## FILED



# ETHICS DISCLOSURE STATEMENT CONFLICTS OF INTEREST – DECISIONS AND VOTING

State Form 55860 (R / 10-15)
OFFICE OF THE INSPECTOR GENERAL
IC 4-2-6-9

## AUG 1 2 2024

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.

Name (last) Name (first)			Name (middle)		
Rubin Sarah			···		
Name of office or agency		Job title	u Cumpart Discount & CO Flori	Corridos Designativas	
Department of Transporation		Project Delivery Support Director/I-69 Finish Line Corridor Project Manager			
Address of office (number and street) 100 N. Senate Ave., IGCN 758-CPM		1 ,		ZIP code 46204	
Office telephone number	Office e-mail address (required)				
( 317 ) 775-4396	srubin@indot.in.gov				
Describe the conflict of interest:					
Sarah Rubin is the Project Delivery Support Director/I-69 Finish Line Corridor Project Manager for the Indiana					
Department of Transportation. Sarah Rubin has been interviewing with EGIS and has been offered					
employment by EGIS. EGIS has a business relationship with INDOT, including active contracts					
with the Department. Sarah Rubin's employment negotiations with EGIS therefore created a					
potential decisions and voting conflict of interest under IC 4-2-6-9. This disclosure is therefore being filed in					
anticipation of that potential conflict.					
Sarah Rubin is subject to the mandatory cooling off period (IC 4-2-6-21(b)) with regard to EGIS.					
Sarah Rubin is subject to the particular matter restriction and will not assist future employers, including					
EGIS with any matter she personally and substantially participated in on behalf of INDOT.					
This disclosure was provided to Ms. Rubin's appointing authority, Commissioner Michael J. Smith, on August 7, 2024.					
Evidence of said disclosure to Commissioner Smith is filed herewith pursuant to IC 4-2-6-9(b)(2)(D). Pursuant					
to IC 4-2-6-9(b)(2), this disclosure was executed and filed with the SEC within seven (7) days of the potential					
conflict being identified by the below signed ethics officer.					
A formal screen was executed with INDOT ethics officer preventing Sarah Rubin from working with EGIS					
in her capacity as an INDOT employee. Said screen prohibits Sarah Rubin from exercising any of her official duties					
or otherwise participating in any decision or vote, or matter related to such decision or vote, involving					

Describe the screen established by your ethics officer. (Attach additional pages as needed.) EGIS, or in which EGIS has an interest. Sarah Rubin is further screened from assisting any future employer,				
including EGIS, with any matter in which she personally and substantially participated while	e employed by			
INDOT.				
This screen was executed on August 7, 2024, a copy of which was sent to Commissioner	Michael J. Smith along with			
this disclosure.				
,				
AFFIRMATION				
Your signature below affirms that your disclosures on this form are true, complete, and conknowledge and belief. In addition to this form, you have attached a copy of your written dis	-			
appointing authority and ethics officer.	, ,			
Signature of state officer, employee or special state appointee	Date signed (month, day, year) 8/12/24			
Printed full name of state officer, employee or special state appointee	1 0/12/24			
Sarah Rubin				
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 of cert	Date signed (month, day, year)			
Printed full name of ethics officer  Michele D. Steele	8/12/24			

# CONFLICT OF INTEREST SCREEN FOR SARAH RUBIN August 7, 2024

#### I. RECITALS

WHEREAS, Sarah Rubin is a Project Delivery Support Director/I-69 Finish Line Corridor Project Manager for the Indiana Department of Transportation ("INDOT" or "Department"); and

WHEREAS, Sarah Rubin has been interviewing with for potential employment with EGIS Group ("EGIS"; and

WHEREAS, EGIS has a business relationship with INDOT, including active contracts; and

WHEREAS, as Project Delivery Support Manager/I-69 Finish Line Corridor Project Manager for INDOT, it is possible that Sarah Rubin could be assigned to participate in matters in which EGIS has an interest as part of her regular duties; and

WHEREAS, Sarah Rubin's employment negotiations with EGIS created a potential decision and voting conflict of interest under IC 4-2-6-9 requiring disclosure and a formal screen; and

WHEREAS, Sarah Rubin is subject to the particular matter restriction (IC 4-2-6-11(a)) and cannot assist future employers, including EGIS, with any matter she personally and substantially participated in for INDOT; and

WHEREAS, Sarah Rubin may have obtained confidential information in the course of her employment with INDOT and has an affirmative duty to protect such information from disclosure and to refrain from relying on such information for the benefit of herself or future employers.<sup>1</sup>

NOW THEREFORE, Sarah Rubin, Project Delivery Support Director/I-69 Finish Line Corridor Project Manager for INDOT, for her remaining tenure with INDOT, or until she discontinues employment negotiations with EGIS, agrees to in all ways follow, adhere to, and satisfy the terms of the following Conflict of Interest Screen. Sarah Rubin must adhere to terms three (3) and four (4) regarding the particular matter restriction and confidential information in perpetuity.

#### II. CONFLICT OF INTEREST SCREEN

- 1. Sarah Rubin shall not participate in any decision or vote, or any matter related to such decision or vote, in which EGIS has a financial interest.
- 2. Sarah Rubin is screened from participating in any present or future contract or other matter involving EGIS.
- 3. Sarah Rubin shall not assist any future employers, including EGIS, with any matter she personally and substantially participated in while employed by INDOT. This restriction applies in perpetuity, for the life of the particular matter.
- 4. Pursuant to his duty under Ind. Code §5-14-3-10, Sarah Rubin shall not disclose or otherwise rely upon information classified as confidential under Ind. Code §5-14-3-4. This restriction applies in perpetuity, so long as the subject information is deemed confidential.

#### III. EMPLOYEE AFFIRMATION

I have read and understand the terms of the foregoing Conflict of Interest Screen, and will in all ways follow, adhere to, and satisfy the above stated restrictions on my participation in any decision or vote in which EGIS has a financial interest. I understand that the first two (2) terms of this screen terminate upon my leaving the Department or the discontinuation of negotiations with EGIS, whichever occurs first. I further understand that terms three (3) and four (4) regarding particular matters and confidential information respectively, apply in perpetuity, for the life of each matter and so long as the subject information is deemed confidential. I have shared and discussed this Conflict of Interest Screen and its requirements with my supervisor.

Executed and agreed this 7th day of August 2024, by:

Sarah E. Rubin

Sarah Rubin, Project Delivery Support Director/I-69 Finish Line Corridor Project Manager Indiana Department of Transportation

<sup>&</sup>lt;sup>1</sup> State employees have an affirmative duty under Ind. Code §5-14-3-10 to protect from disclosure and to refrain from relying upon information defined as confidential under Ind. Code §5-14-3-4.

### Baker, Nathaniel P

From:

Steele, Michele

Sent:

Friday, August 9, 2024 12:52 PM

To:

Smith, Michael J

Subject:

Conflicts of Interest Screen - Sarah Rubin

Attachments:

COI Screen- Sarah Rubin Signed.pdf

Commissioner Smith,

This email is to notify you that a conflict-of-interest screen will be filed for Sarah Rubin, an INDOT employee, with the State Ethics Commission.

Thank you,

### Michele Steele, J.D., LLM

Director of Compliance/Prequalification and Ethics Officer Indiana Department of Transportation 100 N. Senate Avenue – Room N758-PQ Indianapolis, IN 46204

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