



INDIANA DEPARTMENT OF TRANSPORTATION

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Mike Braun, Governor
Lyndsay Quist, Commissioner

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August 14, 2026

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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") for Certain Items of Value Received by INDOT Employees in Relation to the Traffic Control Corporation's (TCC) Expo 2026 scheduled for November 17, 2026, at Medinah Banquets, 550 Shriners Lane, Addison, Illinois 60101.

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 by INDOT Traffic Highway Engineer Supervisor, Prakash Patel; Highway Engineer 2, Shahpor Shahbahrami; Highway Engineer 2, Ankur Desai; Highway Engineer 1, Forum Parikh; and Highway Engineer 2, Nauman Ansari, so that they may accept an Invite to attend the TCC Expo 2026, which will be held on November 17, 2026, at Medinah Banquets in Illinois. Said employees benefited professionally from attendance for the reasons provided below.

TCC Expo 2026 will be held at Medinah Banquets, 550 Shriners Lane, Addison, Illinois 60101. Lunch will be provided to all attendees, but no other benefits will be given to the INDOT employees by TCC, and the event is free for all attendees. The employees estimate lunch costs approximately twelve dollars and fifty cents (\$12.50) per person for a total of approximately sixty-two dollars and fifty cents (\$62.50). The employees believe there will be more than twenty-five (25) attendees.

TCC is a distributor of traffic control safety devices that are used by the INDOT traffic engineering division. The event is being put on, and the lunch is being provided by TCC, which has a business relationship with INDOT.

42 IAC 1-1-1(a) prohibits Department employees from accepting food, drinks, registration fees, and travel expenses from a person with whom INDOT has a business relationship. Because INDOT has a business relationship with TCC, Department employees cannot accept such items of value paid for by TCC without obtaining a waiver under 42 IAC 1-5-1(c).

The TCC Expo 2026 is primarily educational in nature. The five INDOT employees will attend educational sessions about products used by INDOT Traffic Engineering. Their attendance will help the employees keep up with technological specifications and updates of this equipment. The technological knowledge they will gain will be used by employees in performing their duties or designing their in-house projects and/or review of the consultant design projects.

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 his or her 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.

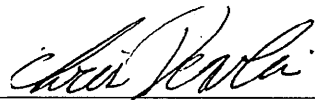
Indiana Code 8-23-2-4.1(4)(A) provides that INDOT is responsible for the "construction, reconstruction, improvement, maintenance, and repair of (state) highways" and Indiana Code 8-23-2-5(a)(4) imposes upon INDOT the statutory duty to "evaluate and utilize whatever possible improved transportation facility maintenance and construction techniques." By attending the TCC Expo 2026, the participating INDOT employees will be educated concerning new technological specifications and updates of the equipment. The information will assist employees in performing their duties as they pertain to traffic control devices.

Therefore, it is my opinion that is consistent with the public interest for the INDOT Traffic Highway Engineer Supervisor, Prakash Patel; Highway Engineer 2, Shahpor Shahbahrami; Highway Engineer 2, Ankur Desai; Highway Engineer 1, Foram Parikh; and Highway Engineer 2, Nauman Ansari, to attend Traffic Control Corporation's Expo 2026 and to receive the items of value specified above, which totals approximately sixty-two dollars and fifty cents (\$62.50), even though payment for these items was made by TCC, an industry distributor with an interest in INDOT business. Based on this finding, I am hereby waving application of 42 IAC 1-5-1 (a) to allow INDOT Traffic Highway Engineer Supervisor, Prakash Patel; Highway Engineer 2, Shahpor Shahbahrami; Highway Engineer 2, Ankur Desai; Highway Engineer 1, Foram Parikh; and Highway Engineer 2, Nauman Ansari, to be held on November 17, 2026.

To prevent any other issues arising under the gift rule, the undersigned ethics officer instructed all employees not to accept any other item of value from an attendee of the TCC event. To ensure the gift rule is not violated, all employees were directed to assume all attendees have a business relationship with INDOT or may attempt to influence official decision making.

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