

JAN 09 2025

INDIANA STATE  
ETHICS COMMISSION

IC 4-2-6-11

**Post-employment waiver**

As the Appointing Authority of the **Indiana Economic Development Corporation (IEDC)**, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to **John Cochran** in his/her post-employment with **The Corydon Group**.

I understand that I must file and present this waiver to the State Ethics Commission at their next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

- A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of *(Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving)*:

- ☒ IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.
- ☐ IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.
- ☐ IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.
- ☐ IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker. *(Please provide a brief description of the specific particular matter(s) to which this waiver applies below):*

B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.

1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts: The former employee's prior job duties at the IEDC involved primarily communications with local officials and state legislators. Communications included providing updates and answering questions related to economic development in general, specific economic development projects, information about how cash funds for use by the IEDC are spent. During the legislative session, the former employee advocated for or opposed legislation regarding the IEDC and was a point of contact for the IEDC with the members and staff of the General Assembly. During employment at the IEDC, the former employee did not participate in exercising decision-making authority over IEDC contracts, rules, or policies.
2. Please describe the nature of the duties to be performed by the employee for the prospective employer: Following the termination of his employment with the IEDC on November 7, 2024, the former employee has been employed as the Senior Advisor, Procurement & Government Affairs at the public affairs and government relations firm The Corydon Group. He now seeks to expand his current responsibilities to include lobbying members of the Indiana General Assembly on behalf of clients. These legislative lobbying activities would involve multiple clients with a wide variety of issues, including transportation, public safety, local government, and information technology. Prior to the former employee's employment at the IEDC, he had over 20 years of professional experience working within the General Assembly as well as a legislative lobbyist. A secondary responsibility includes conducting grass tops advocacy and lobbying activities with local officials on a variety of issues. During the course of his employment at the IEDC, the former employee had some interaction with staff in the Governor's Office during legislative sessions but had almost no interaction with other executive branch agencies.
3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee: The former employee does not intend to, nor does he seek a waiver to conduct executive branch lobbying activities with the IEDC within 365 days of his employment there. As such, the IEDC will not have discretion to make decisions based on the former employee's work product. The former employee seeks to be able to conduct executive branch lobbying activities in other state agencies with which he has past employment experience or experience lobbying. In the years prior to his employment at IEDC, the former employee has past work experience in both the Secretary of State's Office

and in the Indiana Department of Transportation. Moreover, he has over five years of professional experience of actively lobbying other agencies like INDOT, IDEM, IOT, and DNR.

4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest: The former employee seeks the ability to provide government relations services to potential clients based on more than 20 years of experience working in or lobbying executive branch offices, and not based on any experiences, relationships, or knowledge obtained specifically from his most recent employment at the IEDC. The ability to bring knowledge of executive branch agencies and processes based on the former employee's aggregate professional experience before working at the IEDC to help clients who wish to interact with government efficiently would be to the benefit of the state. Furthermore, given the specific circumstances of the former employee, this waiver request poses little to no risk of contradicting what is in the public interest.
5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied: The former employee's current job responsibilities do not include executive branch lobbying activities. Executive branch lobbying, however, is a significant part of a full-service government relations scope of services and would limit the services he would be able to perform for clients and limit his marketability as a government relations professional. As a result of the 1 year cooling off period, his potential clients and therefore income would be significantly diminished in 2025.


The former employee seeks to waive the 1-year cooling off period for executive branch lobbying so that he can return to executive branch lobbying in agencies in which he has extensive experience lobbying experience. The risk that his position, job description, or responsibilities at the IEDC would give him an improper or unfair advantage in lobbying the executive branch within a year of employment is mitigated as he does not seek to participate in economic development lobbying and considering the timing of his request in relation to a new Governor Administration starting in January of 2025.

### C. Signatures

1. Appointing authority/state officer of agency

By signing below I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an

employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.

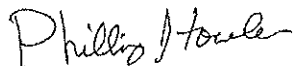
  
\_\_\_\_\_  
David Rosenberg

12.30.2024

\_\_\_\_\_  
DATE

2. Ethics Officer of agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).

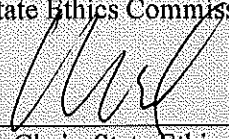
  
\_\_\_\_\_  
Phil Fowler

DATE

12.30.2024

\_\_\_\_\_

D. Approval by State Ethics Commission

<b>FOR OFFICE USE ONLY</b>	
Approved by State Ethics Commission	
	1-9-25
_____ Katherine Noel, Chair, State Ethics Commission	_____ Date

Mail to:  
Office of Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202  
OR  
Email scanned copy to: [info@ig.in.gov](mailto:info@ig.in.gov)

*Upon receipt you will be contacted with details regarding the presentation of this waiver to the State Ethics Commission.*