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101 W. Washington Street
Indianapolis, Indiana 46204



INDIANA GAMING COMMISSION

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Greg Small
Executive Director

FILED

September 25, 2023

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INDIANA STATE
ETHICS COMMISSION

Katherine Noel, Chairperson
Indiana State Ethics Commission
315 West Ohio Street, Room 104
Indianapolis, Indiana 46204

RE: Waiver of Application of 42 IAC 1-5-1 (the "Gift Rule") for Attendance Fees Received by an Indiana Gaming Commission Employee in Relation to the Annual BSA/AML Gaming Conference in Las Vegas, Nevada from September 11 – 14, 2023

Chairperson Noel:

Greg Small, the appointing authority of the Indiana Gaming Commission ("IGC") has designated authority to me as the agency's ethics officer to waive application of the Gift Rule in individual cases when consistent with the public interest. I am hereby waiving application of 42 IAC 1-5-1(a) for IGC employee Manuel Becker so that he may attend and be a speaker at the Annual BSA/AML Gaming Conference (the "Conference") in Las Vegas, Nevada from September 11 – 14, 2023. Information about the Conference is attached to this letter and can also be found at: <https://bsaamlgamingconference.com/agenda/>. Manuel Becker is an Investigator for the Indiana Gaming Commission, and is tasked with investigating matter related to money laundering and the Bank Secrecy Act.

The Conference will be held at Caesars Palace, 3570 S Las Vegas Blvd., Las Vegas, Nevada 89109. The item of value being received by Mr. Becker in exchange for his participation in the Conference is the registration fee for the entire Conference, a value of \$2,195.00.

This registration fee, which is being paid for all speakers and panel participants, will be paid for by BSA-AML Compliance Group, LLC, the organizer of the event, which may use sponsorship fees from the Conference's various sponsors as the source of payment. Thompson Reuters Corporation is one of the sponsors of the Conference. Thompson Reuters Corporation owns West, a publishing company that provides the Westlaw platform. The IGC has a business relationship with West through a Quantity Purchase Agreement with the State of Indiana for the use of the Westlaw platform.

Mr. Becker has been instructed not to accept any other item of greater than nominal value from Thompson Reuters Corporation, or from any other person, if that person may have a business relationship with the IGC or may seek to influence an action by Mr. Becker in his official capacity. Mr. Becker has also been informed that the safest course of action is to assume that anyone in the private sector attending the Conference could have a business relationship with the IGC.

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During the Conference, Mr. Becker may attend the various educational programs and activities listed on the Conference's agenda. These activities will offer a critical learning experience for Mr. Becker relating to the Bank Secrecy Act and anti-money laundering techniques and strategies. The skills acquired at these programs and events will be useful in the IGC's continuing mission to effectively regulate gaming in the State of Indiana.

Therefore, it is my opinion that it is consistent with the public interest for Mr. Becker to attend and participate at the Conference between September 11 – 14, 2023, and to receive the attendance fee for the Conference for free, even though the source of funds for this fee may be an entity that has a business relationship with the IGC. Based on this finding, I am hereby waiving application of 42 IAC 1-5-1(a) to the extent set forth in this letter.

If you need any additional information or have any questions about this waiver, please feel free to contact me at 317-233-0906 or at ROpat1@igc.in.gov.
Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Opat', is written over a large, faint oval shape that serves as a placeholder or background for the signature.

Bob Opat
License Control Counsel and Ethics Officer, Indiana Gaming Commission

cc: Sean Gorman, Director, Indiana State Ethics Commission
Greg Small, Executive Director, Indiana Gaming Commission

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Katherine Noel, Chairperson
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