



INDIANA DEPARTMENT OF TRANSPORTATION

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Mike Braun, Governor
Lyndsay Quist, Commissioner

FILED

January 29,2026

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

JAN 29 2026

INDIANA STATE
ETHICS COMMISSION

Re: Waiver of Application of 42 IAC 1-5-1 (the "Gift Rule") for Certain Items of Value Received INDOT Employee in Relation to the 2026 Asphalt Recycling and Reclamation Association Annual Meeting, (ARRA), which will be held from February 17 thru February 20, 2026, in Austin, Texas..

Chairwoman Noel:

Commissioner Lyndsay Quist, the appointing authority to the Indiana State Department of Transportation, ("INDOT"), has designated authority to me as the agency's ethics officer to waive application of the Gift Rule in individual cases when consistent with the public interest. I am hereby waiving application of 42 IAC 1-5-1 (a) for items of value that will be received by INDOT Project Supervisor, Stephanie Turner, at the Annual ARRA Meeting, which be held on February 17-20, 2026. Said employee will benefit professionally from attendance for the reasons provided below.

The 50th Annual ARRA Meeting will be held at the Hilton Austin at 500 East Fourth Street, Austin, Texas 78701. Ms. Turner will be accepting the 2026 ARRA/Roads & Bridges Award on behalf INDOT. During the course of the meeting, Ms. Turner will have the opportunity to collaborate with industry leaders and experts from across the world. There will also be opportunities for networking, drive innovation, and exchange cutting edge best practices. Hands-on technical and education sessions designed to deepen industry knowledge and foster professional growth will be held during the meeting. ARRA is providing Ms. Turner with complementary registration worth Five Hundred Dollars (\$500). Breakfast will be provided to all attendees during the awards ceremony, but ARRA will not be providing any additional benefits to Stephanie Turner.

The complementary registration is being provided by ARRA an organization whose members include asphalt contractors, suppliers, engineering consultants, and service providers. Through its committees and staff, ARRA works in close partnership with INDOT and with many of Indiana's cities, towns, and counties. ARRA members include INDOT vendors and suppliers with ongoing business relationships with the Department. ARRA itself is an industry partner of the Department with an interest in the business and operation decision-making of the agency. Corporate trinkets potentially made available to attending INDOT employees may potentially be offered by existing Department vendors or companies with an interest in future agency contracting opportunities. While such souvenirs are not subject to the prohibition on accepting gifts under 42 IAC 1-5-1, receipt is being disclosed in the interest of complete transparency.

INDOT personnel covered by this waiver were instructed not to accept any other item of value from any other person or entity if that person or entity may have a business relationship with INDOT or may seek to influence an action by one or more INDOT personnel in his or her official capacity. INDOT personnel are regularly

informed that the safest course of action at any industry event is to assume that anyone in attendance might have a business relationship with or operational interest in the Indiana Department of Transportation.

The ARRA Meeting is primarily educational in nature, and INDOT employee, Stephanie Turner, will be attending, as well as participating in marketing, engineering and transportation forums. Ms. Turner will be able to take advantage of the unique opportunity to engage diverse industry stakeholders and experts on topics of particular interest to her duties at the Department.

Stephanie Turner is employed in the Highway Engineering Division at the Greenfield District at INDOT and therefore administers INDOT's adherence to the industry best practices in the field of asphalt paving, construction, and design. As a Project Manager, Ms. Turner works closely with pavement industry stakeholders, such as ARRA which is the preeminent socio-educational platform for advancing asphalt recycling and reclamation, construction, and design. The professional services provided by this INDOT employee on behalf of the State of the Indiana are greatly enhanced through learning about evolving best practices and technological developments in asphalt construction, design, paving, engineering, and maintenance, and from exchanging ideas with commercial stakeholders at events such as product presentations, which promises to allow attendees to "engage in meaningful networking, drive innovation, and exchange cutting-edge best practices. Most importantly, they will participate in association-specific, hands-on technical and educational sessions designed to deepen industry knowledge and foster professional growth." Accordingly, Stephanie Turner holds a position with duties that will directly benefit from her attendance at the event, both through the educational and networking components.

Indiana Code 8-23-2-4.1(4)(A) provides that INDOT is responsible for the "construction, reconstruction, improvement, maintenance, and repair of (state) highways" and Indiana Code 8-23-2-5(a)(4) imposes upon INDOT the statutory duty to "evaluate and utilize whatever possible improved transportation facility maintenance and construction techniques." By attending the 50th Annual ARRA Meeting, Stephanie Turner will be educated concerning production, advanced production, and quality while engaging with industry stakeholders to ensure that they are provided with information vital to their decision-making process.

Therefore, it is my opinion that is consistent with the public interest for the INDOT Project Manager, Stephanie Turner, to attend the Asphalt Recycling and Reclamation Association 50th Annual Meeting, and to receive the items of value specified above, even though payment for these items was made by ARRA, an industry association with an interest in INDOT business, comprised of member companies including current Department vendors and firms with a potential interest in establishing a business relationship with the agency. Based on this finding, I am hereby waiving application of 42 IAC 1-5-1 (a) to allow all INDOT Project Manager, Stephanie Turner, to accept the complementary registration to attend the ARRA 50th Annual Meeting, for which the registration fee amount for Ms. Turner is Five Hundred Dollars (\$500).

To prevent any other issues arising under the gift rule, the undersigned ethics officer instructed the employee not to accept any other item of value from an attendee of the ARRA 50th Annual Meeting. To ensure the gift rule is not violated, the employee was directed to assume all attendees have a business relationship with INDOT or may attempt to influence official decision making.

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

Very Respectfully Submitted,



Chris Devlin
Attorney Senior and Ethics Officer

Indiana Department of Transportation.