

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

January 21, 2026

Craig Thelen
1220 Lincoln Mall, Suite 125
Lincoln, NE 68516

Re: C-2 Potential Conflict of Interest Statement

Dear Mr. Thelen,

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, January 16, 2026. The Statement was supplemented by phone calls which you have had with the undersigned concerning the nature of your Statement.

You are the Executive Director of the Nebraska State Electrical Division ("Division"). Your wife has a business association with an organization known as Leadership Refinement Consulting. Your wife has been engaged by the Board of Directors of the Division to provide leadership training to the Division. The question presented by your Statement is how compensation for your wife's leadership presentations will be addressed by the Division.

Under the terms of §49-1499.02(1) 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."

The term "business" is defined in §49-1407 to include a, "business with which the individual is associated," is defined in §49-1408 to include a business, "...in which the individual is a partner, limited liability company member, director, or officer."

We also note that under the terms of the NPADA, your wife is considered an immediate family member.

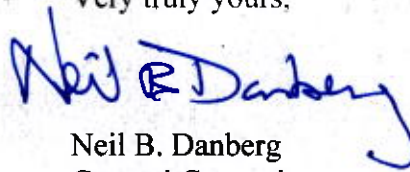
As the Executive Director of the Division, you would typically be in a position to act upon the invoice presented by your wife's business for her leadership training. However,

your action upon the invoice from her business would constitute a decision or action which could result in financial benefit or detriment to your wife and her business. Consequently, you would have a conflict of interest with respect to any such action upon her invoice, and the invoice should be presented to the Board for disposition.

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.

Very truly yours,

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

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-2	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 2px;">POSTMARK DATE</td> <td style="width: 50%; padding: 2px;">EM 1/16/26</td> </tr> <tr> <td colspan="2" style="padding: 2px;">OFFICE USE ONLY</td> </tr> <tr> <td colspan="2" style="text-align: center; padding: 5px;"> RECEIVED JAN 20 2026 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION </td> </tr> </table>	POSTMARK DATE	EM 1/16/26	OFFICE USE ONLY		RECEIVED JAN 20 2026 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION																			
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BEFORE COMPLETING THIS FORM READ THE FILING REQUIREMENTS ON PAGE 3																										
• An official or employee of the executive branch of state government or any other official or employee required to file a Statement of Financial Interests (Form C-1) must file this form if he or she has a potential conflict of interest. • All other public officials who have a potential conflict of interest would file a Potential Conflict of Interest Statement Form C-2A. Additionally, any employee of a political subdivision whose annual salary and benefits exceed \$150,000 must file a Potential Conflict of Interest Statement Form C-2A if he or she has a potential conflict. • File this Potential Conflict of Interest Statement with the Nebraska Accountability and Disclosure Commission and with your immediate superior (if any) whenever a potential conflict of interest situation arises. • 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																									
<table style="width: 100%;"> <tr> <td style="width: 15%;">Name</td> <td style="width: 25%;">Thelen</td> <td style="width: 25%;">Craig</td> <td style="width: 10%;">A</td> <td style="width: 20%;">Telephone No.</td> <td style="width: 15%;">402-471-3508</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">3501 Washington St.</td> <td>Lincoln</td> <td>NE 68506</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	Thelen	Craig	A	Telephone No.	402-471-3508		Last	First	Middle			Address	3501 Washington St.			Lincoln	NE 68506		STREET ADDRESS OR RURAL ROUTE			City	STATE ZIP CODE
Name	Thelen	Craig	A	Telephone No.	402-471-3508																					
	Last	First	Middle																							
Address	3501 Washington St.			Lincoln	NE 68506																					
	STREET ADDRESS OR RURAL ROUTE			City	STATE ZIP CODE																					
ITEM 2	TITLE, AGENCY, ADDRESS, PHONE AND SUPERIOR																									
<table style="width: 100%;"> <tr> <td style="width: 40%;">Your Title</td> <td style="width: 20%;">Director</td> <td style="width: 20%;">Agency</td> <td style="width: 20%;">State Electrical Division</td> </tr> <tr> <td>Agency Address</td> <td>1220 Lincoln Mall Suite 125 Lincoln, NE 68508</td> <td>Agency Phone</td> <td>402-471-3550</td> </tr> <tr> <td>Name of Immediate Superior</td> <td>Mike Hunsberger</td> <td>Title</td> <td>Board President</td> </tr> </table>			Your Title	Director	Agency	State Electrical Division	Agency Address	1220 Lincoln Mall Suite 125 Lincoln, NE 68508	Agency Phone	402-471-3550	Name of Immediate Superior	Mike Hunsberger	Title	Board President												
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Name of Immediate Superior	Mike Hunsberger	Title	Board President																							
ITEM 3	DESCRIBE POTENTIAL CONFLICT OF INTEREST IN DETAIL (Use Item 7 Continuation, if necessary)																									
Date action is to be taken or decision is to be made: _____																										
Description of Potential Conflict: Tracy Thelen is my spouse and she will be teaching a leadership class to the Inspectors for our Agency.																										

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

NAME

Business With Which You

☒ Are Associated (See Definitions) Leadership Refinement Consulting

NAME OF BUSINESS

ITEM 5 NATURE OF FINANCIAL BENEFIT OR DETRIMENT

Teaching leadership class to the Inspectors that work for the Agency.

ITEM 6 FOR MEMBERS OF THE LEGISLATURE ONLY

If you will not abstain from acting on a matter state why, despite the potential conflict, you intend to vote or otherwise participate.

ITEM 7 CONTINUATION

(SIGNATURE)



(DATE)

1/16/2026