



CHESTER J. CULVER
GOVERNOR

OFFICE OF THE GOVERNOR

PATTY JUDGE
LT. GOVERNOR

Memorandum

Date: January 31, 2007

To: Charlie Smithson, Executive Director of the Iowa Ethics and Campaign Disclosure Board

From: James C. Larew, General Counsel to the Office of the Governor and Lt. Governor 

RE: Blanket Consent for Sales of Catalogue Items for Executive Branch Employees

Attached is a copy of the blanket consent for sales of catalogue items for executive branch employees to be filed with the Ethics and Campaign Disclosure Board pursuant to Iowa Code section 68B.4B(1) (2003) as amended by SF 2179 (2004). The Office of the Governor and Lt. Governor has taken a blanket consent approach to future sales of catalog items for two reasons:

1. Employees do not ordinarily know 20 days in advance of when such a seal will be made to a lobbyist or lobbyist client; and
2. These situations do not create a conflict of interest because the prices are set and direct commissions are not typically received.

If you have any questions, please contact me by phone at (515) 281-0208 or by e-mail at james.larew@iowa.gov.





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Memorandum

Date: January 31, 2007
To: All IGOV Employees
From: Patrick Dillon, Chief of Staff, Office of the Governor and Lt. Governor
CC: Iowa Ethics and Campaign Disclosure Board
RE: Blanket Consent for Sales of Catalog Items

Any employee intending to sell goods or services must submit a written request for consent to the Chief of Staff at least 20 calendar days in advance of the proposed sale. In situations involving sales of goods or services from catalogs,¹ however, it is often impossible to obtain consent at least 20 days in advance. Accordingly, consent is hereby given for all future catalog sales so long as the following requirements are satisfied:

- The sale does not affect the employee's duties or functions at the office;
- The sale does not include lobbying IGOV;
- The goods or services will not be resold to IGOV; and
- The sale will not result in conflict of interest.

You are encouraged to direct any questions concerning this policy to the Legal Team.

Pursuant to Iowa Code section 68B.4B, a copy of this blanket consent for sales of catalogue items will be filed with the Iowa Ethics and Campaign Disclosure Board.

¹ For example, Silpada and pampered Chef parties and school fundraising activities.

