

INDIANA  
STATE ETHICS COMMISSION

---

315 WEST OHIO STREET, ROOM 104, INDIANAPOLIS, IN 46202 317.232.3850

Minutes of the  
Indiana State Ethics Commission  
May 8, 2025  
At 10:00 am

Indiana State Library  
Indiana Authors Room  
315 West Ohio Street, Second Floor  
Indianapolis, IN 46202

**Commission Members Present:**

Katherine Noel, Chair  
Robert Duncan  
Rafael Sanchez  
Corinne Finnerty

**OIG Members Present:**

Regan Perrodin, State Ethics Commission Director  
Adam Garrigus  
Teresa Henson  
Jared Prentice  
Tiffany Mulligan  
Elaine Vullmahn  
Doreen Clark  
Mark Mitchell  
Will Deane  
JJ Fajt  
Samuel Stearley  
Mike Lepper

**I. Call to Order and Establishment of Quorum**

**10:00 am**

Katherine Noel calls the meeting to order.

**II. Adoption of Agenda**

Commissioner Sanchez made a motion to adopt the agenda. Commissioner Finnerty seconded.

Approved:

### **III. Approval of Minutes from April 10, 2025**

Approval of minutes of April 10, 2025. Commissioner Duncan made a motion to approve the minutes. Commissioner Sanchez seconded.

Approved: 4-0

### **IV. Consideration of Post-Employment Waivers**

- a. Consideration of Post-Employment Waiver for:  
DOL – Kenneth Stepp  
Presented by Ethics Officer Tony Hardman

Kenneth Stepp and Tony Hardman were present and both were sworn in.

The Commissioner of Labor, Mike Speedy, could not be here today and designated Ethics Officer Tony Hardman to present the waiver which waives the cooling-off period related to regulatory and licensing decisions.

Commissioner Sanchez made a motion to approve. Commissioner Duncan seconded.

Approved: 4-0

- b. Consideration of Post-Employment Waiver for:  
INDOT – Sacha Teague  
Presented by Ethics Officer Deborah Law

Sacha Teague and Deborah Law were present and both were sworn in.

INDOT's Commissioner, Linsay Quist, could not be here today and designated Ethics Officer Deborah Law to present the waiver which waives the cooling-off period related to contracts.

Commissioner Duncan made a motion to approve. Commissioner Sanchez seconded.

Approved: 4-0

- a. Consideration of Post-Employment Waiver for:  
INDOT – Taylor Schwering  
Presented by Ethics Officer Deborah Law

Talyor Schwering and Deborah Law were present and both were sworn in.

INDOT's Commissioner, Linsay Quist, could not be here today and designated Ethics Officer Deborah Law to present the waiver which waives the cooling-off period related to contracts.

Commissioner Sanchez made a motion to approve. Commissioner Duncan seconded.

Approved: 4-0

## **V. Consideration of Agreed Settlement**

In the Matter of Rebecca Honn  
Case No. 2024-01-0030

Tiffany Mulligan presented the proposed Agreed Settlement in this matter to the Commission for their approval.

Commissioner Noel made a motion to approve. Commissioner Sanchez seconded.

Approved: 3-1 – Commissioner Finnerty opposed.

## **VI. State Ethics Commission Director's Report**

- a. Update to the Civil Penalties rule: The rule has been approved by the Attorney General's Office and the Governor; The rule will be published on June 4<sup>th</sup>.
- b. An Ethics Officer Roundtable is being planned for May 21<sup>st</sup>. It will be held in the State Library at 12:30 p.m.
- c. The Auditor and Investigator conference is on June 12<sup>th</sup>. It will be in the auditorium of the Southern Government building from 1:00 to 4:30.
- d. 21 IAOs this month, most concerning post-employment and moonlighting.
- e. OIG staff assistance – Regan Perrodin and Adam Garrigus aided in administration for the Commission.

## **VII. Adjournment**

Commissioner Sanchez made a motion to adjourn; Commissioner Finnerty seconded.

Approved: 4-0

The meeting adjourned at approximately 10:40 p.m.

---

June 2, 2025

Katherine Noel, Chair  
Indiana State Ethics Commission  
315 W. Ohio Street, Room 104  
Indianapolis, IN 46204

**IC 4-2-6-11**  
**Post-Employment Waiver: Megan Hibbard**

As the Appointing Authority of the Indiana Department of Workforce Development (DWD), I am filing this waiver of the application of a certain post-employment restriction of the Code of Ethics as it may apply to Megan Hibbard, a High School Equivalency (HSE) Assessment Specialist with DWD, in her desired post-employment with GED Testing Service, LLC (GED).

I understand I must file and present this waiver to the State Ethics Commission at its next meeting on June 12, 2025. I further understand this waiver is not final until approved by the State Ethics Commission.

**A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of:**

IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker.

**B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.**

**1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:**

In her role as a HSE Assessment Specialist with DWD's Adult Education division, Ms. Hibbard assists students in obtaining their HSE information for prospective schools and employers, updates the state's credentials testing programs, monitors existing testing programs, and responds to general HSE program inquiries.

Ms. Hibbard's essential duties include:

- Communicating with local testing center personnel, examinees, and others regarding HSE testing policies and procedures.
- Serving as liaison to Diploma Sender, the credentialing vendor, and Indiana HSE testing sites.
- Responding to mail, emails, and telephone inquiries regarding HSE testing.
- Receiving and approving invoices from a vendor, Propio Language Services (Propio), and overseeing the budget for this project. [This vendor is not Ms. Hibbard's prospective employer.]



- Handling administrative tasks as assigned.

Specifically, Ms. Hibbard serves as the liaison between testing centers and the test vendors. When a test center has specific issues, Ms. Hibbard contacts DWD's direct point of contact at GED or HiSET for guidance. Ms. Hibbard attends GED's and HiSET's monthly calls informing states of updates.

Ms. Hibbard's state duties do not include decision-making authority over policies or rules. Aside from her involvement with Propio described above, Ms. Hibbard's job duties do not include decision-making authority over contracts.

**2. Please describe the nature of the duties to be performed by the employee for the prospective employer:**

Ms. Hibbard's prospective employer is GED, which DWD added to its HSE testing services in 2023. Ms. Hibbard's prospective position is GED's State Relationship Manager (SRM). The SRM team serves as a bridge, facilitating communication and cooperation to enhance the accessibility and administration of the GED test and related resources to educators and program administrators. Each state is assigned a dedicated SRM who acts as the primary point of contact, providing tailored support and guidance to meet the unique needs of each state's educational landscape. The SRM also trains state administrators and adult education program directors.

GED's SRM team strives to increase awareness of the general education diploma test and its importance. SRMs engage in outreach efforts, hosting workshops, webinars, and conferences to educate stakeholders about the benefits of obtaining a general education diploma. These efforts help to demystify the testing process and motivate individuals to take the next step toward their educational and career aspirations. GED's SRM team also focuses on data-driven decision-making. By leveraging data analytics, SRMs can assess the effectiveness of programs and initiatives, making informed adjustments to enhance outcomes. The SRM team plays a crucial role in expanding educational access and support for GED candidates across the nation by building and maintaining strong relationships with state agencies and community organizations to understand and address the challenges faced by individuals pursuing their high school equivalency diploma.

**3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:**

There are only two HSE testing services in the country, and DWD currently contracts with both GED and HiSET. If Ms. Hibbard is selected as GED's candidate of choice, she may be assigned to Indiana as an SRM. In this role, Ms. Hibbard would engage in training with testing providers and DWD employees as new standards and information emerge regarding HSE. Ms. Hibbard would have no contracting authority, nor would she divulge confidential information to GED or use the same. Ms. Hibbard would be involved with the annual Adult Education conference as a GED employee, rather than a DWD employee (as she historically has been).

**4. Please explain whether the prospective employment may be beneficial to the state or the public,**

**specifically stating how the intended employment is consistent with the public interest:**

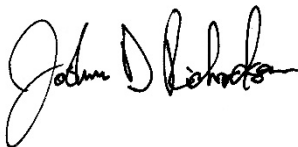
Ms. Hibbard has worked for DWD for four and a half years and has been integral to Indiana's Adult Education program. Ms. Hibbard has developed important skills and strategies and has gained valuable experience during her time in public service. The public will continue to benefit from Ms. Hibbard's Adult Education expertise if she begins employment with GED. It is in the State's interest to allow its employees to continue to advance their careers by accepting employment outside the public sector. Allowing Ms. Hibbard to take a role at a company to which she did not award, sign, or oversee any contracts is consistent with the public interest.

**5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:**

Not providing this waiver could lead to economic hardship for Ms. Hibbard; she may not otherwise be provided with this potential opportunity for employment with GED. There are limited opportunities for advancement of position and salary within DWD's Adult Education division. Allowing Ms. Hibbard to obtain employment with GED as an SRM (including for Indiana, should GED assign her) will enable Ms. Hibbard to further advance her career while continuing to serve the public.

**C. Signatures****1. Appointing authority/state officer of agency**

By signing below, I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.



06/02/2025

Josh Richardson  
Commissioner DWD

Date

**2. Ethics Officer of agency**

By signing below, I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).



06/02/2025

Amie Durfee  
Ethics Officer, DWD

Date

---

**D. Approval by State Ethics Commission****FOR OFFICE USE ONLY**

Approved by State Ethics Commission

---

Katherine Noel, Chair, State Ethics Commission

---

Date

Indiana State Ethics Commission  
c/o Office of Inspector General 315  
W, Ohio Street, Room 104  
Indianapolis, IN 46202

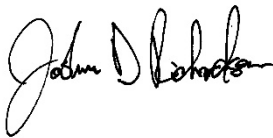
Re: Designation Letter

To Whom It May Concern:

I am the Commissioner of the Indiana Department of Workforce Development, and accordingly, the appointing authority for Megan Hibbard, High School Equivalency (HSE) Assessment Specialist for Indiana Department of Workforce Development, I have submitted a post-employment waiver for Megan Hibbard.

While I will be unable to attend the State Ethics Commission's meeting on June 12, 2025, I hereby designate Amie Durfee, Deputy General Counsel and Ethics Officer for the Indiana Department of Workforce Development, to file and present the above-referenced waiver on my behalf. Therefore, please feel free to direct any questions concerning this filing to Ms. Durfee.

Respectfully,



Josh Richardson, Commissioner  
Indiana Department of Workforce Development





# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

### IC 4-2-6-11

#### Post-employment waiver

As the Appointing Authority of the Indiana Department of Labor (IDOL), I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to IOSHA Director of Health Compliance, Intake, and Whistleblower Protection **Jameson Berry** in his post-employment with **Mainstream Fiber Networks**.

I understand that I must file and present this waiver to the State Ethics Commission at its next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

- A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of  
(Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving):

- ☐ IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.
- ☐ IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.
- ☒ IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.

Note: IOSHA inspected the prospective employer, Mainstream Fiber Networks, for alleged violations of the IOSH Act in response to a complaint in 2021. No citations were issued, but Jameson's name, as director, was used to sign the letter to the company and complainant stating that no violations were found. The compliance officer who performed the inspection was in Jameson's chain of command, but Jameson had no involvement in the inspection or decisions made regarding the inspection, and no contact with the company at that time.

- ☐ IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker. (Please provide a brief description of the specific particular matter(s) to which this waiver applies below):



# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.

1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

In Jameson's current position as an IOSHA director, his name was used to sign many safety orders and letters issued to many companies under circumstances similar to those with Mainstream Fiber Network. He had no contracting authority. He had input into policy and rulemaking decisions, but was not the final authority. Jameson's primary authority was regarding IOSHA compliance inspections and whistleblower investigations, including approval of regulatory decisions regarding employers' violations of certain provisions of the IOSH Act.

2. Please describe the nature of the duties to be performed by the employee for the prospective employer:

Jameson will be Safety and Training Manager for Mainstream Fiber Networks, headquartered in Nashville, IN, but currently serving thirteen Indiana counties. Key duties and responsibilities include the following:

- Develop, implement, and enforce safety policies, procedures, and protocols to maintain a safe work environment in accordance with regulatory requirements and industry best practices.
- Conduct regular safety audits, inspections, and risk assessments to identify potential hazards and implement corrective actions in all company buildings.
- Investigate incidents, accidents, and near misses, analyze root causes, and develop preventive measures to mitigate future occurrences.
- Collaborate with departmental managers to ensure that safety considerations are integrated into all aspects of operations, including equipment maintenance, facility management, and process improvements.
- Administer and manage safety training and awareness programs to employees at all levels, emphasizing the importance of personal accountability and proactive hazard identification.
- Stay abreast of regulatory requirements, industry trends, and emerging technologies related to safety and training, and incorporate relevant updates into organizational policies and practices.
- Prepare reports, presentations, and documentation for internal stakeholders and regulatory agencies as needed, summarizing safety performance, training outcomes, and improvement initiatives.
- Serve as a liaison between management, employees, regulatory agencies, and external training providers, representing the organization's interests and advocating for safety and training priorities.



# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:

As Safety and Training Manager, Jameson would likely be the primary contact or a primary participant with Indiana OSHA if the agency had to inspect the prospective employer. An inspection may never occur and is only likely to occur if there is a health or safety referral or complaint filed against the prospective employer, or if there is a reported injury, illness, or fatality. A potential violation of the IOSH Act by the prospective employer to which Indiana OSHA would respond and open an inspection could be the result of Jameson's work product, but could also be the result of many things from management decisions by the prospective employer to employee misconduct. In any such matters, the agency does not have much discretion, but must follow the applicable laws.

4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest:

Jameson is taking this new job as the next step in his career as a safety and health professional. He has been with the IDOL seven years, serving as a safety consultant with our INSafe division and as an IOSHA director in both construction and general industry. This new opportunity is both an increase in pay and responsibility. Although the IDOL hates to lose talented employees like Jameson, we believe it is in the state's and public interest to allow Hoosier workers to improve themselves and advance their careers, even if it means leaving state employment, as long as ethics rules are followed.

5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

It may limit Jameson's opportunities for advancement greatly if he had to wait for a company that had not been inspected by IOSHA to be in need of a safety manager. This company is also a good fit for Jameson since he has previous experience working with the fiber industry. Due to ongoing cost of living increases and travel expenses, and the fact that Jameson is the only income earner in his household of five due to disabilities with some household members, it is economically infeasible for Jameson to continue to support his family without changing jobs.



# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

### C. Signatures

#### 1. Appointing authority/state officer of agency

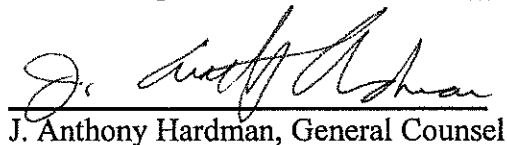
By signing below I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.

  
Mike Speedy, Commissioner

6-2-25  
DATE

#### 2. Ethics Officer of agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).

  
J. Anthony Hardman, General Counsel

6/2/25  
DATE

### D. Approval by State Ethics Commission

#### FOR OFFICE USE ONLY

Approved by State Ethics Commission

\_\_\_\_\_  
Katherine Noel, Chair, State Ethics Commission

\_\_\_\_\_  
Date





# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

---

Mail to:

Office of Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202

OR

Email scanned copy to: [info@ig.in.gov](mailto:info@ig.in.gov)

*Upon receipt you will be contacted with  
details regarding the presentation of this  
waiver to the State Ethics Commission.*



# INDIANA

## DEPARTMENT OF LABOR

**Mike Braun, Governor**

**Mike Speedy, Commissioner**

402 West Washington Street, Room W195

Indianapolis, Indiana 46204-2751

Phone: (317) 232-2655

Fax: (317) 233-3790

June 2, 2025

Indiana State Ethics Commission  
c/o Office of Inspector General  
315 W. Ohio Street, Room 104  
Indianapolis, IN 46202

Re: Designation Letter

To Whom It May Concern:

I am the Commissioner of the Indiana Department of Labor, and accordingly, the appointing authority for Jameson Berry, Director of IOSHA Health Compliance, Intake, and Whistleblower Protection for the Indiana Department of Labor. I have submitted a post-employment waiver for Mr. Berry.

While I will be unable to attend the State Ethics Commission's meeting on June 12, 2025, I hereby designate Tony Hardman, General Counsel and Ethics Officer for the Indiana Department of Labor, to file and present the above-referenced waiver on my behalf. Therefore, please feel free to direct any questions concerning this filing to Mr. Hardman.

Sincerely,

Mike Speedy  
Commissioner

Indiana Department of Labor

**Indiana Code § 4-2-6-11**  
**Post-Employment Waiver**

As the Appointing Authority of the Secretary of Commerce of the Indiana Economic Development Corporation (IEDC), I am filing this waiver of the application of certain post-employment restrictions of the Indiana Code of Ethics as they may apply to Robert Paglia, IEDC's Chief Operating Officer (hereinafter, "Paglia"), in his desired post-employment opportunity with Sondhi Solutions d/b/a Exos IT (hereinafter, "Sondhi").

I understand that I must file and present this waiver to the State Ethics Commission at its next available meeting. I further understand that this waiver is not final until and unless approved by the State Ethics Commission.

**A. This waiver is provided pursuant to IC § 4-2-6-11(g) and specifically waives the application of:**

**IC § 4-2-6-11(b)(2):** 365-day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.

**B. IC § 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC § 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.**

**1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:**

As the Chief Operating Officer at the IEDC, Paglia oversees multiple departments, including but not limited to finance, legal, human resources, and information technology. By statute, the IEDC administers a number of tax credit programs based on job growth and/or capital investment. The determination of whether to award a tax credit is outside the purview of the COO and handled by a different functional group at the IEDC that negotiates the final incentive offers. Upon issuance of a tax credit award to a company (commonly referred to as a "project"), the IEDC and company enter into a long-term tax credit agreement which frequently extends over ten (10) years or more.

The IEDC has a dedicated business unit within its legal group that manages day-to-day matters related to the contracting, reporting, compliance, and general administration of the tax credit agreements. The IEDC's team that handles administration of the tax credit agreements works with the General Counsel/Legal team in the rare instance that a compliance or contract matter cannot be resolved or requires further legal input. As a result, very few matters that involve the

tax credit agreement administration are elevated beyond the legal team, and Paglia's opportunity to participate in discretionary decisions relative to the administration of those tax credit agreements is rare. Accordingly, from October 2023 until January 2025, Paglia's primary interaction with the tax credit agreements was in his role as having delegated signature authority and signing the hundreds of agreements and amendments the IEDC executed.

Sondhi currently has four (4) projects that have active incentive agreements with the IEDC dating back to as early as 2014, of which two (2) were approved prior to Paglia's tenure at the IEDC. The most recent project's incentive agreement has not yet been finalized.

In June of 2024, the account manager responsible for administering Sondhi's tax incentive agreements identified a need to amend the agreements to update the company's project location and make an adjustment to their base employment headcount. Both of those changes are technical administrative adjustments of a nature which occur frequently during the life cycle of these long-term agreements and are at the discretion of the account manager. Paglia did sign the amendments for these adjustments, but they were just a few of the hundreds of tax credit amendments that Paglia signed. These amendments did not involve the negotiations of the agreement, but instead, an update of the company's basic information. Additionally, to the best of his knowledge, Paglia has had no specific matters presented to him regarding the tax credit agreements with Sondhi and therefore, has not made a discretionary decision about the administration of their agreements.

**2. Please describe the nature of the duties to be performed by the employee for the prospective employer:**

In connection with this potential post-employment opportunity with Sondhi, Paglia will serve as the Director of Governments Operations overseeing a team of thirty (30) technical resources providing Tier 1, 2 and 3 services for seventeen (17) different Indiana municipalities, cities and towns. This position will report to the CIO and Managing Director of Sondhi. In his role as Director, Paglia will perform the typical duties for that type of leadership position, including, but not limited to, being primarily responsible for assembling and leading the team working under his direction, managing those people, playing an instrumental role in setting goals and objectives for the Government Operations teams, evaluating, managing and optimizing the overall operations under his purview, and being accountable for the success thereof.

**3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:**

Because his prospective employment has no connection to any of the matters involving Sondhi with which he had any involvement while at IEDC, Paglia's prospective employment is will not involve contact with the IEDC. Furthermore, the prospective employment will primarily be

interfacing with local municipalities, so interaction with IEDC is not necessary. Paglia will have no contact with IEDC through this employment opportunity, on any matter.

- 4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest:**

Paglia has had a long career in Indiana's public sector where his impact has been significant. Prior to serving the IEDC, Paglia served as the Chief Administrative Officer for the Indiana Office of Technology and Technical Manager for the Indiana Public Retirement System. During Paglia's tenure with the IEDC, first as the Chief Administrative Officer and currently as the Chief Operating Officer, the state experienced record job and wage growth, as well as record capital investment. While serving at the IOT, the agency was recognized with dozens of awards for transparency and significant improvements in customer satisfaction, security, and service management. Paglia seeks to utilize his unique skills and expertise to continue to serve Hoosiers through this important position with Sondhi, a trusted full-service IT solutions partner. Paglia is uniquely situated to lead and further develop the synergy between Sondhi, a critical IT partner and Indiana business, and the local government. This is a unique opportunity to improve IT operations for towns, local municipalities and cities across the state by tapping into Paglia's broad experience in technology, security, best practices, and his deep understanding of government operations. It is in the best interest of the State and the public to allow Paglia this opportunity, so he can build on his experience and help the municipalities navigate the tech world.

- 5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:**

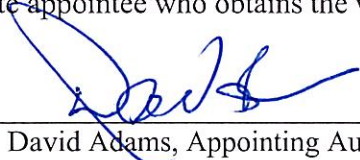
Paglia's extensive public-sector information technology and operations expertise make him uniquely qualified for this opportunity. Should this waiver be denied, it could have implications for Paglia's ability to secure employment with any of the thousands of companies the IEDC has tax incentive agreements within the state. A denial could require him to wait 365 days from his last day of employment with the State and forego a salary and positions with many Indiana employers that would allow him to use his significant background, skills, and experience to continue serving Hoosiers. To provide for his family, Paglia will have little choice but to take a position outside of the state of Indiana in order to continue his work, which would create a significant economic hardship.

We believe the above-referenced reasons weigh in favor of granting a waiver.

### C. Signatures

#### 1. Appointing authority/state officer of agency:

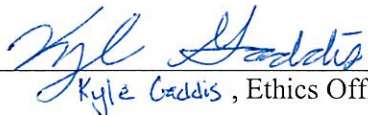
By signing below, I authorize the waiver of the above-specified post-employment restrictions pursuant to IC § 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.

  
\_\_\_\_\_  
David Adams, Appointing Authority

4/5/25  
\_\_\_\_\_  
DATE

#### 2. Ethics Officer of agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC § 4-2-6-11(g)(1)(B).

  
\_\_\_\_\_  
Kyle Gaddis, Ethics Officer

6/5/25  
\_\_\_\_\_  
DATE

### D. Approval by State Ethics Commission

#### FOR OFFICE USE ONLY

Approved by State Ethics Commission

\_\_\_\_\_  
Katherine Noel, Chair, State Ethics Commission

\_\_\_\_\_  
Date

#### Mail to:

Office of Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202

OR

Email scanned copy to: [info@ig.in.gov](mailto:info@ig.in.gov)

*Upon receipt you will be contacted with details regarding the presentation of this waiver to the State Ethics Commission.*



June 10, 2025

Indiana State Ethics Commission  
c/o Office of Inspector General  
315 W. Ohio Street, Room 104  
Indianapolis, IN 46204

Re: Designation Letter; Waiver Request for Robert Paglia

To Whom It May Concern:

As the Secretary of Commerce, I am the appointing authority for the Indiana Economic Development Corporation (IEDC). I have submitted a post-employment waiver for Mr. Paglia.

As I will be unable to attend the Ethics Commission's meeting on June 12, 2025, I hereby designate Becky Yuan, Chief of Staff, Secretary of Commerce, to present the post-employment waiver for Robert Paglia on my behalf.

Sincerely,



David Adams  
Secretary of Commerce



**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

**FILED**

**Reset Form**

**JUN 06 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.

Name ( <i>last</i> ) Paglia	Name ( <i>first</i> ) Robert	Name ( <i>middle</i> )
Name of office or agency Indiana Economic Development Corporation ("IEDC")		Job title Chief Operating Officer
Address of office ( <i>number and street</i> ) 1 N. Capitol Ave. Suite 700		City Indianapolis
		ZIP code 46204
Office telephone number ( 317 ) 232-8800	Office e-mail address ( <i>required</i> ) kgaddis@iedc.in.gov	

Describe the conflict of interest:

Mr. Paglia is currently engaged in negotiations with Sondhi Solutions d/b/a EXOS IT (hereinafter, "Sondhi").

Pursuant to statute, the IEDC operates economic development tax credit programs and enters into tax credit agreements with companies throughout the state that are awarded tax credits under an applicable tax credit program. While the determination of whether to award tax credits to companies is made by a different division at the outside the purview of Mr. Paglia, all tax credit agreements are administered by a division within the IEDC's Legal Department, which reports to Mr. Paglia as COO.

Sondhi currently has active tax credits agreements with the IEDC. Administration matters related to tax credit agreements are primarily handled within the legal department and Mr. Paglia has not participated in any decision or vote or matter relating to the tax credit incentive agreements with Sondhi.

Out of an abundance of caution and in the interest of transparency, Mr. Paglia is filing this disclosure as a potential conflict of interest requiring an ethical screen and disclosure.



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

The potential conflict will be logged in the IEDC's Customer Relationship Database, which is used to identify potential conflicts of interest. Mr. Paglia will be screened from all decisions and votes, including any contracts and/or amendments, as well as any administrative and compliance matters in which Sondhi may have a financial interest. In the event a matter requires escalation from the legal team, it will be handled directly by the IEDC's Executive Director and Mr. Paglia will be completely screened from the matter. Pursuant to IC 5-14-3-10, Mr. Paglia shall not disclose or otherwise rely upon information classified as confidential under IC 5-14-4-3. This restriction applies in perpetuity, so long as the subject information is deemed confidential.

#### 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

Date signed (month, day, year)

6/5/2025

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

Robert Paglia

#### 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

Date signed (month, day, year)

6/5/2025

Printed full name of ethics officer

Kyle Gaddis

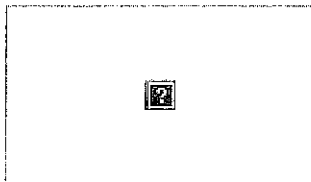
**From:** [Gaddis, Kyle \(IEDC\)](#)  
**To:** [Adams, David](#)  
**Cc:** [Paglia, Robert \(IEDC\)](#); [Blade, Jeff \(IEDC\)](#); [Yuan, Becky](#)  
**Subject:** Notice of COI Disclosure Filing for R. Paglia  
**Date:** Friday, June 6, 2025 11:02:00 AM  
**Attachments:** [Paglia, Robert - IEDC - COI Decision and Voting Disclosure \(Final\).pdf](#)

---

Secretary Adams:

This email is to notify you, as appointing authority, of a conflict of interest disclosure and screen being filed for Robert Paglia related to Sondhi Solutions (d/b/a Exos IT). This disclosure will be filed with the State Ethics Commission shortly.

Thank you,  
Kyle



**Kyle Gaddis**

Vice President & Counsel, Account  
Management & Compliance  
m 317.670.9328 | [forthebold.com](https://forthebold.com)



Learn More...



CONFIDENTIALITY NOTICE: This message and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute, or take action in reliance to this message. If you have received this in error, please notify the sender immediately and promptly delete this message and its attachments from your computer system.



## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

### IC 4-2-6-11

#### Post-employment waiver

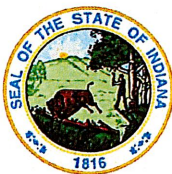
As the Appointing Authority of the Office of the Secretary of Education, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Seth Hinshaw in his post-employment with Indiana State University.

I understand that I must file and present this waiver to the State Ethics Commission at their next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

- A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of  
(Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving):

- ☐ IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.
- ☒ IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.
- ☐ IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.
- ☒ IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker. (Please provide a brief description of the specific particular matter(s) to which this waiver applies below):
- As CFO for the Commission for Higher Education (CHE), Mr. Hinshaw led development of the state's current **higher education performance funding formula** (IC 21-18-16). This formula was used by the legislature to allocate new state funding to Indiana's public institutions during the 2023 legislative session. The formula was voted on by the Commission and discussed heavily at several public meetings. The formula is regularly modified and adjusted to reflect the changing needs of Indiana's higher education landscape. Most recently, the formula was modified to establish more





## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

challenging goals for each of the public institutions in an effort to drive further attainment in the state. In his new role with Indiana State University, Mr. Hinshaw would be expected to maintain a professional relationship with CHE in the continued improvement and implementation of the formula.

- As CFO for CHE, Mr. Hinshaw led the development of the Commission's **biennial budget recommendation for higher education** (IC 21-18-6). These recommendations involved reviewing university budget requests for operating, line items, and capital projects. In his new role with Indiana State University, Mr. Hinshaw would be responsible for supporting the President in developing and presenting the university's biennial budget requests to the Commission, Governor's Office, and General Assembly.
  - As CFO for CHE, Mr. Hinshaw was responsible for reviewing **higher education capital projects** that exceed the Commission's review threshold (i.e., \$500K for a lease and \$2M for construction) (IC 21-33-3-5). In his new role with Indiana State University, Mr. Hinshaw would be expected to lead in the development of new capital projects as well as present them before the Commission and State Budget Committee.
  - As CFO for CHE, Mr. Hinshaw led the development of the 2023 **non-binding tuition and mandatory fee recommendation** for public institutions and supported the same process as CFO for the Office of the Secretary of Education for the 2025 recommendation (IC 21-14-2-12.5). In his new role with Indiana State University, Mr. Hinshaw would be expected to lead the development of future tuition setting for the university.
- B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.
1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

Seth Hinshaw currently serves as Chief Financial Officer (CFO) for the Office of Education under Secretary of Education Katie Jenner. The Office of Education, created by Executive Order 25-07, supports Secretary Jenner in carrying out her responsibilities overseeing the operations of the state agencies within the Office's purview, including the Indiana Commission for Higher Education (CHE). As CFO, Mr. Hinshaw coordinates the Office's financial policies, oversees the financial personnel of the agencies within the Office's purview, coordinates with the Office of Management and Budget (OMB), and serves as a member of the Secretary's executive leadership team.

Prior to beginning that role in January 2025, Mr. Hinshaw served as CFO for CHE from 2022 to 2025. By statute, CHE's role is to plan and coordinate, but not manage or regulate, Indiana's system of state institutions—including reviewing operating and capital budget appropriation requests and degree programs, administer state financial aid programs and funds available for





## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

postsecondary education from the federal government, and make recommendations concerning postsecondary education, along with performing other functions as assigned by the Governor or General Assembly. In that role, Mr. Hinshaw oversaw the following departments: finance, business intelligence (data), and enterprise solutions (IT).

Mr. Hinshaw's duties and responsibilities have involved and continue to require substantial decision-making authority over various higher education policies and grant agreements. Though, in his current role, Mr. Hinshaw has no signatory authority for any agency, he was the primary contract and grant signatory in his prior role with CHE, signing all contracts and grant agreements on CHE's behalf, including contracts with private and state educational institutions such as Indiana State University.

Additionally, in the 2023 and 2025 budget cycles, Mr. Hinshaw was responsible for drafting CHE's biennial budget recommendations for consideration and vote by CHE's governing board, as required by IC 21-18-6. The budget recommendations included a variety of funding components, including capital project review, outcomes-based performance funding, line items, and state financial aid.

Mr. Hinshaw's prior role as CFO for CHE included contract and grant signatory responsibilities. During his tenure with CHE, Mr. Hinshaw signed two grant agreements with Indiana State on behalf of CHE, including amendments. These agreements supported the two-year College Success program, and Transition to Teaching program. The former (grant # 79158) was a competitive grant awarded to more than twenty public and private institutions of higher education. Indiana State's award totaled \$320,000 to support several success coaches, whose purpose was to provide support for low-income students in an effort to drive retention and degree completion. The latter (grant # 89541) provides tuition assistance to professionals with existing degrees to teach K-12 education through an abbreviated program of pedagogy; this program is provided by many public and private institutions throughout the state, each of whom receive varying levels of funding from the state.

Mr. Hinshaw's interactions with Indiana State University have been consistent with his interactions with all state and private universities in Indiana. Both his current and immediate past roles required him to regularly engage with both finance and government affairs professionals from all seven public institutions of higher education. All decision-making responsibilities were tied to formal Commission actions at public meetings.

1. Please describe the nature of the duties to be performed by the employee for the prospective employer:

Mr. Hinshaw's prospective employer is Indiana State University, and his title would be Vice President for Finance and Administration. In this position, Mr. Hinshaw would develop revenue and cost strategies to create operational efficiencies and maximize resources to support the University; provide effective stewardship of ISU's resources; and build a strong team with the ability to collaborate across the institution and provide services and support to the University community, including the business functions of





## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

accounting, budgeting, investing, procurement, facility operations, capital planning and construction, payroll, audit, and human resources.

1. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:

Mr. Hinshaw's role with Indiana State University would involve interaction with CHE, and to a lesser extent, the Office of the Secretary of Education. CHE is a coordinating body whose statutory responsibilities includes "plan[ing] for and coordinat[ing] Indiana's state supported system of postsecondary education." Mr. Hinshaw's leadership role with the prospective employer would necessitate some level of planning, coordinating, and interaction with CHE staff and commission members. This interaction would likely focus on financial aid policies, performance funding, capital planning and review (which would include presentations both to CHE and separately to the State Budget Committee), biennial budget development, legislative reports, and other matters where the chief financial officer of a state university would be expected to engage with the state government. Though he would serve as signatory on contracts between Indiana State University and the state, he would not be involved in negotiating contracts and the like with CHE, as those details are generally coordinated by program staff at both the university and agency.

Mr. Hinshaw's ability to impact discretionary decisions made by the agency based on his work product with the prospective employer will be minimal. The Commission, as a coordinating board, indirectly impacts university operations through policy advocacy, coordination, and sharing of best practices. Because the Commission is not a regulatory body, Mr. Hinshaw's potential influence will have limited impact on any discretionary decisions made by the Commission. Mr. Hinshaw's prospective role has responsibility over capital management and planning, which will require the state's review of capital projects exceeding certain thresholds; however, those projects must also be reviewed by the State Budget Committee, State Budget Agency, and Governor, thus limiting the discretionary nature of the single agency decision.

2. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest:

Mr. Hinshaw's prospective employment is beneficial to both the state and the public. As previously mentioned, CHE's purpose is to coordinate post-secondary education across the state of Indiana. Effective coordination includes strong relationships between key university leaders, shared knowledge of key state strategies and goals, and clear understanding of state funding streams and priorities.

Mr. Hinshaw's experience in state government in these key roles will ensure the state's vision and priorities will continue to be shared with one of its state educational institutions, a key partner in the state's workforce strategy, and will strengthen Indiana State University's financial operations



## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

as the university's new administration establishes its strategic priorities. Not only will Indiana State University and its students be well served, but the state and Hoosier taxpayers will benefit from the efforts to improve the university's fiscal health and maximize state-provided resources.

Conversely, denying a waiver in these circumstances and preventing Mr. Hinshaw from employment with a state university could serve to dissuade others from working for CHE in such a senior role in the future.

2. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

Denying this waiver request would provide an economic hardship for Mr. Hinshaw as he would not have the opportunity to further his career in a meaningful way outside of state government or leaving Indiana for opportunities with out-of-state educational institutions. As his interactions with Indiana State University have been the same as at all other state and private institutions in Indiana, barring this opportunity would effectively bar him from all finance-related positions with Indiana's educational institutions, severely limiting Mr. Hinshaw's professional prospects and growth.

### C. Signatures

1. Appointing authority/state officer of agency

By signing below I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.

Dr. Katie Jenner, as Appointing Authority  
Secretary of Education

June 4, 2025

DATE

2. Ethics Officer of Agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).

Dr. Matthew Butler  
Indiana Commission for Higher Education

06/04/25

Date





## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

### FOR OFFICE USE ONLY

Approved by State Ethics Commission

\_\_\_\_\_  
Katherine Noel, Chair, State Ethics Commission

\_\_\_\_\_  
Date

Mail to:

Office of Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202

OR

Email scanned copy to:

[info@ig.in.gov](mailto:info@ig.in.gov)

*Upon receipt you will be contacted  
with details regarding the*





## Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

June 4, 2025

Indiana State Ethics Commission  
c/o Office of Inspector General  
315 W. Ohio Street, Room 104  
Indianapolis, Indiana 46202

Re: Designation Letter

Dear Commissioners:

I serve as Secretary of Education and am the appointing authority for the staff of the Office of Education, including my Chief Financial Officer, Seth Hinshaw. I have submitted a post-employment waiver for Mr. Hinshaw for your consideration.

While I will be unable to attend the State Ethics Commission's meeting on June 12, 2025, I hereby designate Josh Garrison, Chief of Staff for the Office of Education, to present the above-referenced waiver on my behalf. Please feel free to direct any questions concerning the filing to Mr. Garrison.

Thank you for your consideration of this waiver request.

Sincerely,

Katie Jenner  
Secretary of Education



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

Name ( <i>last</i> ) Hinshaw	Name ( <i>first</i> ) Seth	Name ( <i>middle</i> ) Ethan Thomas
Name of office or agency Office of the Secretary of Education		Job title Chief Financial Officer
Address of office ( <i>number and street</i> ) 200 W Washington St.		<div>City Indianapolis</div> <div>ZIP code 46204</div>
Office telephone number ( 317 ) 232-1025	Office e-mail address ( <i>required</i> ) shinshaw@che.in.gov	

Seth Hinshaw is the Chief Financial Officer for the Office of the Secretary of Education, which oversees several stage agencies including the Indiana Commission for Higher Education (Commission) and the Department of Education (Department). Seth Hinshaw is currently involved in employment discussions with Indiana State University, one of Indiana's seven public state educational institutions (SEI) of higher education. Both the Commission and the Department have active contracts with Indiana State, including two grant agreements and related amendments, signed by Seth in 2023 and 2024 while in his former role of Chief Financial Officer for the Commission.

Seth Hinshaw was also chiefly responsible for developing the state's updated performance funding formula for public SEI in 2022, developing the Commission's 2023 and 2025 budget recommendation for higher education, and played a key role in the Commission's non-binding tuition and mandatory fee recommendation in both 2023 and 2025.

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

Seth Hinshaw will be screened completely from any discussion or involvement regarding state grants and contracts between Indiana State University and any agency within the Education Vertical of state government. Seth no longer serves as agency signatory for any state agency and will therefore not sign any new contracts or amendments.

Seth Hinshaw will not participate in any meetings or discussions regarding Indiana State, and the Office of the Secretary of Education Chief of Staff, Josh Garrison, will designate another individual to handle such matters, who for these purposes will report directly to the Chief of Staff on any matters involving Indiana State.

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 <i>Seth Hinshaw</i>	Date signed (month, day, year) 05-30-2025
Printed full name of state officer, employee or special state appointee Seth Hinshaw	

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 <i>Matthew Butler</i>	Date signed (month, day, year) 5/30/2025
Printed full name of ethics officer Matthew Butler	

**Garrigus, Adam**

---

**From:** Hinshaw, Seth (CHE)  
**Sent:** Friday, May 30, 2025 12:00 PM  
**To:** Jenner, Katie; Lowery, Chris (CHE)  
**Cc:** Butler, Matt (CHE); Garrison, Joshua (CHE); Nossett, James (Michael)  
**Subject:** Conflict of Interest Notice  
**Attachments:** 55860\_COI\_Hinshaw\_Seth\_5-30-25.pdf

**Importance:** High

Secretary Jenner and Commissioner Lowery,

This email serves to notify you that a conflict-of-interest disclosure statement (attached) will be filed for me with the State Ethics Commission.

Effective immediately, I will cease any direct involvement in meetings or discussion regarding Indiana State University. This includes topics such as outcomes-based performance funding, capital project review, and any other fiscal policy that may directly or indirectly impact Indiana State. I will also communicate with the full membership of your cabinets and my direct reports to ensure maximum transparency and accountability.

Thank you.

**Seth Hinshaw**  
Chief Financial Officer  
Office of the Secretary of Education  
(317) 232-1025  
[shinshaw@che.in.gov](mailto:shinshaw@che.in.gov)

STATE OF INDIANA            )       INDIANA STATE ETHICS COMMISSION  
  ) SS:  
COUNTY OF MARION        )                               CASE NO.: 2024-01-0030

IN RE THE MATTER OF REBECCA HONN  
RESPONDENT

FINAL REPORT OF THE INDIANA STATE ETHICS COMMISSION

The Indiana State Ethics Commission hereby reports its findings of fact, conclusions of law, and sanctions in the above captioned matter.

FINDINGS OF FACT

1. Rebecca Honn, Respondent, with assistance from counsel Erik Weber, and the Inspector General entered into an Agreed Settlement which the Commission accepted during their May 8, 2025, meeting.
2. Pursuant to the Agreed Settlement, Respondent admitted to three violations of the Indiana Code of Ethics; specifically, she admitted to a violation of Ind. Code § 4-2-6-11(b)(3), the post-employment rule’s cooling-off provision; 42 IAC 1-5-10, the Benefitting from Confidential Information rule; and 42 IAC 1-5-11, the Divulging Confidential Information rule.
3. Pursuant to the Agreed Settlement, Respondent admitted that she violated Ind. Code § 4-2-6-11(b)(3) by accepting employment with Allen County Youth Service Center (YSC) on November 21, 2023, before the expiration of the 365-day waiting period. YSC is an entity for which she conducted regulatory and licensing visits as a Residential Licensing Specialist.
4. Pursuant to the Agreed Settlement, Respondent admitted that she violated 42 IAC 1-5-10 by emailing the date of an unannounced visit to Pierceton

Woods Academy (PWA) and permitting PWA to benefit from the information by allowing PWA to prepare for the visit eleven days before it occurred.

5. Pursuant to the Agreed Settlement, Respondent admitted that she violated 42 IAC 1-5-11 by divulging information of a confidential nature, specifically the date of the unannounced visit, which Respondent emailed to PWA.

#### CONCLUSIONS OF LAW

Said conduct, admitted and acknowledged by Respondent, constitutes violations of Ind. Code § 4-2-6-11(b)(3), 42 IAC 1-5-10, and 42 IAC 1-5-11.

#### SANCTIONS

1. The Commission imposes a fine to be paid by Respondent in the amount of \$1,500.00 to the “Indiana State Ethics Commission” within 60 days from May 8, 2025, the date that the Commission approved the Agreement.

Approved on May 8, 2025.

---

Katherine J. Noel, Chair

---

Corinne R. Finnerty, Commissioner

---

Sue Anne Gilroy, Commissioner

---

Rafael Sanchez, Commissioner

---

Robert Duncan, Commissioner

STATE OF INDIANA                    )  
  ) SS: INDIANA STATE ETHICS COMMISSION  
COUNTY OF MARION                ) CASE NO: 2024-03-0090

IN RE KURT BENSHEIMER,  
    *Respondent.*

FILED  
JUN 02 2025  
INDIAN,  
ETHICS COMMISSION

**JOINT MOTION TO VACATE PUBLIC HEARING**  
**AND CONSIDER SETTLEMENT AGREEMENT**

Petitioner, the Inspector General, by and through Will Deane, Staff Attorney, and Respondent, Kurt Bensheimer, respectfully request that the State Ethics Commission issue an order vacating the hearing set in this matter on July 10, 2025. The parties have reached a settlement agreement in this matter and request to submit the agreement to the Commission at its meeting on June 12, 2025, in lieu of the public hearing.

Respectfully submitted,



\_\_\_\_\_  
Will Deane, Staff Attorney  
Attorney No. 38831-49  
Office of the Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202  
(317) 234-8603  
[jdeane@ig.in.gov](mailto:jdeane@ig.in.gov)



\_\_\_\_\_  
Kurt Bensheimer  
10620 North Meridian Road  
Fortville, Indiana 46040  
(317) 766-1466  
[Kbensheimer@idoc.in.gov](mailto:Kbensheimer@idoc.in.gov)


STATE OF INDIANA            )     INDIANA STATE ETHICS COMMISSION  
                                      ) SS:  
COUNTY OF MARION        )     CASE NO: 2024-03-0090


IN THE MATTER OF KURT BENSHEIMER,  
*Respondent.*

**AGREED SETTLEMENT**

1. Respondent admits to the facts as alleged in the complaint filed herein by the Inspector General and admits to a violation of 42 IAC 1-5-1, the Indiana Code of Ethics' Gift rule. (See Ethics Complaint filed on the 12th day of May 2025, attached hereto as Exhibit A.)
2. Respondent agrees to pay a fine in the amount of one thousand eight hundred sixty-seven dollars and seven cents (\$1,867.07). The State Ethics Commission (Commission) will not impose any further penalties under Ind. Code § 4-2-6-12. Respondent shall make one payment to the "Indiana State Ethics Commission" in the full amount of one thousand eight hundred sixty-seven dollars and seven cents (\$1,867.07) within sixty (60) days from the date that the Commission accepts this agreement.
3. The parties acknowledge that this agreement reflects the entire agreement between the parties, that approval of these terms by the Commission shall result in the final disposition of this proceeding, and that Respondent is waiving an alternative statutory right to a public hearing as provided in Ind. Code § 4-2-6-4 to contest the complaint.

Dated this 22 of June, 2025.

  
Kurt Bensheimer, Respondent

  
Jared Prentice, Inspector General

  
Will Deane, Staff Attorney  
Indiana Office of Inspector General



Approved this \_\_\_\_\_ day of \_\_\_\_\_, 2025, by the State Ethics Commission in a public meeting by a vote of \_\_\_\_\_ to \_\_\_\_\_.

---

State Ethics Commission Chair