

# **State of Nebraska**

## **Accountability and Disclosure Commission**

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



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

September 30, 2025

Steve Farris  
17369 RD 54  
Oshkosh, NE 69154

Re: C-2A Potential Conflict of Interest Statement

Dear Mr. Farris,

This will acknowledge receipt of a Potential Conflict of Interest Statement ("Statement"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Tuesday, September 30, 2025. This will also acknowledge our conversations about the Statement on September 29 and 30, 2025.

You are a member of the Garden County Planning and Zoning Commission ("Commission"). Your Commission is considering zoning regulations which would apply to potential wind farms in Garden County.

In your Statement, you note that you are a realtor in Garden County, who specializes in hunting properties in both Nebraska and Colorado. You also note that you are a developer of hunting lands.

§49-1499.03(2)(a) of the Nebraska Political Accountability and Disclosure Act. ("NPADA") provides that if you, as a Commission member, are 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," then you should, as you have done, prepare and file with the NADC a written statement describing the matter.

Your Statement further explains that you believe that wind energy in Garden County would be a financial detriment to the entire County. You also say that you have spoken against wind farms in Garden County in public meetings. However, you believe that your remarks referred to the economic effect which wind energy would have on the entire County, and not any specific property which you own.

Your Statement, as supplemented by our telephone calls, as noted above, does not demonstrate that you have any specific financial interest which would constitute a conflict of interest preventing you from acting as a Commission member in considering

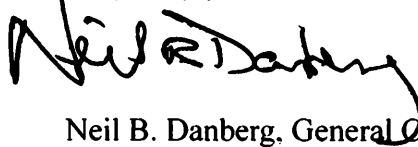
zoning regulations which may apply to wind energy farms. In the absence of such a conflict, you may undertake consideration of the said regulations.

In addressing your Statement, we are relying upon our understanding, as we have expressed it in this letter, of the accuracy and completeness of information and facts which you have provided in your subject Statement and in our subsequent telephone call. If our expressed understanding of these facts is incorrect or incomplete, please advise us immediately.

Thank you for your filing of the subject Statement. Although you have affirmed the accuracy of your Statement in our discussions, I would request that you sign the Statement, and send the signed copy to us..

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". The signature is fluid and cursive, with the first name "Neil" being prominent.

Neil B. Danberg, General Counsel

|                                                                                                                                                                                                                                                                                |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                  |    |  |  |                 |  |                                                                                                          |  |
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| <b>NEBRASKA<br/>ACCOUNTABILITY AND<br/>DISCLOSURE COMMISSION</b><br>P.O. Box 95086<br>Lincoln, NE 68509<br>(402) 471-2522<br><a href="https://nadc.nebraska.gov">https://nadc.nebraska.gov</a><br><br>BEFORE COMPLETING THIS FORM<br>READ THE FILING REQUIREMENTS<br>ON PAGE 3 | <b>POTENTIAL CONFLICT<br/>OF INTEREST<br/>STATEMENT</b><br><br><b>NADC FORM C-2A</b> | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 2px;">POSTMARK<br/>DATE</td> <td style="width: 50%; text-align: center; padding: 2px;">EM</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> <tr> <td colspan="2" style="text-align: center; padding: 5px;">OFFICE USE ONLY</td> </tr> <tr> <td colspan="2" style="text-align: center; padding: 10px;"> <b>RECEIVED</b><br/><br/> <b>SEP 30 2025</b><br/><br/>           NEBRASKA ACCOUNTABILITY<br/>and<br/>DISCLOSURE COMMISSION         </td> </tr> </table> | POSTMARK<br>DATE | EM |  |  | OFFICE USE ONLY |  | <b>RECEIVED</b><br><br><b>SEP 30 2025</b><br><br>NEBRASKA ACCOUNTABILITY<br>and<br>DISCLOSURE COMMISSION |  |
| POSTMARK<br>DATE                                                                                                                                                                                                                                                               | EM                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                  |    |  |  |                 |  |                                                                                                          |  |
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| OFFICE USE ONLY                                                                                                                                                                                                                                                                |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                  |    |  |  |                 |  |                                                                                                          |  |
| <b>RECEIVED</b><br><br><b>SEP 30 2025</b><br><br>NEBRASKA ACCOUNTABILITY<br>and<br>DISCLOSURE COMMISSION                                                                                                                                                                       |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                  |    |  |  |                 |  |                                                                                                          |  |

- 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.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                  |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
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| <b>ITEM 1</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>NAME, ADDRESS AND TELEPHONE NUMBER</b>                                                        |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| <table style="width: 100%;"> <tr> <td style="width: 25%;">Name</td> <td style="width: 25%;">Farris</td> <td style="width: 25%;">Steven</td> <td style="width: 25%;">Matthews</td> <td style="width: 20%;">Telephone No.</td> <td style="width: 20%;">308-778-6705</td> </tr> <tr> <td></td> <td style="text-align: center;">Last</td> <td style="text-align: center;">First</td> <td style="text-align: center;">Middle</td> <td></td> <td></td> </tr> <tr> <td>Address</td> <td colspan="3">17369 RD 54</td> <td>Oshkosh</td> <td>NE 69154</td> </tr> <tr> <td></td> <td colspan="3" style="text-align: center;">STREET ADDRESS OR RURAL ROUTE</td> <td style="text-align: center;">City</td> <td style="text-align: center;">STATE ZIP CODE</td> </tr> </table> |                                                                                                  | Name       | Farris           | Steven        | Matthews                                    | Telephone No.  | 308-778-6705 |              | Last | First | Middle |  |  | Address | 17369 RD 54 |  |  | Oshkosh | NE 69154 |  | STREET ADDRESS OR RURAL ROUTE |  |  | City | STATE ZIP CODE |
| Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Farris                                                                                           | Steven     | Matthews         | Telephone No. | 308-778-6705                                |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Last                                                                                             | First      | Middle           |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 17369 RD 54                                                                                      |            |                  | Oshkosh       | NE 69154                                    |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | STREET ADDRESS OR RURAL ROUTE                                                                    |            |                  | City          | STATE ZIP CODE                              |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| <b>ITEM 2</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>TITLE, AGENCY, ADDRESS AND PHONE</b>                                                          |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| <table style="width: 100%;"> <tr> <td style="width: 50%;">Your Title</td> <td style="width: 50%;">Committee Member</td> </tr> <tr> <td>Agency</td> <td>Garden County Zoning and Planning Committee</td> </tr> <tr> <td colspan="2" style="height: 20px;">Agency Address</td> </tr> <tr> <td colspan="2" style="height: 20px;">Agency Phone</td> </tr> </table>                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                  | Your Title | Committee Member | Agency        | Garden County Zoning and Planning Committee | Agency Address |              | Agency Phone |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Your Title                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Committee Member                                                                                 |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Agency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Garden County Zoning and Planning Committee                                                      |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Agency Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                  |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Agency Phone                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                  |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| <b>ITEM 3</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>DESCRIBE POTENTIAL CONFLICT OF INTEREST IN DETAIL (Use Item 6 Continuation, if necessary)</b> |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Date action is to be taken or decision is to be made: <u>Oct 1, 2025</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                  |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |
| Description of Potential Conflict:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                  |            |                  |               |                                             |                |              |              |      |       |        |  |  |         |             |  |  |         |          |  |                               |  |  |      |                |

I believe I have zero conflict of interest regarding wind farm construction in Garden County. That is to say my opposition to wind farms for Garden County is general and for the entire county or at least a substantial part of it. Among many reasons that I believe Wind is a bad decision for Garden County one of the biggest, and even stated in the comprehensive plan regarding protection of our wildlife resource, is that Wind turbines run a high risk of altering the feeding patterns and usage of migratory waterfowl. And it is my professional opinion, both as a realtor that specializes in hunting properties both in Nebraska and as well Colorado, and also a developer of hunting land, that the area of the country of which contains Garden County, is recognized as, and perhaps is, one of the three or four very best areas for duck hunting in the United States! This is exemplified, by the tourism in the county (the only real tourism) coming from all over the country to hunt waterfowl in Garden County annually, and the land prices of the acres that hold good opportunity for waterfowl hunting... the most expensive in Garden County, and increasing all the time. And that can easily be seen on County Records without taking my word for it. Therefore, when I point out these things due to my actual expertise in the subjects, I can articulate these things very well. And if I've ever spoken about myself, it is as an example, from selling, owning, and benefitting... but only right along with the rest of the community. Anything that affects me, would absolutely affect the entire county, some presidents more than others, but it is a general affect. And I receive many phone calls, emails, texts, and even being stopped on the street, and thanked by residents for fighting their fight, resisting construction of wind farms in Garden County. And pretty simply, they wouldn't thank me, if they didn't recognize what I'm talking about, affects them generally and across the board. And there are other reasons I fight wind. And these reasons usually have very little to do with me, other than the general waterfowl populations due to setbacks I already helped obtain clear back in 2017. Other things such as set back from dwellings, or setbacks from property lines, and even the blinking lights at night being mitigated by technology that turns them only on when aircraft is in the area. But most recently I have fought to get greater setbacks from three wildlife refuges that exist in Garden County. These things are a jewel to the county and again mentioned to protect in the comprehensive plan put into place in I believe the year 2000. In fact, I was instrumental in increasing those wildlife setbacks in 2017 from 1/4 mile to 4 1/2 miles. Right now we as a committee, other than the one vote from the chairman are all in agreement that that setback should be changed to 10 miles. Not only would that help the risk to waterfowl, it also covers a lot of land of which residents live. And we are applauded for it by the community. In conclusion, I have zero contracts or commitments that would swing either way, with or without wind farms. And in the meeting more than once, I've asked for a show of hands of who is for wind, who is against? We usually average about 30 people in every meeting now sometimes many more. But the most I've ever seen for wind is the number three. With 30 some or more saying against. So there's nothing that I have spoken about that affects Steve Farris, that won't affect the community on the whole. And believe you could ask most residents of this county. And they would find great disappointment if I was not to speak on their behalf. Thank you for these considerations.

Revised July 2024

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|---------------|---------------------------------------------------------------|
| <b>ITEM 4</b> | <b>PERSONS WHO MAY RECEIVE FINANCIAL BENEFIT OR DETRIMENT</b> |
|---------------|---------------------------------------------------------------|

☒ You

☐ Member of your Immediate Family: \_\_\_\_\_

NAME

Business With Which You

☐ Are Associated (See Definitions) \_\_\_\_\_

NAME OF BUSINESS

|               |                                                 |
|---------------|-------------------------------------------------|
| <b>ITEM 5</b> | <b>NATURE OF FINANCIAL BENEFIT OR DETRIMENT</b> |
|---------------|-------------------------------------------------|

|               |                     |
|---------------|---------------------|
| <b>ITEM 6</b> | <b>CONTINUATION</b> |
|---------------|---------------------|

\_\_\_\_\_  
(SIGNATURE)

\_\_\_\_\_  
(DATE)