



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue

Phone: 317 232-5095

Michael Braun, Governor

Room N725

Kent Abernathy, Commissioner

FILED

March 12, 2025

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INDIANA STATE
ETHICS COMMISSION

Katherine Noel, Chair
Indiana State Ethics Commission
315 West Ohio Street, Room 104
Indianapolis, Indiana 46202

RE: Waiver of Application of 42 IAC 1-5-1 (the "Gift Rule") to attend a dinner to be received by an INDOT Employee, Debbie Calder, during the attendance at the 2025 Purdue Road School Transportation Conference and Expo on March 18, 2025 ("Road School").

Commissioner Kenty Abernathy, the appointing authority of the Indiana State Department of Transportation ("INDOT"), has designated authority to me as the agency's ethics officer to waive the application of the Gift Rule in individual cases when consistent with the public interest. I am hereby waiving the application of 42 IAC 1-5-1 (a) in relation to INDOT employee Debbie Calder with regard to her attendance at a dinner being held during Road School on March 18, 2025. The aforementioned INDOT employee's attendance is sponsored by the INDOT vendor, Parsons Transportation Group ("Parsons"). The attendee will benefit from attendance for the reasons provided below.

Parsons is hosting a dinner with several of their customers attending Road School. The dinner will be held at Mountain Jack's Restaurant, 4211 St Rd 26 E, Lafayette, IN 47905. Debbie Calder is not required to pay to attend the dinner but has been invited to attend as a guest of Parsons. This contractor currently does business with INDOT at an approximate cost of one hundred and fifty dollars (\$150.00). No other items of value are being given to this employee, and she has been instructed not to accept any item offered.

INDOT personnel covered by this waiver were instructed not to accept any other item of value from any other person or entity if that person or entity may have a business relationship with INDOT or may seek to influence an action by one or more INDOT personnel in their official capacity. INDOT personnel are regularly informed that the safest course of action at any industry event is to assume that anyone in attendance from the private sector might have a business relationship with INDOT.

Parsons has a current business interest with INDOT. INDOT partners with the Parsons Transportation Group on several projects for various engineering and consulting services. Parsons also offers engineering services to other industries that will also attend Road School.

Road School is primarily an educational and networking event, and it is essential to have leaders in the space to discuss active contracts and projects that Parsons and INDOT are currently doing. It is further an opportunity to allow attendees to have thoughtful discussions on engineering design and current projects and receive additional feedback on project improvements. It also brings together leaders from all of Parsons's customers to get feedback on issues or areas of improvement. As such,

the participation of Debbie Calder, who is INDOT's District Deputy Commissioner for the Crawfordsville District and who is also responsible for all active projects in her district, is hugely beneficial to ensure that INDOT has representation at the dinner, to strengthen relationships with Parsons, connect with industry leaders, and to utilize the opportunity to gain additional knowledge. A waiver of the gift rule to allow Debbie Calder to accept a dinner worth one hundred and fifty dollars (\$150.00) is very much in the public interest under the circumstances set forth above.

Therefore, it is my opinion that it is consistent with the public interest for Debbie Calder to attend the dinner to be hosted by Parsons Transportation Group at Mountain Jack's Restaurant while at attendance at Road School on March 18, 2025, and to receive the item of the value specified above, even though Parsons Transportation Group is making payment for this item. This entity has a business relationship with INDOT. Based on this finding, I am hereby waiving the application of 42 IAC 1-5-1 (a) to allow INDOT employee Debbie Calder to accept the dinner invitation from Parsons Transportation Group pursuant to the details set forth herein.

If you need additional information or have questions about this letter, please contact me at (317) 591-5226 or msteele@indot.in.gov.

Sincerely,

Michele Steele

Michele Steele
Ethics Officer
Indiana Department of Transportation

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