

**MINUTES OF THE MEETING OF
THE INDIANA STATE ETHICS COMMISSION
February 14, 2019**

I. Call to Order

A regular meeting of the State Ethics Commission (“Commission”) was called to order at 10:01 a.m. Commission members present included Acting Chairperson Corinne Finnerty; Sue Anne Gilroy and Katherine Noel. OIG Staff present included Lori Torres, Inspector General; Jennifer Cooper, Ethics Director; Tiffany Mulligan, Chief Legal Counsel; Heidi Adair, Staff Attorney; Cindy Scruggs, Director of Administration; Jack Bedan, Special Agent and Dale Brewer, Legal Assistant.

Others present were Beth Green, General Counsel and Ethics Officer, DWD; Stephanie Mullany, Deputy Attorney General, OAG; Molly Skarbeck, Administrative Assistant, OAG; Jared Prentice, Ethics Officer, DOR; Mattheus Mitchel, Compliance and Ethics Specialist, DOR; Latosha N. Higgins, Managing Attorney and Ethics Officer, FSSA; Christopher B. Serak, Ethics Officer and Prequalification Director, INDOT; Sarah E. Kamhi, Assistant General Counsel, DOR; Tamera Glickman, Assistant General Counsel, IDOA; Samantha Walton, HIP Operations Manager, FSSA; Sylvia Watson, General Counsel, ISL; Chris Kulik, Staff Attorney, ISDH; Deana Smith, Ethics Officer, ISDH; Erika Steuerwald, ISDH; and Manda Clevenger, Staff Attorney and Privacy Officer, ISDH.

II. Selection of Acting Chair

A motion was made by Commissioner Noel to appoint Commissioner Finnerty as acting chair for the February 14, 2019, Commission meeting. Commissioner Gilroy seconded, and the motion passed. (3-0)

III. Adoption of Agenda and Approval of Minutes

Commissioner Noel moved to adopt the Agenda and Commissioner Gilroy seconded the motion which passed. (3-0) Commissioner Gilroy moved to approve the Minutes of the January 10, 2019 Commission Meeting and Commissioner Noel seconded the motion which passed. (3-0)

IV. Request for Formal Advisory Opinion: Post Employment Restrictions

**2019-FAO-002 Samantha Walton, HIP Operations Manager
 Latosha N. Higgins, Ethics Officer
 Family and Social Services Administration**

Latosha Higgins, Ethics Officer for the Indiana Family and Social Services Administration (FSSA), requested an advisory opinion on behalf of Samantha Walton, Healthy Indiana Plan (HIP) Operations Manager in the Office of Medicaid Policy and Planning (OMPP). Specifically, Ms. Higgins is requesting an opinion from the Commission addressing any conflicts of interests and post-employment restrictions that would apply to Ms. Walton.

Ms. Walton began working for FSSA in 2014 as the Executive Assistant to the Medicaid Director. In 2017, she became the HIP Operations Manager. Her position is responsible for working with the Quality and Outcomes Section in OMPP to establish and measure the quality components of HIP. She is responsible for assisting with the development and implementation of the Medicaid quality strategy plan related to HIP. Her responsibilities include managing operations of the HIP program and working with the OMPP Quality & Outcomes Section to monitor the compliance of the four managed care entities (MCE) that contract with FSSA as their performance directly impacts the operations of the program. Ms. Walton supervises two staff members who are responsible for handling client case concerns and process questions related to the program, MCEs, State, or provider. Each member of her staff is responsible for dealing with customer complaints for their assigned MCEs. Her staff reviews the matters on their own and if they have questions they consult Ms. Walton on the scenario of the case. There is a third staff member who is responsible for the same tasks but solely focuses on Gateway to Work, a component of HIP and for all four MCEs.

Ms. Walton receives information regarding trends in the program by reviewing reports to see what can be done to correct data discrepancies between the eligibility, fiscal, and MCE systems. She provides guidance to the Division of Family Resources, ICES, DXC Technology, and the MCEs on interim solutions to systematic problems that arise. The information and guidance she provides is shared equally with the MCEs. The MCEs all receive the same information. If she identifies an issue with compliance she escalates the matter to contract compliance. Ms. Walton does not provide any recommendations regarding the action that should be taken regarding an MCE's compliance. Nor does she have authority to recommend any course of action.

Ms. Walton is interested in leaving state employment for a position as a Market Service Manager with CareSource. CareSource is one of the MCEs that contracts with FSSA to coordinate care for members enrolled in Indiana Medicaid programs. CareSource is a nonprofit managed care company based in Dayton, Ohio. The company offers Medicaid managed care plans, Medicare Advantage plans and Marketplace insurance plans in multiple states. On November 20, 2018, Ms. Walton notified Ms. Higgins that she applied for and had a first interview for the Market Service Manager position with CareSource.

As the HIP Operations Manager, Ms. Walton regularly interacts with CareSource. The majority of her interactions are with an analyst who reviews member issues with her team or the compliance section when there are questions or clarifications needed related to all MCEs. In 2016, while working as the HIP Compliance Analyst, Ms. Walton participated in scoring the HIP portion of the MCE Request for Proposals (RFP). The RFP was a large scale project, and Ms. Walton was a member of a team working on scoring the RFP. There were four sections for the RFP, Ms. Walton only participated in scoring the HIP section, and her score was only one part of

the overall process. Her score was not binding on the total score of each MCE. Ms. Walton was not part of the team that made the final decision to award a contract to CareSource.

Ms. Higgins provides that Ms. Walton has not engaged in the negotiation or administration of any contract between the State and CareSource nor was she in a position to make a discretionary decision affecting the outcome of the negotiation or administration of any contract with CareSource.

Once OMPP was made aware of Ms. Walton's interest in employment with CareSource, she was removed from working on any issues related their contract operations. A different person was assigned to handle all correspondence with CareSource. In addition, Ms. Walton has not participated in any one-on-one operational meetings with CareSource regarding HIP POWER account reconciliation or Gateway to Work operations. Nor did she participate in any onsite reviews to see if CareSource was ready to operate the new Gateway to Work program. OMPP's Quality & Outcomes section maintains oversight of the MCEs and manages their contracts to ensure compliance. Contract managers under the leadership of the Managed Care Compliance Manger and Quality and Outcomes Section Director are the primary point of contact for the MCEs. CareSource has an assigned contract manager.

Ms. Walton's role as Market Service Manager with CareSource would include consulting with market leaders and the accountable executive to ensure initiatives align with the company's overall business strategy and to develop business cases for new investments.

Ms. Higgins writes that Ms. Walton knows and understands that Indiana's ethics laws will continue to apply to her as a private sector employee. She understands and agrees not to divulge confidential information of FSSA during her post-employment endeavors. Furthermore, Ms. Walton understands and agrees to abide by the one-year restriction regarding registering as an executive branch lobbyist.

FSSA is seeking the Commission's opinion regarding the application of any of the rules in the Code of Ethics to Ms. Walton's post-employment opportunity with CareSource.

The advisory opinion stated the following analysis:

A. Confidential Information

IC 4-2-6-6 prohibits Ms. Walton from accepting any compensation from any employment, transaction, or investment that was entered into or made as a result of material information of a confidential nature. So long as any compensation Ms. Walton receives does not result from confidential information, her potential employment with CareSource would not violate IC 4-2-6-6.

B. Conflict of Interests

IC 4-2-6-9(a)(1) prohibits Ms. Walton from participating in any decision or vote, or matter related to that decision or vote, if she has a financial interest in the outcome of the matter. Similarly, IC 4-2-6-9(a)(4) prohibits her from participating in any decision or vote, or matter related to that decision or vote, in which a person or organization with whom she is negotiating or has an arrangement concerning prospective employment has a financial interest in the outcome of the matter. The definition of financial interest in IC 4-2-6-1(a)(11) includes, “an interest arising from employment or prospective employment for which negotiations have begun.”

In this case, employment negotiations have already begun. Accordingly, Ms. Walton would be prohibited from participating in any decision or vote, or matter related to a decision or vote, in which she, by virtue of her employment negotiations with the vendor, or the vendor itself would have a financial interest in the outcome of the matter.

IC 4-2-6-9(b) requires a state employee who recognizes a potential conflict of interests to notify her agency’s appointing authority and ethics officer and either (1) seek a formal advisory opinion from the Commission; or (2) file a written disclosure form with the OIG.

Ms. Higgins provides that Ms. Walton notified her and the agency of the potential opportunity with CareSource in November of 2018, and FSSA took steps to screen her from matters in which CareSource would have a financial interest in the outcome of any decisions or votes she would make as part of her responsibilities as HIP Operations Manager. Specifically, Ms. Higgins provides that Ms. Walton was removed from working on any issues related to their contract operations. A different person was assigned to handle all correspondence with CareSource. In addition, Ms. Walton has not participated in any one-on-one operational meetings with CareSource since beginning employment negotiations with CareSource. Ms. Higgins then requested this formal advisory opinion on Ms. Walton’s behalf.

To the extent that she continues to not participate in any decisions or votes, or matters relating to any such decisions or votes, in which she or CareSource has a financial interest in the outcome of the matter for the remainder of her state employment, and she ensures that FSSA’s appointing authority has been notified of the identified potential conflict of interests, the Commission finds that Ms. Walton has complied with this rule.

C. Post-Employment

IC 4-2-6-11 consists of two separate limitations: a “cooling off” period and a “particular matter” restriction. The first prohibition, commonly referred to as the cooling off or revolving door period, prevents Ms. Walton from accepting employment from an employer for 365 days from the date that she leaves state employment under various circumstances.

First, Ms. Walton is prohibited from accepting employment as a lobbyist for the entirety of the cooling off period. A lobbyist is defined as an individual who seeks to influence decision making of an agency and who is registered as an executive branch lobbyist under the rules adopted by the Indiana Department of Administration.

Ms. Higgins provides that Ms. Walton understands she is prohibited from engaging in any lobbying activities in her prospective employment with CareSource. To the extent that Ms. Walton does not engage in executive branch lobbying for one year after leaving state employment, her intended employment with CareSource would not violate this provision of the post-employment rule.

Second, Ms. Walton is prohibited from accepting employment for 365 days from the last day of her state employment from an employer with whom 1) she engaged in the negotiation or administration of a contract on behalf of a state agency **and** 2) was in a position to make a discretionary decision affecting the outcome of the negotiation or nature of the administration of the contract.

In 2016, while working as the HIP Compliance Analyst, Ms. Walton did participate in the RFP process for all four of the MCEs as part of a team that scored the HIP portion of the RFP for all four of the MCE contracts. There were four sections of the RFP, Ms. Walton only participated in scoring the HIP section, and her score was only one part of the overall process. The RFP process is part of the contract negotiations that eventually led to CareSource's contract with FSSA.

In Formal Advisory Opinion [17-I-10](#), the Commission found that a former FSSA Contract Compliance Manager who was part of a team who scored portions of the MCE RFP was not subject to the one-year cooling off period. The Commission found that this employee's limited participation (scoring only the HIP portions as part of a team of scorers) in the scoring of the RFP was not enough to constitute a discretionary decision affecting the outcome of the negotiation of the contract.

Consistent with 17-I-10, the Commission finds that Ms. Walton's limited participation in the scoring of this RFP is not enough to constitute a discretionary decision affecting the outcome of the negotiation of a contract. Accordingly, Ms. Walton would not be subject to the cooling off restriction for her role in this RFP process, and she may accept employment with CareSource immediately upon leaving state employment.

The Commission further finds that although some of Ms. Walton's current duties for FSSA appear to come close to or at least relate to the administration of a contract, it does not appear that Ms. Walton had the discretionary authority to affect the nature of CareSource's MCE contract. Although Ms. Walton escalates concerns to other FSSA divisions regarding MCEs not meeting a contract requirement, Ms. Higgins explained that another division at FSSA is responsible for MCE accountability. According to Ms. Higgins, OMPP's Quality & Outcomes section maintains oversight of the MCEs and manages their contracts to ensure compliance. Contract managers under the leadership of the Managed Care Compliance Manager and Quality and Outcomes Section Director

are the primary point of contact for the MCEs. CareSource has an assigned contract manager who makes any discretionary decisions regarding the nature of the administration of their contract.

Accordingly, Ms. Walton would not be subject to the cooling off restriction for her role in the RFP process and other duties related to the CareSource contract, and she may accept employment with CareSource immediately upon leaving state employment.

Third, Ms. Walton is prohibited from accepting employment for 365 days from the last day of her state employment from an employer for whom she made a regulatory or licensing decision that directly applied to the employer or its parent or subsidiary.

Based on the information provided, Ms. Walton has never made a regulatory or licensing decision that directly applied to CareSource during the course of her state employment. Accordingly, the Commission finds that she is not prohibited under this provision from accepting employment with CareSource immediately upon leaving state employment.

Fourth, Ms. Walton is prohibited from accepting employment from an employer if the circumstances surrounding the hire suggest the employer's purpose is to influence her in her official capacity as a state employee. The information presented to the Commission does not suggest that CareSource has extended an offer of employment to Ms. Walton in an attempt to influence her in her capacity as a state employee. Accordingly, the Commission finds that this restriction would not apply to her intended employment opportunity with CareSource.

Finally, Ms. Walton is subject to the post-employment rule's "particular matter" prohibition in her prospective post-employment. This restriction prevents her from representing or assisting a person on any of the following twelve matters if she personally and substantially participated in the matter as a state employee: 1) an application, 2) a business transaction, 3) a claim, 4) a contract, 5) a determination, 6) an enforcement proceeding, 7) an investigation, 8) a judicial proceeding, 9) a lawsuit, 10) a license, 11) an economic development project, or 12) a public works project. The particular matter restriction is not limited to 365 days but instead extends for the entire life of the matter at issue, which may be indefinite.

According to the information provided, Ms. Walton's prospective position as Market Service Manager with CareSource would include consulting with market leaders and the account executives to ensure initiatives align with the company's overall business strategy and to develop business cases for new investments. Ms. Walton will not have any responsibilities regarding CareSource's MCE contract with FSSA nor, to the best of her knowledge, will she have to communicate with FSSA.

The Commission finds that Ms. Walton must ensure compliance with the particular matter restriction and refrain from assisting CareSource or any other person on any of the particular matters listed above in which she may have participated personally and substantially during her state employment.

Subject to the application of the one-year restriction regarding executive branch lobbying, the Commission found that Ms. Walton's post-employment opportunity with CareSource would not violate the post-employment restrictions found in IC 4-2-6-11.

Commissioner Gilroy moved to approve the Commission's finding, and Commissioner Noel seconded the motion which passed. (3-0)

**V. Consideration of the Agreed Settlement
In the Matter of Adam K. Jones/Case Number 2018-07-0183
Tiffany Mulligan, Chief Legal Counsel
Office of Inspector General**

Tiffany Mulligan presented the proposed Agreed Settlement to the Commission for their approval, reminding them that they had approved Probable Cause in this case at their December meeting and if the Commission accepts the Agreed Settlement it will be the final disposition of the proceedings involving Mr. Jones.

Commissioner Noel made a motion to approve the Agreed Settlement. Commissioner Gilroy seconded the motion which passed. (3-0)

VI. Director's Report

State Ethics Director, Jen Cooper, stated that the number of informal advisory opinions issued by the Office of Inspector General since the last meeting was 26. Ms. Cooper reported that the OIG was currently completing the process of the annual filing requirements of the Financial Disclosure Statements. At present, the OIG has received over 1700 filings and indicated that the OIG will have a full report of the number of statements received and any that have failed to report.

VII. Adjournment

Commissioner Gilroy moved to adjourn the public meeting of the State Ethics Commission and Commissioner Noel seconded the motion, which passed (3-0).

The public meeting adjourned at 10:35 a.m.



Eric Holcomb, Governor
State of Indiana

Office of General Counsel
402 W. WASHINGTON STREET, ROOM W451, MS27
INDIANAPOLIS, IN 46204-2744

March 4, 2019

Ethics Commission
Office of the Inspector General
315 West Ohio Street, Room 104
Indianapolis, Indiana 46202
Via Email: info@ig.in.gov

RE: Request for Formal Advisory Opinion for Mary Cline

Dear Chair and members of the Ethics Commission:

The Indiana Family and Social Services Administration (“FSSA”), on behalf of Mary Cline, requests a Formal Advisory Opinion from the State Ethics Commission addressing conflicts of interest under, IC 4-2-6-5.5, IC 4-2-6-10.5 and the criminal conflict of interest statute set forth in IC 35-44.1-4. Ms. Cline and I respectfully request to come before the Ethics Commission at its next meeting on March 14, 2019.

Ms. Cline is an FSSA employee who is also the guardian of an adult child that receives services from FSSA through the Division of Disability and Rehabilitative Services Family Support Waiver. Ms. Cline is interested in pursuing outside employment with Forte Residential, Inc. (Forte), a company that provides in-home support for individuals receiving Medicaid Home and Community Based Services.

Ms. Cline joined FSSA as a contractor in January 2012 and has held various positions as an employee and contractor. Since 2017, she has been employed as a vocational rehabilitation case coordinator for the Vocational Rehabilitation Services (VR) program. VR provides individuals with disabilities a wide range of services and supports needed to help them prepare for, secure, retain, advance in or regain employment. VR partners with vendors across the state, who may be individuals or businesses, to deliver these services.

The VR program is housed within the Bureau of Rehabilitation Services (BRS), which is one of four bureaus housed within the Division of Developmental Disability Services (DDRS). The other three bureaus are the Bureau of Quality Improvement Services (BQIS), Bureau of Developmental Disabilities Services (BDDS), and Bureau of Child Development Services (BCDS). BRS oversees the planning and operation of FSSA’s vocational rehabilitation programs and services. BQIS monitors BDDS providers of Medicaid in-home waivers services and assists other bureaus in



DDRS with quality improvement activities. BQIS also conducts oversight activities for reporting instances of abuse, neglect and exploitation, and ensures compliance with FSSA's state waiver requirements. BDDS provides and coordinates services for individuals with developmental disabilities receiving Medicaid waiver services. BCDS provides early intervention learning services to infants and toddlers with disabilities and their families.

As a VR case coordinator, Ms. Cline is responsible for processing referrals, scheduling appointments, assisting VR counselors in their case management, and paying invoices. The VR counselors that she supports make the decisions regarding when to create, renew or cancel an authorization. Ms. Cline merely performs the administrative function at the direction of the VR counselor. If an individual is referred for VR services, Ms. Cline gathers the demographic information from the individual, assigns a VR counselor and schedules the individual for an intake appointment. The referrals she processes come from a variety of sources, including the individuals themselves, employment agencies, medical providers, case managers, and family members. If it is a referral for a service, the VR counselor makes the decision on the vendor and Ms. Cline creates the authorization per the VR counselor's request.

Decisions regarding which invoices to pay are also made by the VR counselors. If Ms. Cline notices a discrepancy between an authorization and an invoice, she notifies the VR counselor who then makes a decision whether to pay the invoice and provides direction to Ms. Cline. As a VR case coordinator, Ms. Cline is not responsible for the negotiation or administration of any contracts for FSSA. Nor is she responsible for making any licensing or regulatory decisions. Her role is strictly administrative in nature.

On February 12, 2019, I met with Ms. Cline to discuss whether it would be a conflict of interest for her to obtain outside employment with Forte. Prior to inquiring about potential conflicts of interest, Ms. Cline met with a representative of Forte on February 7, 2019. Ms. Cline has not had any further meetings or discussions with Forte since her February 7, 2019 meeting. Ms. Cline has not applied for or interviewed for a position with Forte. Following our meeting, Ms. Cline decided to pursue a formal advisory opinion regarding outside employment with Forte.

Ms. Cline is interested in pursuing part-time employment as direct care staff with Forte so that she can be compensated for providing Participant Assistance Care services to her adult child. As direct care staff for Forte, she would be responsible for providing care, companionship and support to children and adults with developmental disabilities in a variety of home and community settings. She would be paid \$10.00 per hour by Forte for hours worked and compensated for her mileage. Ms. Cline would work evenings and weekends outside of her state work hours.

As a Medicaid waiver provider, Forte's business relationship with FSSA is governed by a BDDS provider agreement and the Indiana Health Coverage Programs (IHCP) Rendering Provider Agreement and Attestation Form. Neither provider agreement is signed by a representative from FSSA. Forte is the only signor on the agreements. Under both provider agreements, Forte agrees to provide services to Medicaid waiver recipients such as Ms. Cline's adult child and to submit claims for reimbursement for services rendered by the company or its employees to FSSA. The

Ethics Commission
RE: Mary Cline
March 4, 2019
Page 3 of 3

services Forte and its employees provide are those that are outlined on a waiver recipient's individualized support plan developed by their support team.


As guardian for her adult child, Ms. Cline is a member of her child's support team, which is responsible for assisting with the development of her child's individualized support plan. Under 460 IAC 6-3-32, the individualized support plan is designed and agreed upon by an individual's support team. The individualized support plan sets forth the paid and unpaid supports and strategies that will be used to help an individual accomplish their long and short term goals. The individualized support plan is designed with a focus on the individual and the individual's vision of what they would like to do in the future. Ms. Cline's child's support team currently consists of her, her child's case manager and recreational therapist. As the guardian, Ms. Cline makes decisions regarding what is added to or removed from her son's individualized support plan. Soon one of Ms. Cline's other children will join her child's support team to provide assistance; however, Ms. Cline will remain the guardian.

In conclusion, Ms. Cline's position with FSSA does not include any involvement with the BDDS waiver program of Forte. The prospective employment with Forte is different from her duties for FSSA and she does not anticipate that working for Forte would require recusal from her official responsibilities to the extent that her ability to perform them would be materially impaired. Furthermore, Ms. Cline has confirmed that she would not be required to use any confidential information in her prospective employment with Forte. Additionally, she understands that she is not to use her FSSA position to secure unwarranted privileges or exemptions that are of substantial value and not properly available to similarly situated individuals outside state government.

Ms. Cline is not in a position to participate in any decisions of votes or other matters related to a decision where Forte would have a financial interest. Ms. Cline knows and understands that if permitted to pursue this outside employment opportunity, the ethics code still applies. She understands and agrees to abide by the ethics code governing conflicts of interest, ghost employment, use of state property and confidential information.

Thank you for your consideration of this request for a formal advisory opinion on the issue of the whether IC 4-2-6-5.5, IC 4-2-6-10.5, or the criminal conflict of interest statute set forth in IC 35-44.1-4 would prohibit Ms. Cline from working for Forte providing care for her adult child while maintaining her employment with FSSA.

Sincerely,


Latosha N. Higgins
Managing Attorney and Ethics Officer

STATE OF INDIANA) INDIANA STATE ETHICS COMMISSION
)SS:
COUNTY OF MARION) CASE: 2018-07-0183

IN RE THE MATTER OF ADAM K. JONES,
Respondent

FINAL REPORT OF THE INDIANA STATE ETHICS COMMISSION

Comes now the Ethics Commission for the State of Indiana (“Commission”), and hereby reports its findings of fact, conclusions of law, and sanctions in the above captioned matter.

FINDINGS OF FACT

1. The Respondent and the Inspector General entered into an Agreed Settlement (“Agreement”) which was accepted by the Commission during their February 14, 2019 meeting.
2. Pursuant to the Agreement, the Respondent, a former employee of the Indiana Board of Animal Health, admitted to multiple violations of the Indiana Code of Ethics; specifically he admitted to a violation of Ind. Code § 4-2-6-5.5, the ethics rule pertaining to outside employment; Ind. Code § 4-2-6-9, the ethics rule pertaining to conflicts of interests as it relates to decisions and votes; Ind. Code § 4-2-6-11(b)(3), the ethics rule pertaining to the cooling off provision of the post-employment rule; and Ind. Code § 4-2-6-17, the ethics rule pertaining to the use of state property.
3. Pursuant to the Agreement, Respondent admitted that he violated Ind. Code § 4-2-6-5.5 by accepting employment with Dairy

Transport Incorporated (DTI), which involved compensation of substantial value, and the responsibilities of that employment were inherently incompatible with the responsibilities of public office or would have required his recusal from matters central or critical to the performance of his official duties at BOAH such that his ability to perform those duties was materially impaired.

4. Pursuant to the Agreement, Respondent admitted that he violated Ind. Code § 4-2-6-9 by participating in a decision or vote, or matter related to that decision or vote, having knowledge that he and/or DTI, a business organization in which he served as an employee, or with whom he had an arrangement concerning prospective employment, had a financial interest in the outcome of the matter.
5. Pursuant to the Agreement, Respondent admitted that he violated Ind. Code § 4-2-6-11(b)(3) by accepting employment or receiving compensation from DTI less than 365 days after leaving state employment after making a regulatory or licensing decision that directly applied to DTI, or to a parent or subsidiary of DTI, during his employment with BOAH.
6. Respondent violated Ind. Code § 4-2-6-17 by using state property for purposes other than official state business, and BOAH's Policy on Limited Personal Use of State Property/Resources did not allow such use.

CONCLUSIONS OF LAW

Said conduct, admitted and acknowledged by Respondent, constitutes a violation of Ind. Code § 4-2-6-5.5; Ind. Code § 4-2-6-9; Ind. Code§ 4-2-6-11(b)(3); and Ind. Code§ 4-2- 6-17.

SANCTIONS

The Commission sanctions the Respondent a fine in the amount of Two Thousand Five Hundred Dollars (\$2500.00) to be paid to the “Indiana State Ethics Commission” within sixty (60) days of from the date the Commission accepted the agreement.

Approved on March 14, 2019.

Corinne Finnerty, Commissioner

Sue Anne Gilroy, Commissioner

Priscilla Keith, Commissioner

Katherine Noel, Commissioner