

FILED

MAY 17 2024

INDIANA STATE ETHICS COMMISSION



ETHICS DISCLOSURE STATEMENT
CONFLICTS OF INTEREST – DECISIONS AND VOTING
State Form 55880 (R / 10-16)
OFFICE OF THE INSPECTOR GENERAL
IC 4-2-6-9

In accordance with IC 4-2-6-9, you must file your disclosure with the State Ethics Commission no later than seven (7) days after the conduct that gives rise to the conflict. You must also include a copy of the notification provided to your agency appointing authority and ethics officer when filing this disclosure. This disclosure will be posted on the Inspector General's website.

Name (last) Howder	Name (first) Aubrey	Name (middle)	
Name of office or agency Department of Transportation - Vincennes District		Job title Project Manager	
Address of office (number and street) 3650 South U.S. Highway 41		City Vincennes	ZIP code 47591
Office telephone number (812) 895-7309	Office e-mail address (required) ahowder@indot.in.gov		

Describe the conflict of interest:
 Aubrey Howder is a Project Manager for the Indiana Department of Transportation - Vincennes District. Aubrey Howder has recently accepted a position with VS Engineering. VS Engineering has a business relationship with INDOT, including active contracts with the Department. Aubrey Howder's employment discussions with VS Engineering creates a decision and voting conflict of interest under IC 4-2-6-9. This disclosure is therefore being filed in anticipation of conflict.

Aubrey Howder is not subject to the mandatory cooling off period (IC 4-2-6-11(b)) with regards to VS Engineering.

Aubrey Howder is subject to the particular matter restriction and will not assist future employers, including VS Engineering, with any matter she personally and substantially participated in on behalf of INDOT. This disclosure was provided to Ms. Howder's appointing authority, Commissioner Michael J. Smith, on May 10, 2024. Evidence of said disclosure to Commissioner Smith is filed herewith pursuant to IC 4-2-6-9(d)(D). Pursuant to IC 4-2-6-9(b)(2), this disclosure was executed and filed with the SEC within seven (7) days of the potential conflict being identified by the below signed Ethics Officer.

CONFLICT OF INTEREST SCREEN FOR AUBREY HOWDER

May 10, 2024

I. RECITALS

WHEREAS, Aubrey Howder is Project Manager for the Indiana Department of Transportation-Vincennes District ("INDOT" or "Department"); and

WHEREAS, Aubrey Howder recently accepted an employment offer with VS Engineering ("VS"); and

WHEREAS, VS has a business relationship with INDOT, including active contracts; and

WHEREAS, as Project Manager for INDOT Vincennes District, it is possible that Aubrey Howder could be assigned to participate in matters in which VS has an interest as part of his regular duties; and

WHEREAS, Aubrey Howder's future employment with VS creates a potential decision and voting conflict of interest under IC 4-2-6-9 requiring disclosure and a formal screen; and

WHEREAS, Aubrey Howder is subject to the particular matter restriction (IC 4-2-6-11(a)) and cannot assist future employers, including VS, with any matter she personally and substantially participated in for INDOT; and

WHEREAS, Aubrey Howder may have obtained confidential information in the course of her employment with INDOT and has an affirmative duty to protect such information from disclosure and to refrain from relying on such information for the benefit of herself or future employers.¹

NOW THEREFORE, Aubrey Howder, Project Manager for INDOT, for her remaining tenure with INDOT, or until she discontinues employment negotiations with VS Engineering, agrees to in all ways follow, adhere to, and satisfy the terms of the following Conflict of Interest Screen. Aubrey Howder must adhere to terms three (3) and four (4) regarding the particular matter restriction and confidential information in perpetuity.

II. CONFLICT OF INTEREST SCREEN

1. Aubrey Howder shall not participate in any decision or vote, or any matter related to such decision or vote, in which VS has a financial interest.
2. Aubrey Howder is screened from participating in any present or future contract or other matter involving VS.
3. Aubrey Howder shall not assist any future employers, including VS, with any matter she personally and substantially participated in while employed by INDOT. This restriction applies in perpetuity, for the life of the particular matter.
4. Pursuant to her duty under Ind. Code §5-14-3-10, Aubrey Howder shall not disclose or otherwise rely upon information classified as confidential under Ind. Code §5-14-3-4. This restriction applies in perpetuity, so long as the subject information is deemed confidential.

III. EMPLOYEE AFFIRMATION

I have read and understand the terms of the foregoing Conflict of Interest Screen, and will in all ways follow, adhere to, and satisfy the above stated restrictions on my participation in any decision or vote in which VS Engineering has a financial interest. I understand that the first two (2) terms of this screen terminate upon my leaving the Department or the discontinuation of negotiations with VS, whichever occurs first. I further understand that terms three (3) and four (4) regarding particular matters and confidential information respectively, apply in perpetuity, for the life of each matter and so long as the subject information is deemed confidential. I have shared and discussed this Conflict of Interest Screen and its requirements with my supervisor.

Executed and agreed this 13th day of May 2024, by:



Aubrey Howder, Project Manager
Indiana Department of Transportation- Vincennes District

¹ State employees have an affirmative duty under Ind. Code §5-14-3-10 to protect from disclosure and to refrain from relying upon information defined as confidential under Ind. Code §5-14-3-4.

Baker, Nathaniel P

From: Steele, Michele
Sent: Friday, May 17, 2024 12:33 PM
To: Smith, Michael J
Subject: FW: Conflict of Interest Disclosure - Aubrey Howder
Attachments: Ethics Disclosure Statement - COI - Aubrey Howder- signed.pdf; COI Screen- Aubrey Howder-signed.pdf

Commissioner Smith,

This email is to notify you that a conflict of interest screen and ethics disclosure statement will be filed for Aubrey Howder, an INDOT employee, with the State Ethics Commission.
Thank you,

Michele Steele, J.D., LLM
Director of Compliance and Ethics Officer
Indiana Department of Transportation
100 N. Senate Avenue – Room N758-PQ
Indianapolis, IN 46204
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From: Howder, Aubrey <AHowder@indot.IN.gov>
Sent: Monday, May 13, 2024 9:58 AM
To: Steele, Michele <MSteele@indot.IN.gov>
Subject: RE: Conflict of Interest question

Michele,

Attached are my signed forms. Please let me know if you have any questions or need anything else.

Thank you,

Aubrey Howder
Project Manager