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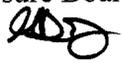


THOMAS J. VILSACK
GOVERNOR

OFFICE OF THE GOVERNOR

STATE CAPITOL
DES MOINES, IOWA 50319
515 281-5211
FAX 515-281-6611

SALLY J. PEDERSON
LT. GOVERNOR

Date: December 28, 2004
To: Charlie Smithson, Executive Director of the Iowa Ethics and Campaign Disclosure Board
From: Gary Dickey Jr., General Counsel to the Office of Governor and Lt. Governor 
Cc: Cynthia Eisenhauer, Interim Chief of Staff
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 catalogue items for two reasons:

1. Employees do not ordinarily know 20 days in advance when such a sale will be made to a lobbyist or a 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.

To my knowledge, Cindy Jones is the only employee from the Office of the Governor and Lt. Governor that has engaged in the type of catalogue sales covered by the blanket consent since section Iowa Code section 68B.4B was amended.

If you have any questions, please contact me by phone at (515) 281-0208 or by email at gary.dickey@iowa.gov.

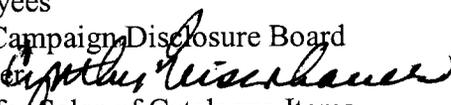


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SALLY J. PEDERSON
LT. GOVERNOR

Date: December 22, 2004
To: All IGOV Employees
Cc: Iowa Ethics and Campaign Disclosure Board
From: Cynthia Eisenhauer 
Re: Blanket Consent for Sales of Catalogue Items

As set forth in the IGOV Employee Manual, 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 catalogues,¹ however, it is often impossible to obtain consent at least 20 days in advance. Accordingly, consent is hereby given for all future sales of catalogue items 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 a conflict of interest.

You are encouraged to direct any questions concerning this policy to the IGOV General Counsel.

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