



**ETHICS DISCLOSURE STATEMENT  
CONFLICTS OF INTEREST – DECISIONS AND VOTING**  
State Form 55860 (R / 10-15)  
OFFICE OF THE INSPECTOR GENERAL  
IC 4-2-6-9

**FILED**

**NOV 1 2023**

**Reset Form**

**INDIANA STATE  
ETHICS COMMISSION**

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) Brooks	Name (first) Jeffrey	Name (middle)
Name of office or agency Indiana Department of Transportation		Job title Deputy Commissioner and Chief Operations Officer
Address of office (number and street) 100 North Senate Ave. Room, N758		City Indianapolis
		ZIP code 46204
Office telephone number ( 765 ) 617-8735	Office e-mail address (required) jbrooks27@indot.in.gov	

Describe the conflict of interest:  
Jeffrey Brooks is the Deputy Commissioner and Chief Operations Officer for the Indiana Department of Transportation. Jeffrey Brooks is in negotiations with Interstate Business Solutions to accept a position as its' President to begin 12/1/23. Interstate Business Solutions has a business relationship with INDOT, including active contracts with the Department. Jeffrey Brooks's employment negotiations with Interstate Business Solutions has created a potential decisions and voting conflict of interest under IC 4-2-6-9. This disclosure is therefore being filed in anticipation of that potential conflict. Jeffrey Brooks is seeking a formal ethics opinion from the State Ethics Commission as to whether he is subject to multiple ethics restrictions including the particular matter restriction or a mandatory cooling off period. Until the SEC provides a decision, Jeffrey Brooks has agreed to and executed a formal screen. Said screen prohibits Jeffrey Brooks from working with Interstate Business Solutions in his capacity as an INDOT employee, including exercising any of his official duties or otherwise participating in any decision or vote, or matter related to such decision or vote, involving Interstate Business Solutions, or in which Interstate Business Solutions has an interest. Jeffrey Brooks has agreed to be further screened from assisting any future employer, including Interstate Business Solutions, with any matter in which he personally and substantially participated while employed by INDOT. This screen can be revised, as needed, after the State Ethics Commission issues its decision.

This disclosure was provided to Jeffrey Brooks's appointing authority, Commissioner Michael J. Smith, on October 31, 2023. Evidence of said disclosure to Commissioner Michael J. Smith is filed herewith pursuant to IC 4-2-6-9(b)(2)(D) Pursuant to IC 4-2-6-9(b)(2), this disclosure was executed and filed with the SEC within seven days (7) of the potential conflict being identified by the below signed ethics officer.

Describe the screen established by your ethics officer: *(Attach additional pages as needed.)*

The screen was executed on October 31, 2023, a copy of which was sent to Commissioner Michael J. Smith along with this disclosure.

**AFFIRMATION**

Your signature below affirms that your disclosures on this form are true, complete, and correct to the best of your knowledge and belief. In addition to this form, you have attached a copy of your written disclosure to your agency appointing authority and ethics officer.

Signature of state officer, employee or special state appointee

Date signed (month, day, year)

October 31, 2023

Printed full name of state officer, employee or special state appointee

Jeffrey Brooks

**FOR ETHICS OFFICER USE ONLY**

Your signature below affirms that you have reviewed this disclosure form and that it is true, complete, and correct to the best of your knowledge and belief. You also attest that your agency has implemented the screen described above.

Signature of ethics officer

Date signed (month, day, year)

October 31, 2023

Printed full name of ethics officer

Kate Shelby



## CONFLICT OF INTEREST SCREEN

October 31, 2023

### I. RECITALS

WHEREAS, Jeffrey Brooks is the Deputy Commissioner and Chief Operation Officer for the Indiana Department of Transportation ("INDOT" or "Department"); and

WHEREAS, Jeffrey Brooks is considering potential employment with Interstate Business Solutions, a litter collection company, and

WHEREAS, Interstate Business Solutions has business relationship with INDOT, including active contracts; and

WHEREAS, as Deputy Commissioner for INDOT, it is possible that Jeffrey Brooks could possibly participate in matters in which Interstate Business Solutions has an interest as part of his regular duties; and

WHEREAS, Jeffrey Brooks's employment negotiations with Interstate Business Solutions created a potential decision and voting conflict of interest under IC 4-2-6-9 requiring disclosure and a formal screen; and

WHEREAS, pending final decision by the State Ethics Commission, Jeffrey Brooks is subject to the particular matter restriction (IC 4-2-6-11(a)) and cannot assist future employers, including Interstate Business Solutions, with any matter he personally and substantially participated in for INDOT; and

WHEREAS, Jeffrey Brooks may have obtained confidential information in the course of his 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 himself or future employers.

NOW THEREFORE, Jeffrey Brooks, Deputy Commissioner and Chief Operations Officer for INDOT, for his remaining tenure with INDOT, or until he discontinues employment negotiations with Interstate Business Solutions, agrees to in all ways follow, adhere to, and satisfy the terms of the following Conflict of Interest Screen. Jeffrey Brooks 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. Jeffrey Brooks shall not participate in any decision or vote, or any matter related to such decision or vote, in which Interstate Business Solutions has a financial interest.
2. Jeffrey Brooks is screened from participating in any present or future contract or other matter involving Interstate Business Solutions.
3. Jeffrey Brooks shall not assist any future employers, including Interstate Business Solutions, with any matter he personally and substantially participated in while employed by INDOT. This restriction applies in



perpetuity, for the life of the particular matter.

4. Pursuant to his duty under Ind. Code §5-14-3-10, Jeffrey Brooks 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 Interstate Business Solutions 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 Interstate Business Solutions, 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, the Commissioner Michael J. Smith, for INDOT.

Executed and agreed this 31st day of October 2023, by:

 10/31/2023

Jeffrey Brooks, Deputy Commissioner and Chief Operations Officer  
Indiana Department of Transportation

**Baker, Nathaniel P**

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**To:** Shelby, Kate  
**Subject:** RE: INDOT executed COI disclosure and screen (Jeffrey Brooks)

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**From:** Shelby, Kate  
**Sent:** Wednesday, November 1, 2023 11:29 AM  
**To:** Smith, Michael J <[Michael.Smith@indot.IN.gov](mailto:Michael.Smith@indot.IN.gov)>  
**Subject:** notice of employee screen and conflict of interest disclosure

Commissioner Smith,

Pursuant to the notice requirements of Ind. Code 4-2-6-9(b), please find the attached conflict disclosure and internal screen executed by INDOT employee Jeffrey Brooks. The disclosure and screen, along with this notice, will be filed with the Indiana Ethics Commission in satisfaction of the same.

Please let me know if you have any questions.  
Thank you,

**Kate Shelby**  
*Deputy Commissioner and Chief Legal Counsel*  
Indiana Department of Transportation  
100 North Senate Ave., N758 — EX  
Indianapolis, IN 46204  
**Office:** (855)463-6848  
**Email:** [kshelby@indot.in.gov](mailto:kshelby@indot.in.gov)

