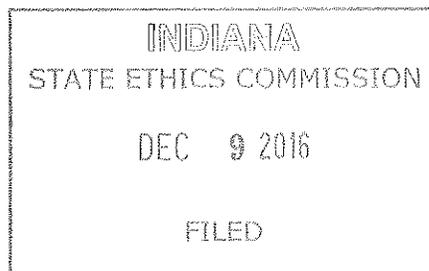


December 9, 2016

Indiana State Ethics Commission
315 West Ohio Street, Room 104
Indianapolis, Indiana 46202



Dear Sirs:

Pursuant to 42 Indiana Administrative Code 1-5-1(c) and as the Indiana Department of Natural Resources' ("Department) Appointing Authority, I waive application of 42 IAC 1-5-1 ("the Gift Rule") as applied to the following employees as such waiver is consistent with the public interest.

Employees:

Phil Bloom, Director, Division of Communications
Jody Kress, Director, Natural Resources Foundation
Marty Benson, Assistant Director, Division of Communications
Jessica Sparger, Assistant Director, Division of Communications
Ginger Murphy, Deputy Director, Division of State Parks
Carl Lindell, Regional Supervisor, Division of State Parks
Michelle Cain, Information Specialist, Division of Fish & Wildlife

Nature and Value of the Gift:

The Association for Conservation Information (ACI) is a non-profit whose mission is to further natural resource conservation and exchange. ACI is comprised of communication professionals representing state, federal, and Canadian wildlife agencies as well as private conservation organizations. Further information regarding ACI can be found at <http://www.aci-net.org/>. Department Communications staff has participated in ACI for the past decade.

The ACI holds an annual conference which is hosted by one of the participating states. Indiana has been selected to host the 2017 Conference ("Conference"), which is occurring on July 9 – 13, 2017. The Conference agenda consists of stimulating keynote speakers, professional skills development workshops, informational sessions on technology and trends, roundtable discussions, constructive work critiques, and field trips that showcase natural resource assets of the host state.

As host, the Department and the Natural Resources Foundation ("Foundation") will be responsible for overseeing all aspects of the Conference. The Department will handle the logistics of the Conference (i.e. organizing programming, meals, lodging, travel, etc. . .), while the Foundation will contract with the outside vendors, collect all fees, and pay all invoices. Attendees will pay for their own transportation, lodging, meals, and registration fees.

As part of the responsibilities of hosting the Conference, the Department and Foundation will be responsible for organizing outside sponsors. There are varying levels of sponsorship that are made

available to interested parties; further information regarding such opportunities is enclosed. All fees collected from sponsors go directly to support the Conference and the ACI. Any sponsorship fees collected that exceed Conference expenses are directed to the ACI. Neither the State, nor any of its employees, receives any part of said fees and the State does not provide any funding in support the Conference.

Based on information the Department has received from ACI, it is possible that entities that have a business relationship with the Department will seek to sponsor the Conference. In light of the State Ethics Commission's prior decision in 2013 involving the Indiana Utility Regulatory Commission, No. 13-I-34 ([http://www.in.gov/ig/files/opinions/2013/s13-I-34_IURC-G_SP_GE\(1\).pdf](http://www.in.gov/ig/files/opinions/2013/s13-I-34_IURC-G_SP_GE(1).pdf)) the Department considered it prudent and in the interest of complete transparency to seek a waiver. It should be noted that contrary to the IURC Commissioner, who was to seek donations, the Department employees will be seeking sponsors for the Conference, all of whom receive a direct benefit for the fees expended as outlined in the attached documentation. No sponsor of the Conference will receive any benefit from the Department, Foundation, or State. The AIC is responsible for all costs associated with the Conference.

Donor of the Gift

The possible donors to the Conference could include entities that have a business relationship with the Department. The Department will not receive any benefit from those that are sponsoring the Conference, as all funds will go directly to the ACI. No sponsor of the Conference will receive any benefit from the Department, Foundation, or State. The Department will handle the monies involved as part of its duties as Host. In many instances, the entities that have a business relationship with the Department are long-time sponsors of the AIC.

The Department will update this filing with the Ethics Commission once the donor list for the Conference has been finalized. The updated filing will list all those entities that sponsored the Conference and have a current business relationship with the Department. It is anticipated that the updated filings will be submitted the Commission in July 2017.

Public Interest

The Department and its employees have participated with the ACI and attended its conferences for a number of years. Based on this long-standing participation with ACI and ACI's desire to see all the great things that Indiana and the Department have to offer, Indiana was selected as the 2017 Conference Host.

The Department, State, and the Foundation will not receive, or provide, any funding in support of the Conference. No Department or Foundation employee will receive any financial benefit by agreeing to assist in the responsibilities in hosting the Conference. Those sponsors, some of whom may have a business relationship with the Department, will not be donating funds to the ACI and/or the Conference. They will be paying a sponsorship fee to advertise their goods and services to those attending. The Department will make clear to the any sponsor that they will receive no benefit from the State for participating as a sponsor for the Conference.

The ACIs mission and initiatives to further natural resource conservation and exchange are completely in line with those of the Department and Foundation. The Department's communications professionals have been proud members and supporters for countless years. As part of this support,

Indiana was selected as host for the 2017 Conference. As it has in the past and will continue in the future, the Department will abide by all laws dealing with respect to the purchase of goods and services. No entity with a business relationship with the Department will receive any benefit from the Department for sponsoring the Conference. As provided, in many instances the possible sponsors with a business relationship with the Department have a long history of sponsoring prior ACI conferences.

In closing and for the reasons stated, I believe it is in the public interest to issue a waiver of the applicability of the Gift Rule as it pertains to the sponsorships received by the Department, on behalf of the ACI, for the 2017 Conference.

Sincerely,

A handwritten signature in black ink, appearing to read "Cameron F. Clark". The signature is fluid and cursive, with the first name being the most prominent.

Cameron F. Clark
Director

SPONSORSHIP OPPORTUNITIES

Title Sponsor

This overarching opportunity helps underwrite overall conference expenses not covered by other sponsorships, such as the opening night welcome reception, shuttle service for attendees from Indianapolis airport to conference site, transportation needs on-site and for field trips, any fees associated with field trips, audio/visual logistics, signage materials, program design and printing, etc.

\$10,000

- Recognition in conference title (e.g., ACI Conference sponsored by The Widget Corp.)
- 5 free conference registrations
- 5-10 minutes of podium time opening night
- Exhibit booth space
- Logo/banner display during conference
- Two-page recognition in conference program
- Listing/logo on ACI conference website
- Insert opportunity in all registration packets
- Inclusion in conference news release
- Database of attendee mailing addresses
- 1-year ACI Sponsor membership dues

Awards Banquet Sponsor

Wednesday, July 12

The most popular and prestigious ACI conference program is the announcement of the annual awards competition at the final night banquet. The formal dinner program recognizes excellence in more than 25 categories and promotes craft improvement among ACI members.

\$4,000

- 2 free conference registrations
- 5 minutes of podium time at meal
- Exhibit booth space
- Logo/banner display during meal
- Tabletop advertisement(s) at meal
- Full-page recognition in conference program
- Listing/logo on ACI conference website
- Insert opportunity in all registration packets
- Inclusion in conference news release
- 1-year ACI Sponsor membership dues

General Sponsor

An unlimited number of opportunities to support the 2017 ACI Conference and ongoing ACI initiatives to improve member skills and provide the public with natural resource, environmental, wildlife and other information and education. ACI helps train member agency staffs and provides them forums to exchange ideas and new concepts, and to improve skills and craftsmanship to its growing membership.

\$2,500

- 1 free conference registration
- Banner display in exhibitor/vendor area
- Exhibit booth space
- Full-page recognition in conference program
- Listing/logo on ACI conference website
- Insert opportunity in all registration packets
- Inclusion in conference news release
- 1-year ACI Sponsor membership dues

<p>Auction Dinner Sponsor <i>Monday, July 10</i> Get behind one of the truly fun and popular events at an ACI Conference. Trips, park adventures, purchased items and donated items from conference attendees go to the highest bidder. All proceeds go to ACI.</p>	<p style="text-align: center;">\$2,000</p> <ul style="list-style-type: none"> • 1 free conference registration • 5 minutes of podium time at meal • Logo/banner display at meal • Exhibit booth space • Half-page recognition in conference program • Listing/logo on ACI conference website • Insert opportunity in all registration packets • Inclusion in conference news release • 1-year ACI Sponsor membership dues
<p>Lunch Sponsor 3 opportunities (first come, first served):</p> <ul style="list-style-type: none"> • Monday • Tuesday • Wednesday 	<p style="text-align: center;">\$1,500</p> <ul style="list-style-type: none"> • 1 free conference registration • 5 minutes of podium time at selected meal • Logo/banner display at sponsored meal • Half-page recognition in conference program • Listing/logo on ACI conference website • Insert opportunity for attendee giveaway bag • Inclusion in conference news release
<p>Break Sponsor Five opportunities available:</p> <ul style="list-style-type: none"> • Monday AM and PM • Tuesday AM • Wednesday AM and PM 	<p style="text-align: center;">\$500</p> <ul style="list-style-type: none"> • Recognition of sponsorship at break • Recognition in conference program • Listing in conference program • Listing on ACI conference website • Insert opportunity for attendee giveaway bag • Inclusion in conference news release
<p>Hospitality Sponsor Four opportunities available:</p> <ul style="list-style-type: none"> • Sunday night • Monday night • Tuesday night • Wednesday night 	<p style="text-align: center;">\$500</p> <ul style="list-style-type: none"> • Recognition of sponsorship at break • Recognition in conference program • Listing in conference program • Listing on ACI conference website • Insert opportunity for attendee giveaway bag • Inclusion in conference news release
<p>Speaker Sponsor Multiple opportunities available. Call for a list of speakers to support.</p>	<p style="text-align: center;">\$500</p> <ul style="list-style-type: none"> • Recognition of sponsorship at session • Recognition in conference program • Listing in conference program • Listing on ACI conference website • Insert opportunity for attendee giveaway bag • Inclusion in conference news release
<p>Friends of ACI Help support 2017 conference and ongoing</p>	<p style="text-align: center;">\$250</p> <ul style="list-style-type: none"> • Recognition in conference program

ACI programming.

- Recognition on ACI conference website

Sponsor-Defined

ACI views any sponsor support as generous, whether it is monetary, in-kind services, or product (including items for the auction/raffle). Recognition will be included in the conference program.