

SEP 18 2017



STATE OF INDIANA

FILED

Eric J. Holcomb, Governor

September 18, 2017

Mr. James Clevenger, Chair
Indiana State Ethics Commission
315 West Ohio Street, Room 104
Indianapolis, IN 46202

RE: Waiver of Application of 42-1-5-1 (the "Gift Rule") for certain items of value that will be received by BMV staff during meetings held with Harley Davidson in Milwaukee, Wisconsin on September 27-28, 2017.

Chairmen Clevenger:

As the Ethics Officer for the Indiana Bureau of Motor Vehicles ("BMV") and pursuant to the authority invested under 42 IAC 1-5-1(d), I hereby waive application of 42 IAC 1-5-1(a) for Peter L. Lacy, Commissioner, Brittainy Hubble, Director of Central Operations, and Director of Ride Safe Indiana, Jeff Stokes, (together, "BMV staff") to accept food and drink ("meals") from Harley Davidson ("HD"), during meetings to be held in Milwaukee, Wisconsin on September 27-28, 2017. The items of value that will be received by BMV staff are all meals consumed during meetings to be held with HD, with whom the BMV has a business relationship.

The duties of the BMV Commissioner include shaping the strategic vision and direction for the BMV. This includes development and oversight of Ride Safe Indiana, a program that provides rider education to motorcyclists in an effort to decrease fatalities and accidents. The meetings with HD between September 27-28 will cover a tour of HD facilities and will include a broad overview of HD's efforts to address safety for all motorcyclists. The meetings will assist and further augment BMV staff knowledge and background in order to inform BMV's strategic vision in regard to RSI.

Travel and lodging expenses are not covered by this waiver. Commissioner Lacy, Ms. Hubble, and Mr. Stokes should not accept any other item of value from HD or any other person that may have a business relationship with the BMV. Additionally, BMV staff should not accept any item of value from anyone seeking to influence an action by BMV personnel in his official capacity.

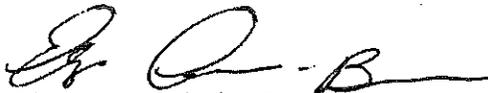
Therefore, it is my opinion that it is consistent with the public interest for BMV staff to accept meals during his meetings to be held with HD, even though payment for these items is being made by an entity that has a business relationship with BMV. Based on this finding, I am hereby waiving application of 42 IAC 1-5-1(a) to the extent set forth in this letter.



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If you need additional information or have any questions about this letter, please feel free to contact me at (317) 232-2915 or at ECampodonico-Barr@bmv.in.gov.

Sincerely,



Elyssa Campodonico-Barr
Chief of Staff and Ethics Officer

Cc: Lori A. Torres, Inspector General
Joseph Hoage, General Counsel, BMV



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Croft, Celeste

From: Campodonico-Barr, Elyssa
Sent: Monday, September 18, 2017 8:14 AM
To: IG Info
Subject: BMV Gift Waivers
Attachments: AAMVA Gift Waiver.pdf; HD Gift Waiver.pdf

To Whom It May Concern:

Attached you will find two waivers of the application of the Gift rule, 42 IAC 1-5-1. Please let me know if you have any questions.

Elyssa Campodonico-Barr

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