



**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

INDIANA  
STATE ETHICS COMMISSION

SEP 25 2019

**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.

Name (last) Marcuccilli	Name (first) Kristin	Name (middle) M.
Name of office or agency STAR Financial Bank		Job title Exec. Vice President & Chief Operating Officer
Address of office (number and street) 6320 Bluffton Road		City Fort Wayne
		ZIP code 46809
Office telephone number ( 260 ) 479-4622	Office e-mail address (required) Kristin.Marcuccilli@starfinancial.com	

Describe the conflict of interest:  
On September 17, 2019, the Indiana Economic Development Corporation ("IEDC") Board of Directors considered an application from The Lofts at Headwaters Park, LLC for the approval of a Community Revitalization Enhancement District (CRED) tax credits to help finance its proposed mixed-use development project (the "Project") in Fort Wayne, Indiana. In addition to the CRED tax credits, Lofts at Headwaters Park indicated in its application that it would also be utilizing conventional bank financing which STAR Financial Bank ("STAR") has offered to participate in. Prior to the meeting, Ms. Marcuccilli notified the IEDC's Ethics Officer that she is the Executive Vice President & Chief Operating Officer for STAR. Ms. Marcuccilli, by virtue of her senior leadership position with STAR, has a potential financial interest (as defined in Indiana Code section 4-2-6-1(a)(11)), in the Lofts at Headwaters Park application for CRED tax credits. In the interest of transparency and out of an abundance of caution, the IEDC Ethics Officer identified this as a financial interest requiring an ethical screen and disclosure.

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

As detailed in the Ethics Commission's Advisory Opinion 17-I-2, the IEDC has well-established ethical screening procedures. Ms. Marcuccilli's senior leadership position with STAR was logged into the IEDC's Customer Relationship Management (CRM) database, which is used to identify potential conflicts of interest. Ms. Marcuccilli was screened from any involvement in the Lofts at Headwaters Park matter. Ms. Marcuccilli has not and will not discuss the Lofts at Headwaters Park matter with the IEDC staff or members of the IEDC Board of Directors, other than to disclose her senior leadership position with STAR to the IEDC's Ethics Officer. When the IEDC Board of Directors conducted its public meeting on September 17, 2019, Ms. Marcuccilli recused herself from any discussion, decision, or vote related to the Lofts at Headwaters Park matter and was completely screened from the matter.

**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)

9/25/19

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

Kristin M. Marcuccilli

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)

9/25/19

Printed full name of ethics officer

Kyle D. Gaddis

**Baker, Nathaniel P**

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**From:** Gaddis, Kyle (IEDC)  
**Sent:** Wednesday, September 25, 2019 12:21 PM  
**To:** Schellinger, Jim  
**Cc:** Cotterill, Chris W  
**Subject:** Notification of Potential Conflict for IEDC Board Member  
**Attachments:** Marcuccilli, K - 4-2-6-9 Disclosure (Lofts at Headwaters Park)-Final.pdf

Sec. Schellinger,

Pursuant to 42 IAC 1-5-6 and Indiana Code section 4-2-6-9, attached is the ethics disclosure statement for Kristin Marcuccilli regarding the Lofts at Headwaters Park matter. I have filed today with the Inspector General's Office. Please let me know if you have any questions or concerns.

Respectfully,  
Kyle

**Kyle Gaddis**  
Deputy General Counsel

Indiana Economic Development Corporation  
1 North Capitol Avenue, Suite 700  
Indianapolis, IN 46204  
317.232.8893  
317.670.9328

