



**ETHICS DISCLOSURE STATEMENT  
CONFLICTS OF INTEREST – DECISIONS AND VOTING**  
State Form 55860 (6-15)  
OFFICE OF THE INSPECTOR GENERAL  
IC 4-2-6-9

INDIANA  
STATE ETHICS COMMISSION  
OCT 13 2015  
FILED

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.

Last name Korty	First name Tina	Middle initial L
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Address of office (*number and street, city, state, and ZIP code*)  
311 W Washington St, Ste 103, Indianapolis, IN 46204

Title or position within agency General Counsel	Name of agency Indiana Department of Insurance
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Describe the conflict of interest:  
I was contacted by Senior Health Insurance Company of Pennsylvania (SHIP), a company regulated by the IDOI, regarding an upcoming opening for a general counsel at SHIP. I have not decided if I'm going to pursue the opportunity; however, I was dealing with a consumer matter involving SHIP and feel that an ethical screen is necessary to avoid the appearance of impropriety.

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

IDOI's ethics officer, Meggan Brumbaugh, notified all IDOI Chiefs, all my direct reports, and a few other key personnel of the screen. A printout of the email is attached. In addition, she notified SHIP of the screen. A printout of that email is also attached. Basically, I have been screen<sup>ed</sup> from involvement in any matter involving SHIP or Fuzion Analytics, a third party administrator affiliate of SHIP. These screens were put in place within 24 hours of my receipt of the email giving rise to the potential conflict.

#### 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)

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

#### 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)

Printed full name of ethics officer

**Korty, Tina**

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**From:** Korty, Tina  
**Sent:** Wednesday, October 07, 2015 10:47 AM  
**To:** Robertson, Stephen W.  
**Cc:** Brumbaugh, Meggan  
**Subject:** FW: wow, this will seem inappropriate but it is not.  
**Attachments:** General Counsel May 2015 (2) (3).docx

Commissioner,

We spoke about this earlier this morning, but I am also required by the ethics rules to formally notify you in writing of this reach-out from Senior Health Insurance Company of Pennsylvania, an entity regulated by the IDOI, which creates a potential conflict of interest. Meggan and I are in the process of erecting an appropriate ethical screen. If I decide to speak with Pat, I will keep you informed.

Tina

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**From:** Carmody, Pat [<mailto:pcarmody@fuzionanalytics.com>]  
**Sent:** Tuesday, October 06, 2015 5:31 PM  
**To:** Korty, Tina  
**Subject:** wow, this will seem inappropriate but it is not.

I am retiring in February 2016 and we are recruiting for someone to replace me as General Counsel.

I talked to Steve Robertson a few months ago. I was asking him if he knew of anyone who would make a good replacement for me.

He got back to me in a couple days and said it would be OK if I talked to you and he said some very nice things about you.

So here I am several months later hoping I did not already have this conversation with you. I have been a little stressed as I wind down my career and I lose track of a few things here and there.

Anyway, here is the job description. If you are interested or would like to discuss, just let me know.

Sorry to bring this up right in the middle of a consumer complaint but that issue is all but settled.

Thanks for listening.

PLC

Patrick L. Carmody  
Senior Vice President and  
General Counsel  
Senior Health Insurance Company of Pennsylvania  
O 317 566 7567  
C 402 880 5628



 Please consider the environment before printing this e-mail.

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## Korty, Tina

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**From:** Brumbaugh, Meggan  
**Sent:** Wednesday, October 07, 2015 3:07 PM  
**To:** Robertson, Stephen W.; Webber, Doug; Donovan, Cindy; Foy, Bettye; Lohman, Barbara; St. Clair, Cheryl; McNeil, Debra; Kixmiller, Kate; Knable, Karl J; Hockwalt, Greta; Beard, Amy (IDOI); Collier, Brigitte (DOI); Peck, Alex  
**Cc:** Korty, Tina  
**Subject:** Ethical screen

All:

I am writing as IDOI's Ethics Officer to make you aware of an ethical screen that has recently been established. Tina Korty has been contacted by a representative of Senior Health Insurance Company of Pennsylvania ("Senior Health") regarding a position. Senior Health is an insurance company regulated by the IDOI. Therefore, to allow Tina to pursue this potential employment opportunity if she so chooses, she must be screened completely from any contact with Senior Health and Fuzion Analytics, Inc. (a third party administrator affiliate). Please refrain from discussing matters involving Senior Health or Fuzion Analytics, Inc. with Tina. Going forward, any matters involving these companies which require legal advice should be addressed to Amy Beard.

This ethical screen is required to be established by IC 4-2-6-9, and will remain in place until I notify you otherwise. If you have any questions, please contact me.

Meggan J. R. Brumbaugh  
Indiana Department of Insurance  
Legal Services  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787  
317.232.0143  
317.232.5251 (fax)

## **Brumbaugh, Meggan**

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**From:** Brumbaugh, Meggan  
**Sent:** Wednesday, October 07, 2015 3:18 PM  
**To:** 'pcarmody@fuzionanalytics.com'  
**Subject:** Ethical screen

Dear Mr. Carmody:

I am writing as IDOI's Ethics Officer to make you aware of an ethical screen that has recently been established. I understand that IDOI's General Counsel, Tina Korty, may be interested in beginning potential employment discussions with Senior Health Insurance Company of Pennsylvania ("Senior Health"). Therefore, aside from potential employment discussions, Tina must be screened completely from any contact with Senior Health during the pendency of these discussions. Outside of potential employment discussions, Tina and representatives of Senior Health should have no contact with each other. This includes all forms of communication, including by telephone, email, or in-person. In addition, outside of potential employment discussions, Tina and representatives from Fuzion Analytics, Inc. should have no contact with each other.

Please respond to this email to confirm that you have received it, and that you understand and agree on behalf of Senior Health and Fuzion Analytics, Inc. to abide by the terms of the ethical screen. If you have any questions, please direct them to me. Thank you for your anticipated cooperation.

Sincerely,

Meggan Brumbaugh  
Indiana Department of Insurance  
Legal Services  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787  
317.232.0143  
317.232.5251 (fax)