

**MINUTES OF THE MEETING OF  
THE INDIANA STATE ETHICS COMMISSION  
September 12, 2024**

**I. Call to Order**

A regular meeting of the State Ethics Commission (Commission) was called to order at 10:00 a.m. Commission members present were Katherine Noel, Chair; Corinne Finnerty; John Krauss; Sue Anne Gilroy; and Rafael Sanchez. Office of Inspector General (OIG) staff present included David Cook, Inspector General; Tiffany Mulligan, Chief of Staff, Chief Legal Counsel; Regan Perrodin, State Ethics Commission Director; Elaine Vullmahn, Staff Attorney; Hope Blankenberger, Staff Attorney; Mike Lepper, Special Agent; Jason Fajt, Special Agent; and Nathan Baker, Legal Assistant.

Others present were Kate Shelby, Deputy Commissioner, Indiana Department of Transportation; Michele Steele, Ethics Officer, Indiana Department of Transportation; Sarah Rubin, Program Director, Indiana Department of Transportation; Nicole Gardner, Environmental Specialist, Indiana Department of Environmental Management; James French, Ethics Officer, Indiana Department of Environmental Management; Mattheus Mitchel, Compliance and Ethics Specialist, Indiana Department of Revenue; Dan Thomas, Senior Counsel, Indiana Department of Revenue; Sean Evans, Legal Analyst, Indiana Department of Revenue; Dan Mathis, IT Governance Program Manager, Indiana Office of Technology, Jennfier Thuma, General Counsel, Indiana State Comptroller; and Tammera Glickman, Deputy General Counsel, Indiana Department of Administration.

**II. Adoption of Agenda and Approval of Minutes**

Commissioner Krauss moved to adopt the agenda. Commissioner Sanchez seconded the motion, and the Commission passed the agenda (5-0).

Commissioner Finnerty moved to approve the Minutes of the August 8, 2024, Commission Meeting, and Commissioner Sanchez seconded the motion, which passed (5-0).

**III. Consideration of Waiver of Post-Employment Restrictions for Nicole Gardner**

James French, Ethics Officer for the Indiana Department of Environmental Management, presented the proposed Waiver of Post-Employment Restrictions in this matter to the Commission for their approval.

Commissioner Gilroy moved to approve the Waiver subject to requesting party submission and Commission review of an Amended Post-Employment Waiver to include attachment of previously filed Conflicts of Interest Disclosure, and Commissioner Finnerty seconded the motion, which passed (5-0).

**IV. Consideration of Waiver of Post-Employment Restrictions for Sarah Rubin**

Kate Shelby, Deputy Commissioner and Chief Legal Counsel for the Indiana Department of Transportation, presented the proposed Waiver of Post-Employment Restrictions in this matter to the Commission for their approval.

Commissioner Sanchez moved to approve the Waiver, and Commissioner Gilroy seconded the motion, which passed (5-0).

**V. Request for Formal Advisory Opinion**

2023-FAO-005

Dan Mathis, IT Governance Program Manager  
Indiana Office of Technology

Dan Mathis is the Information Technology (IT) Governance Program Manager with the Indiana Office of Technology (IOT) and is requesting the Commission's FAO. Specifically, Mr. Mathis is requesting an opinion from the Commission regarding proposed post-state employment opportunities with two potential employers, an App Firm and a Consulting Firm.

The Commission declined to issue a Formal Advisory Opinion due to lack of a specific set of facts in the circumstances presented by the individual who requested the Formal Advisory Opinion.

Commissioner Finnerty moved to approve the Commission's findings, and Commissioner Sanchez seconded the motion, which passed (5-0).

**VI. State Ethics Director's Report**

Regan Perrodin, State Ethics Commission Director, provided the following information to the State Ethics Commission:

OIG recently took on a Legal Intern for the next few months. Shelby Stouder is in her third year at the McKinney School of Law. Shelby will be learning many of the processes the OIG uses in day-to-day operations, and we hope to provide plenty of real-world experience to help assist in her future endeavors.

The OIG has issued 24 Informal Advisory Opinions (IAOs) since the August Ethics Commission meeting, mostly relating to issues on post-employment, conflicts of interests, and outside employment. Additionally, there seems to have been an uptick in IAO requests since the ethics training launched last week.

OIG continues to work on promulgating the civil penalties rule and on readopting title 42 of the Indiana Administrative Code. We are currently in our public comment period for our readoption of title 42. This period goes through September 20, 2024. Also, we have submitted our new civil penalties rule for review with the Office of Management and Budget. We need their approval to move on to the next steps of beginning our public comment period and scheduling our public hearing for those new rules.

This year's biennial ethics training launched on September 6. OIG's Ethics Officer, Tiffany Mulligan, has contacted the Commissioners with information on how to complete the training. As mentioned last month, the training released it a little bit earlier this year given the upcoming election. All state employees, officers, and special state employees have until October 18 to take it. As new people are onboarded, they will also have 6 weeks to complete the training.

In August the OIG sent out our first newsletter, which I also sent to the Commissioners. This is something we'll send out quarterly, so the next one will be in November.

OIG also continues to provide in-person outreach and training.

Finally, the OIG's Legal and Ethics Conference is scheduled for the afternoon of November 19, 2024. The Conference has been approved for three hours of attorney ethics CLE credit, and we have confirmed all of our participating speakers. The program will have Adrienne Meiring, the Executive Director of the Office of Judicial and Attorney Regulation, speak on the rules of professional responsibility. Cari Sheehan, Assistant General Counsel at Taft Stettinius & Hollister, LLP, will speak on ethics and AI. The OIG will have a panel of ethics officers to discuss creating a culture of ethics in state agencies. And Justice Mark Massa of the Indiana Supreme Court will conclude with a presentation on public integrity and trust.

## **VII. Adjournment**

Commissioner Sanchez moved to adjourn the public meeting of the State Ethics Commission. Commissioner Krauss seconded the motion, which passed (5-0).

The public meeting adjourned at 10:51 a.m.