

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

May 29, 2026

Jesse Hough
4021 C Road
Bellwood, NE 68632

Re: C-2A Potential Conflict of Interest Statement

Dear Mr. Hough,

In our correspondence to you of May 15, 2026, we acknowledged receipt of a Potential Conflict of Interest Statement ("Statement"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Monday, March 23, 2026.

In that earlier correspondence, we noted that you are a Member of the Butler County Planning Commission ("Planning Commission"). In that correspondence we further noted that we understood that you had an easement contract with Farmland Partners for a potential transmission line on the Bellwood Solar Project, which would be located, at least in part, in Butler Country. The said easement would have represented a potential use of your land for said Project. Consequently, we concluded in our correspondence to you of May 15th, that you would have a conflict of interest on matters coming before the Planning Commission related to solar energy.

After sending the referenced correspondence to you, we were contacted by your attorney, Steve Mossman. He requested that we speak with you and with him about the facts we had stated in the subject correspondence. We arranged for such a telephone call on Thursday, April 21st.

During that call, both you and Mr. Mossman represented that the easement which was the subject of our referenced correspondence had been extinguished. You noted that your property upon which the easement resided, had been sold, and that you no longer possessed any easement relating to the Solar Project. You and your attorney further offered to send me a copy of the Warranty Deed showing that the property had been transferred.

Subsequently, on Tuesday, May 26th, Mr. Mossman sent me a copy of the Warranty Deed. The Deed shows that on or about March 28, 2025, the property upon which the easement had existed, was transferred from H-KO Farms, LLC to Cottonwood Valley

Land, LLC. In this regard, we note that you are the Manager and part owner of H-KO Farms, LLC.

In our earlier correspondence, we noted that Section 49-1499.03(2) of the Nebraska Political Accountability and Disclosure Act (“NPADA”) has the following requirement:

“Any public official of any political subdivision not designated in section 49-1493 [which does not include Planning Commission members], 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 take certain prescribed actions].

That Section goes on to state that the person should file the Statement with the person in charge of keeping records for the political subdivision. The said public official may apply to the NADC for any opinion as to whether the person has a conflict of interest, as you have done in your Statement.

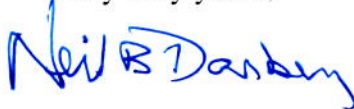
In reviewing the facts in this case, we conclude that your easement which permitted a transmission line related to the Solar Project has now been extinguished by your sale of the property. Since that easement was the basis for our earlier opinion of May 15th, we hereby withdraw that opinion, and, in any event, this opinion would supersede it.

Based upon the foregoing facts and circumstances, it is our opinion that you would not have a conflict of interest under the terms of the NPADA with respect to any action or decision which you would be required to take concerning solar energy issues in Butler County. Accordingly, we conclude that you need not recuse yourself with respect to the Planning Commission’s actions, decisions, or recommendations relating to solar energy issues in Butler County.

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



Neil B. Danberg
General Counsel

State of Nebraska

Accountability and Disclosure Commission

P.O. BOX 95086
Lincoln, Nebraska 68509
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Phone (402) 471-2522
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May 15, 2026

Jesse Hough
4021 C Road
Bellwood, NE 68632

Re: C-2A Potential Conflict of Interest Statement

Dear Mr. Hough,

This will acknowledge receipt of a Potential Conflict of Interest Statement ("Statement"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Monday, March 23, 2026.

You are a Member of the Butler County Planning Commission ("Planning Commission"). You have an easement contract with Farmland Partners for a potential transmission line on the Bellwood Solar Project, which would be located, at least in part, in Butler County. The easement represents a potential use of your land for said Project.

The question which is raised by your Statement is whether you may participate in decisions, actions, or recommendations from the Planning Commission which relate to solar energy development within Butler County.

Section 49-1499.03(2) of the Nebraska Political Accountability and Disclosure Act ("NPADA") has the following requirement:

"Any public official of any political subdivision not designated in section 49-1493 [which does not include Planning Commission members], who would be required to take any action or make any decision in the discharges 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 take certain prescribed actions].

That Section goes on to state that the person should file the Statement with the person in charge of keeping records for the political subdivision. The said public official may apply to the NADC for any opinion as to whether the person has a conflict of interest, as you have done in your Statement.

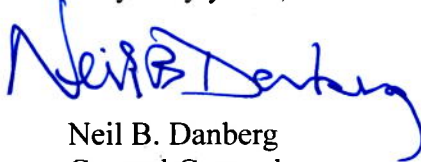
In reviewing the facts in this case, we draw the following conclusions: (a) You own property in Butler County; (2) You have an easement contract with Farmland Partners for a potential transmission line on the Bellwood Solar Project in Butler County; (3) Based upon your Statement, we conclude that Farmland, the Company which has an easement on your property, may, if permitted by Butler County, elect to use the property for renewable or solar energy purposes in the Bellwood Solar Project; (4) You currently have received or will receive payments from Farmland for the easement which you have described; and (5) Payments from Farmland may increase or decrease depending upon decisions made by the Planning Commission and the Butler County Board of Commissioners.

Based upon the foregoing facts and circumstances, it is our opinion that you would have a conflict of interest under the terms of the NPADA with respect to any action or decision which you would be required to take concerning solar energy issues in Butler County. Accordingly, we conclude that you should recuse yourself with respect to the Planning Commission's actions, decisions, or recommendations relating to solar energy issues in Butler County.

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



Neil B. Danberg
General Counsel

NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522 https://nadc.nebraska.gov BEFORE COMPLETING THIS FORM READ THE FILING REQUIREMENTS ON PAGE 3	POTENTIAL CONFLICT OF INTEREST STATEMENT NADC FORM C-2A	POSTMARK DATE EM 3/19/26 OFFICE USE ONLY RECEIVED MAR 23 2026 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION
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- 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																
<table style="width: 100%; border: none;"> <tr> <td style="width: 10%;">Name</td> <td style="width: 40%;">Hough Jesse</td> <td style="width: 10%;">Telephone No.</td> <td style="width: 40%;">970-396-7203</td> </tr> <tr> <td></td> <td style="text-align: center;">Last First Middle</td> <td></td> <td></td> </tr> <tr> <td>Address</td> <td colspan="3">4021 C Road. Bellwood NE 68632</td> </tr> <tr> <td></td> <td 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	Hough Jesse	Telephone No.	970-396-7203		Last First Middle			Address	4021 C Road. Bellwood NE 68632				STREET ADDRESS OR RURAL ROUTE	City	STATE ZIP CODE
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ITEM 2	TITLE, AGENCY, ADDRESS AND PHONE																
<table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">Your Title</td> <td style="width: 35%;">N/A</td> <td style="width: 15%;">Agency</td> <td style="width: 35%;">Farmland Partners</td> </tr> <tr> <td>Agency Address</td> <td colspan="3">4600 S. Syracuse Street Suite 1450, Denver, CO 80237</td> </tr> <tr> <td>Agency Phone</td> <td colspan="3">720-452-3100</td> </tr> </table>		Your Title	N/A	Agency	Farmland Partners	Agency Address	4600 S. Syracuse Street Suite 1450, Denver, CO 80237			Agency Phone	720-452-3100						
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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: _____ Description of Potential Conflict: Ownership and accusation of employment as a consultant. Ownership 11 Shares of 43 Million Shares Issued Termination as a consultant as of April 16, 2018																	

ITEM 4 PERSONS WHO MAY RECEIVE FINANCIAL BENEFIT OR DETRIMENT

xx You

Member of your Immediate Family:

NAME

Business With Which You
Are Associated (See Definitions)

NAME OF BUSINESS

ITEM 5 NATURE OF FINANCIAL BENEFIT OR DETRIMENT

Farmland Partners has a potential easement for transmission line on the Bellwood Solar Project.

ITEM 6 CONTINUATION

(SIGNATURE)

(DATE)

March 19, 2026

11:29



Sign off

All holdings

WELLSTRADE ...0132



Search symbol or...

Filter

Stock X

FPI

\$131.06

FARMLAND

PARTNERS

INC

Stock

Last price \$11.92 +\$0.32

Day change +\$3.58 (+2.80%)

Unrealized +\$64.32 (+96.34%)

Shares 11



Farmland Partners Inc. t (720) 452-3100
4600 S. Syracuse St., Suite 1450 t (720) 398-3238
Denver, CO 80237 www.farmlandpartners.com

April 10, 2018

Jesse Hough
1001 East Louisiana Ave., Suite 209
Denver, CO 80210

Re: Termination of Consulting Agreements and Final Payment

Dear Jesse:

This letter is to inform you that FPI Agribusiness Inc. and Farmland Partners Inc. (collectively the "Company") have elected to terminate the consulting agreements entered into between Jesse J. Hough and FPI Agribusiness Inc., on the one hand and Jesse J. Hough and Farmland Partners Inc., on the other hand with consulting terms commencing on April 16, 2016 (the "Consulting Agreements"). The termination of the Consulting Agreements will take effect on April 16, 2018. Please consider this letter the official prior notification pursuant to Section 3 of the Consulting Agreements.

Enclosed is a full and final payment of \$31,250.00 for your services provided pursuant to the Consulting Agreements. Thank you for your work on behalf of the Company. I wish you the best going forward.

Sincerely,

FARMLAND PARTNERS INC.

A handwritten signature in dark ink, appearing to read "Erica Borenstein", written over a horizontal line.

Erica Borenstein
General Counsel & Secretary, Farmland Partners Inc.

FPI AGRIBUSINESS INC

A handwritten signature in dark ink, appearing to read "Erica Borenstein", written over a horizontal line.

Erica Borenstein
General Counsel & Secretary, FPI Agribusiness Inc.