



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

Mike Braun, Governor
Lyndsay Quist, Commissioner

FILED

July 21, 2026

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

JUL 21 2026

INDIANA STATE
ETHICS COMMISSION

Re: Waiver of Application of 42 IAC 1-5-1 (the "Gift Rule") for Certain Items of Value Received INDOT Executives in Relation to the American Counsel of Engineering Companies Principals & Owners Summer Summit 2026.

Chairwoman Noel:

Commissioner Lyndsay Quist, the appointing authority to the Indiana State Department of Transportation, ("INDOT"), has designated authority to me as the agency's ethics officer to waive application of the Gift Rule in individual cases when consistent with the public interest. I am hereby waiving application of 42 IAC 1-5-1 (a) for items of value that will be received Commissioner Lyndsay Quist & Louis Feagans, Deputy Commissioner of Capital Program Management, at the American Counsel of Engineering Companies (ACEC) Principals & Owners Summer Summit 2026. The Commissioner and Deputy Commissioner will benefit professionally from attendance for the reasons provided below.

The ACEC VIP Principals & Owners Summer Summit will be held on August 18, 2026. The Commissioner and Deputy Commissioner will be able to hear speakers with subject matter expertise and connect with ACEC members, consultants, contractors, and subject matter experts to discuss, learn, and engage with one another through roundtable discussions. The INDOT executives will also have the opportunity to tour the Marian University School of Engineering. The cost of registration for the Summit is Three Hundred Dollars (\$300.00) per person, or a total of six hundred dollars (\$600), drinks and appetizers will also be available.

The registration is being paid for by the ACEC, the Department's largest engineering trade association partner. Most of ACEC's dues paying members gave a business relationship with INDOT. ACEC's mission is "to be the collective voice of the Indiana consulting engineering community." In this role, ACEC works closely with INDOT to bring critical industry perspective to Department policy making, business practices, and project development and implementation. In this way, ACEC is an important partner for INDOT. This partnership brings extensive value to Department operations, as the agency depends on consulting partners to scope, design, and maintain roadway, bridge, and drainage assets. Furthermore, as a public agency operating in the transportation infrastructure industry, INDOT must organize its operations around the realities of designing and building roads in the State of Indiana. Without ACEC's voice in internal and public conversations concerning policy and capital program adoption, the Department would miss out on important insight crucial to the successful execution of the Department's statutory mission to provide the Hoosier taxpayer, and the motoring public at large, with safe, reliable, and high-quality transportation infrastructure.

The INDOT executives covered by this waiver have been 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 might have a business relationship with or operational interest in the Indiana Department of Transportation.

ACEC Principals & Owners Summer Summit 2026 is an opportunity for attendees to learn from and network with experts in the field of transportation engineering. The event brings together clients and designers, along with other industry stakeholders, to learn about high-level strategy, guidance to help leaders past simple tactical efficiencies amid a looming retirement cliff and shifting billing models. The ACEC Principals & Owners Summer Summit in Engineering is an opportunity for the INDOT executives to network and socialize with consultant partners while learning industry advances and leadership tactics.

Indiana Code 8-23-2-4.1(4)(A) provides that INDOT is responsible for the "construction, reconstruction, improvement, maintenance, and repair of (state) highways" and Indiana Code 8-23-2-5(a)(4) imposes upon INDOT the statutory duty to "evaluate and utilize whatever possible improved transportation facility maintenance and construction techniques." By attending the ACEC Principals & Ownership Summer Summit 2026, INDOT's Deputy Commissioner will be educated concerning leadership strategy in the transportation industry. Furthermore, the INDOT Commissioner and Deputy Commissioner will have the opportunity to build better partnerships with attendee firms and trade associations that do business with the Department and educate said industry consultants, who could offer improvements to INDOT's critical design, engineering, and asset management programming.

Therefore, it is my opinion that is consistent with the public interest for Commissioner Lyndsay Quist and Louis Feagans, Deputy Commissioner of Capital Program Management, to attend the Principals & Ownership Summer Summit and to receive the items of value specified above, even though payment for these items was made by ACEC through membership dues and event sponsorships funded in part by INDOT vendors. ACEC is comprised of member companies including current Department vendors and firms with a potential interest in establishing a business relationship with the agency. Based on this finding, I am hereby waiving application of 42 IAC 1-5-1 (a) the INDOT Commissioner and Deputy Commissioner, to accept food and beverages with a total value of approximately three hundred (\$300) provided by ACEC in relation to the executives' attendance at the ACEC VIP Principals & Owners Summer Summit on August 18, 2026.

If you need additional information or have any questions about this letter, please feel free to contact me at (463) 261-6966 or cdevlin@indot.in.gov.

Very Respectfully Submitted,



Chris Devlin
Attorney Senior and Ethics Officer
Indiana Department of Transportation.