

FILED



ETHICS DISCLOSURE STATEMENT
CONFLICTS OF INTEREST – DECISIONS AND VOTING
State Form 55860 (R / 10-18)
OFFICE OF THE INSPECTOR GENERAL
IC 4-2-6-9

APR 25 2025

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.

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

See attached screening protocol

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

Kurt Graham

Date signed (month, day, year)
04/17/2025

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

Kurt Graham

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

James M. French

Date signed (month, day, year)
4/17/25

Printed full name of ethics officer

James M. French

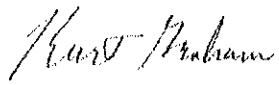
**Protocol to Screen
IDEM Office of Air Quality's Kurt Graham
from Any Matters Regarding Stantec Inc.**

Kurt Graham (Graham) is a section chief in the Indiana Department of Environmental Management's (IDEM) Office of Air Quality's (OAQ) Compliance and Enforcement Branch. Graham's job duties include coordinating the response to open burning incidents in the state, open burning approvals, oversight of inspections of permitted and unpermitted sources for air pollution, as well as the management of his section.

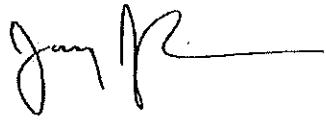
Graham's wife is employed by Stantec Inc. (Stantec), a company regulated by IDEM. Per IC 4-2-6-9, IDEM is implementing the following to ensure that Graham is screened from all matters concerning Stantec.

1. Section Chief Janusz Johnson (BC Johnson) is Graham's direct supervisor. BC Johnson will not assign any current or future matter that may arise involving Stantec, or any of its clients, to Graham.
2. Graham shall recuse himself from the portion of any meeting at IDEM in which discussions specific to Stantec, or in which any of its clients are discussed or are expected to be discussed.
3. Graham shall not discuss any matter involving Stantec, or any of its clients, with any other IDEM employee.
4. BC Johnson will notify in writing all employees in her supervisory chain that they are not to discuss any matters involving Stantec, or any of its clients, with Graham, nor send him any emails concerning Stantec.
5. Graham shall not participate in decisions regarding or relating to Stantec, or any of its clients.
6. Graham shall not access any correspondence or files relating to or involving Stantec, or any of its clients, either during his hours of work at IDEM or by utilizing State equipment. Such documents, if not a matter of public record in IDEM's Virtual File Cabinet, shall be housed with the employee assigned to the matter or kept where Graham does not have access to alter the documents.
7. Graham shall immediately inform BC Johnson and IDEM Ethics Officer James French if any provision of this screening protocol is violated.
8. Graham shall follow IC 4-2-6-9(b) and file a written disclosure statement with the State Ethics Commission.
9. All signatories to this screening protocol shall review it within thirty (30) days from

the date of the last signature to ensure it has been followed and determine if the circumstances have changed to make the protocol no longer necessary.



Kurt Graham
Environmental Manager



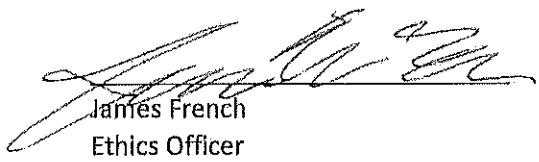
04/17/2025

Date

4/17/2025

Janusz Johnson
Senior Environmental Manager

Date


James French
Ethics Officer

4/17/25

Date



Conflict of Interest Disclosure and Screening Protocol for OAQ's Kurt Graham - Stantec Inc

From French, James M <JFrench@idem.IN.gov>
Date Fri 4/25/2025 11:10 AM
To Woods, Clint (IDEM Commissioner) <ClintWoods@idem.IN.gov>

1 attachment (973 KB)
Graham Disclosure and Screen - Stantec 2025.pdf;

Commissioner Woods,

This email serves as notification to the appointing authority per IC 4-2-6-9(b)(2)(D) that OAQ's Kurt Graham has a potential conflict of interest. Mr. Graham's wife is employed by Stantec Inc., an entity regulated by IDEM. Per IC 4-2-6-9, IDEM is instituting the following to ensure Mr. Graham is screened from any potential conflict of interest with Stantec. Mr. Graham and I have discussed IC 4-2-6-9, and I instructed him to file a written disclosure to the Office of the Inspector General and to implement a screening protocol here at IDEM, see attached. Mr. Graham's supervisor, Janusz Johnson, has been notified of the screening protocol. Please reach out if you have any questions, thanks.

Best,
Michael

James Michael French
Attorney | IDEM
Tel: (317) 234-2170
Email: jfrench@idem.in.gov

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