We note that you have stated that you were going to abstain from voting upon your spouse's salary and wage increase at the March 10th meeting. We agree that you should have abstained from taking action upon the contract which sets your spouse's salary since such action may have caused financial benefit or detriment to her. We believe that such abstention would be consistent with the requirements of the NPADA.

However, when the Board acted upon the teacher's contract for your son, he was not an immediate family member, as that term is defined in §49-1425 of the NPADA. Consequently, although you elected to abstain from voting on your son's contract, you would not have been prohibited from voting on that contract under the terms of the NPADA. Nevertheless, public officials who are required to take action with respect to their close relatives, often choose to abstain from such action based upon the appearance of conflict of interest. Thus, as in the case of your abstention with respect to your son's contract, you have thereby avoided the appearance of conflict—even though that abstention is not required by the terms of the NPADA.

In the future, in the event that you need to file a Potential Conflict of Interest Statement, we would request that you file it in sufficient time for us to make a timely response. The Commission does not usually respond to Statements after the potential conflict has already occurred. We have elected to respond in this case because you indicated in both Statements that you were intending to abstain, and we wished to explain the requirements of the NPADA in these situations.

Please call me if you have any questions concerning this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Neil B. Danberg". The signature is written in a cursive, flowing style with some loops and flourishes.

Neil B. Danberg, General Counsel

NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522 https://nadc.nebraska.gov	POTENTIAL CONFLICT OF INTEREST STATEMENT NADC FORM C-2A	POSTMARK DATE <u>3/10/2025</u> <u>EM</u>
		OFFICE USE ONLY RECEIVED MAR 10 2025 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION
BEFORE COMPLETING THIS FORM READ THE FILING REQUIREMENTS ON PAGE 3		

- Any public official of any political subdivision must file this form if he or she has a potential conflict of interest. Additionally, any employee of a political subdivision whose annual salary and benefits exceed \$150,000 must file this form if he or she has a potential conflict of interest.
Exception: Public officials required to file a Statement of Financial Interests (Form C-1) should file Form C-2.
- This form should be filed with the person who normally keeps records for the political subdivision. The form may be filed with the Nebraska Accountability and Disclosure Commission to request an opinion from the NADC.
- Persons who fail to disclose a potential conflict of interest or who otherwise do not comply with the law are subject to penalties.

ITEM 1	NAME, ADDRESS AND TELEPHONE NUMBER
Name <u>Richters Jason Scott</u> Telephone No. <u>402-641-5025</u> Last First Middle	
Address <u>1217 392nd</u> <u>Utica</u> <u>NE</u> <u>68456</u> STREET ADDRESS OR RURAL ROUTE City STATE ZIP CODE	

ITEM 2	TITLE, AGENCY, ADDRESS AND PHONE
Your Title <u>Board of Education (member)</u> Agency <u>Centennial Public School</u>	
Agency Address <u>1301 Centennial Ave. P.O. Box 187 Utica, NE 68456</u>	
Agency Phone <u>402-534-2321</u>	

ITEM 3	DESCRIBE POTENTIAL CONFLICT OF INTEREST IN DETAIL (Use Item 6 Continuation, if necessary)
Date action is to be taken or decision is to be made: <u>3/10/2025</u>	
Description of Potential Conflict: <u>My wife is employed by the school district of which I am a member of the Board of Education. We have an agenda item to approve staff salary and wage increases on the March 10, 2025 agenda. Although we are not approving her wages individually, I will abstain from voting on this agenda item in order to avoid a potential conflict of interest.</u>	

ITEM 4 PERSONS WHO MAY RECEIVE FINANCIAL BENEFIT OR DETRIMENT☐ You☒ Member of your Immediate Family: Nancy Richters

NAME

Business With Which You

☐ Are Associated (See Definitions)

NAME OF BUSINESS

ITEM 5 NATURE OF FINANCIAL BENEFIT OR DETRIMENT

Approval of agenda item will result in a change in wages and benefits.

ITEM 6 CONTINUATION

(SIGNATURE)

(DATE)

NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522 https://nadc.nebraska.gov	POTENTIAL CONFLICT OF INTEREST STATEMENT NADC FORM C-2A	POSTMARK DATE	3/10/2025 EM
		OFFICE USE ONLY DISCLOSURE and NEBRASKA ACCOUNTABILITY MAR 10 2025 RECEIVED	
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ITEM 1	NAME, ADDRESS AND TELEPHONE NUMBER		
Name	Richters Jason Scott		Telephone No. 402-641-5025
	Last	First	Middle
Address	1217 392nd		Utica NE 68456
	STREET ADDRESS OR RURAL ROUTE		CITY STATE ZIP CODE

ITEM 2	TITLE, AGENCY, ADDRESS AND PHONE
Your Title	Board of Education Agency Centennial Public School
Agency Address	1301 Centennial Ave P.O. Box 187 Utica, NE 68456
Agency Phone	402-534-2321

ITEM 3	DESCRIBE POTENTIAL CONFLICT OF INTEREST IN DETAIL (Use Item 6 Continuation, if necessary)
Date action is to be taken or decision is to be made:	3/10/2025
Description of Potential Conflict:	Approval of teacher contract for my son. My son does not reside with my wife and I, but I will abstain from voting on this action item in order to avoid a potential conflict of interest.

Revised July 2024

ITEM 4 PERSONS WHO MAY RECEIVE FINANCIAL BENEFIT OR DETRIMENT☐ You☒ Member of your Immediate Family:Haden James Richters

NAME

☐ Business With Which You☐ Are Associated (See Definitions)

NAME OF BUSINESS

ITEM 5 NATURE OF FINANCIAL BENEFIT OR DETRIMENT

Approval of the teaching contract will result in annual salary and benefits.

ITEM 6 CONTINUATION

(SIGNATURE)



(DATE)

3/10/2025