



ANNUAL
REPORT
2024-2025



INDIANA
SUPREME
COURT



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Photography

Daryl Black, Jr., Jon Broadwell, Chris Bucher, Kathryn Dolan,
Michael Herrick, Vincent Morretino, and other friends of the
Court.

On the cover

The five Supreme Court justices at Indiana Wesleyan University.

FROM YOUR

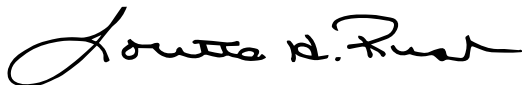
Indiana Supreme Court

On behalf of my colleagues, I am honored to present the 2024-2025 Supreme Court annual report. This report showcases the work during the past fiscal year of our Court, our administrative staff, and our partners in justice from all co-equal branches of government.

This year, we:

- established a strategic data modernization program to develop a comprehensive data warehouse and create policies for data sharing
- adopted new Guardian ad Litem Guidelines for Civil Family Law Cases and published a registry of certified GALs
- provided 1,142 hours of education to judges, court staff, and other justice stakeholders on a variety of topics both virtually and in person at locations around the state
- continued development of a statewide jail management system that will provide policymakers with accurate jail data as they confront overcrowding issues
- disposed of 692 cases and handed down 50 majority opinions

I am honored to serve as Indiana's chief justice. It is a pleasure to work hand in hand with judges across the state and my colleagues in the appellate courts. As I stated in my annual address to the governor and legislature in January, your judiciary is truly blessed to enjoy such a collaborative and collegial relationship with the executive and legislative branches of this great state.

A handwritten signature in black ink, reading "Loretta H. Rush". The signature is fluid and cursive, with the first name "Loretta" being more prominent and the last name "Rush" following in a similar style.

Loretta H. Rush
Chief Justice of Indiana



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Justices



Loretta Rush

Chief Justice

Appointed

2012 by Gov. Mitchell E. Daniels, Jr.
2014, 2019, and 2024 as Chief Justice

Education

Purdue University
Indiana University Maurer School of Law



Mark Massa

Justice

Appointed

2012 by Gov. Mitchell E. Daniels, Jr.

Education

Indiana University
Indiana University McKinney School of Law



Geoffrey Slaughter

Justice

Appointed

2016 by Gov. Michael R. Pence

Education

Indiana University
Indiana University Kelley School of Business
Indiana University Maurer School of Law



Christopher Goff

Justice

Appointed

2017 by Gov. Eric J. Holcomb

Education

Ball State University
Indiana University Maurer School of Law
Duke University



Derek Molter

Justice

Appointed

2022 by Gov. Eric J. Holcomb

Education

Indiana University
Indiana University Maurer School of Law





Cases

Most cases in Indiana are decided by trial courts. Less than 1% of the cases in the state are appealed to the Supreme Court.



704
Cases
Received



692
Cases
Disposed



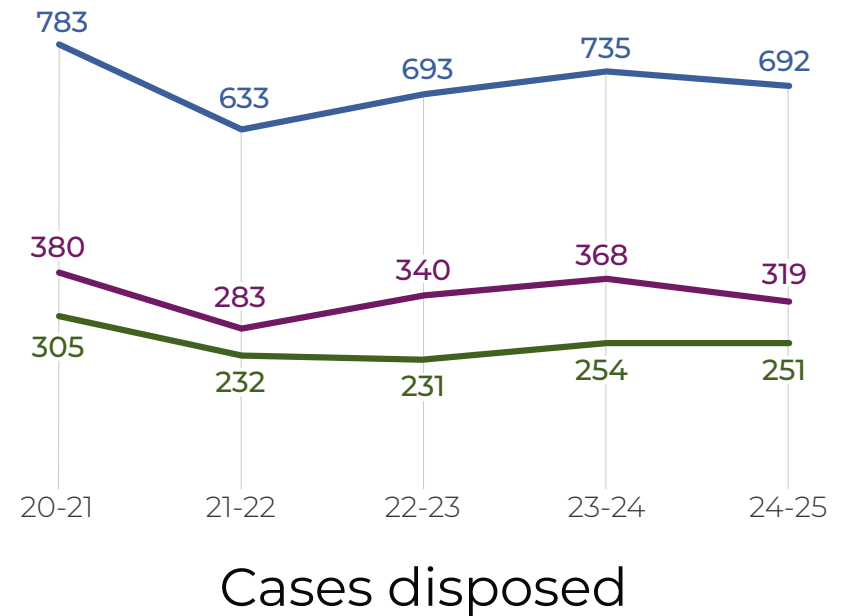
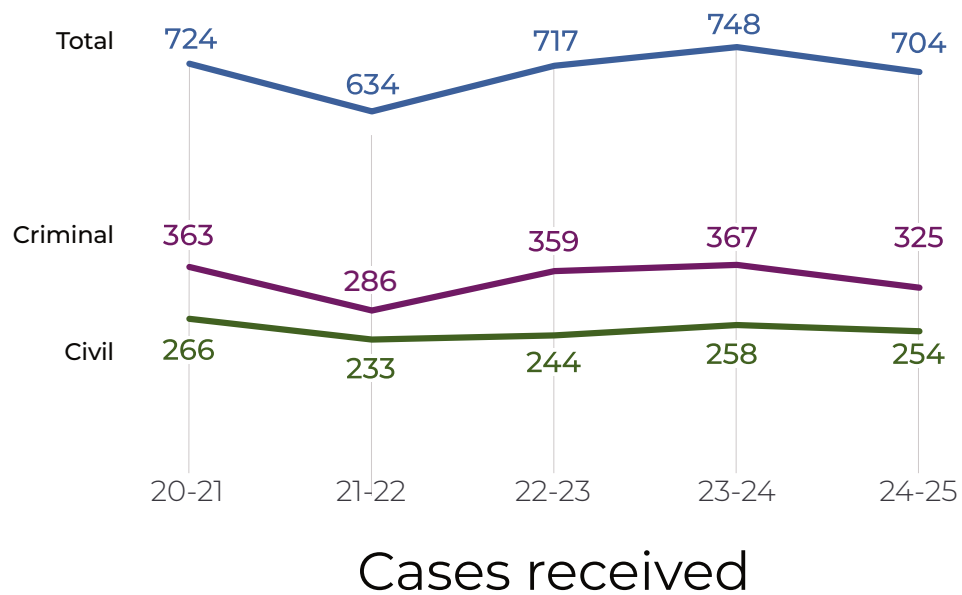
41
Transfers
Granted



48
Oral
Arguments

Trends

Total cases received and disposed by the Court across a five-year period, also comparing the criminal and civil cases included in the totals.



CASES

Inventory

An accounting of the number of cases pending at the beginning and end of the fiscal year by case type.

	Pending 7/1/24	Received 7/1/24 – 6/30/25	Disposed 7/1/24– 6/30/25	Pending 6/30/25
Criminal	42	325	319	48
Civil	58	254	251	61
Tax	-	8	5	3
Original Actions	1	45	42	4
Board of Law Examiners	-	-	-	-
Mandate of Funds	-	1	-	1
Attorney Discipline	36	64	69	31
Judicial Discipline	-	4	2	2
Certified Questions	1	3	4	-
Total	138	704	692	150

CASES

Received

All cases received by the Supreme Court during the fiscal year, organized by case type.

Criminal 325

Petitions for rehearing	2
Direct appeals – other	1
Post-conviction appeals – capital	3
Post-conviction appeals – non-capital	36
All other criminal	283

Discipline 68

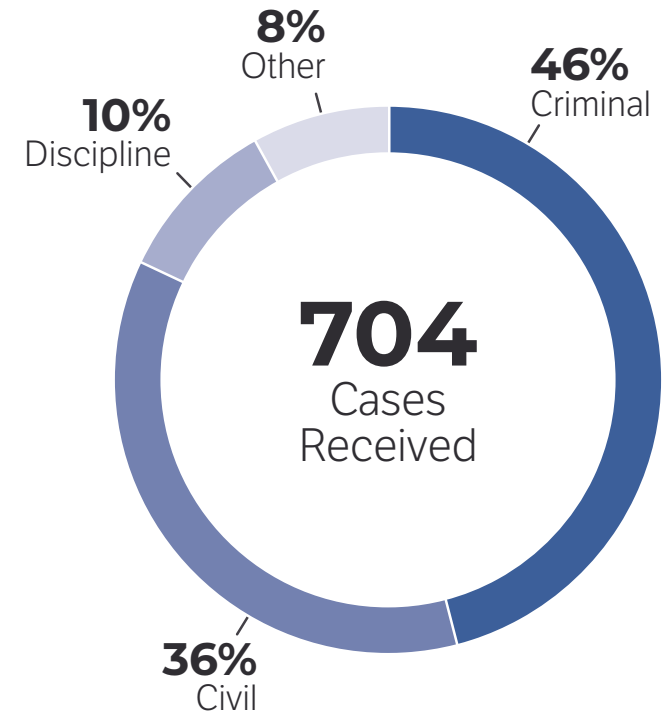
Attorney discipline matters	64
Formal judicial discipline charges	4

Civil 254

Petitions for rehearing	3
Direct appeals	1
All other civil	250

Other Types 57

Original actions	45
Tax Court petitions for review	8
Certified questions	3
Mandate of funds	1



CASES

Disposed

All cases disposed by the Supreme Court during the fiscal year, organized by case type.

Criminal 319

Petitions to transfer denied, dismissed, or appeal remanded by order	305
Opinions on petitions to transfer	6
Opinions on direct appeals	3
Orders on direct appeals	2
Orders on rehearing	1
Petitions to transfer granted and remanded by order	1
Other opinions and dispositions	1

Discipline 71

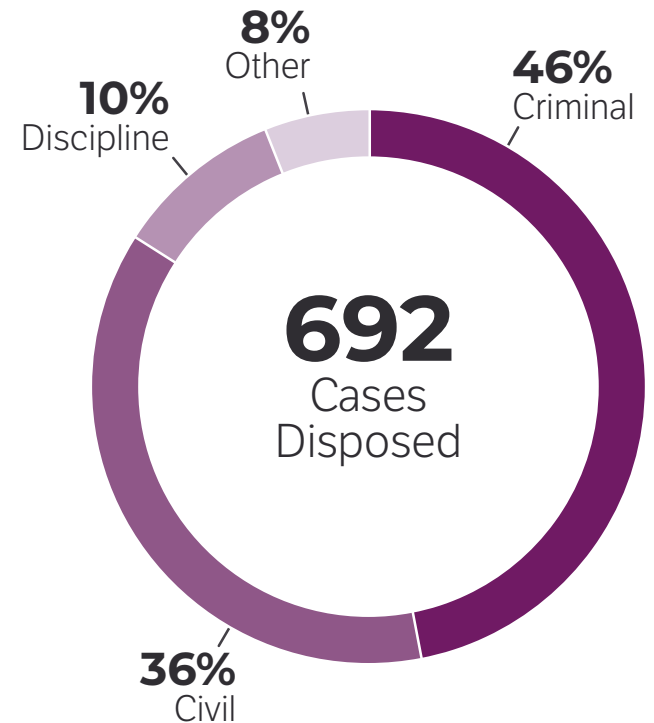
Opinions and published orders in attorney discipline cases	31
Other dispositions in attorney discipline cases	38
Opinions and published orders in judicial discipline cases	2

Civil 251

Petitions to transfer denied, dismissed, or appeal remanded by order	208
Opinions on petitions to transfer	35
Orders on rehearing	3
Petitions to transfer granted and remanded by order	3
Other opinions and dispositions	2

Other Types 51

Original actions disposed without opinion	41
Dispositive orders on Tax Court petitions for review	5
Opinions and orders on certified questions	4
Opinions in original actions	1



Attorney Discipline

Details on the types of attorney discipline matters received and the result of each matter disposed.

Received	64	Disposed	69		
Petitions to show cause for noncooperation	21	Dismissal of show cause proceeding due to other suspension	13	Public reprimand	2
Verified complaints for disciplinary action	20	Dismissal on compliance with show cause order	10	Suspension with automatic reinstatement*	2
Petitions for reinstatement	7	Converting noncooperation suspension to indefinite suspension	7	Suspension without automatic reinstatement*	2
Notices of findings of guilt (felony) and requests for interim suspension	6	Suspension with conditions/probation*	7	Denying reinstatement	2
Petitions to terminate probation	6	Terminating probation	6	Miscellaneous dismissing or withdrawing action	2
Petitions to revoke probation	1	Accepting resignation	4	Miscellaneous	2
Affidavits of resignation	1	Interim suspension on finding of guilt (felony)	4	Disbarment	1
Petitions for emergency interim suspension	1	Withdrawal or dismissal of petition for reinstatement	3	Emergency interim suspension granted	1
Motions for release from reciprocal suspension	1			Granting reinstatement	1

*after verified complaint

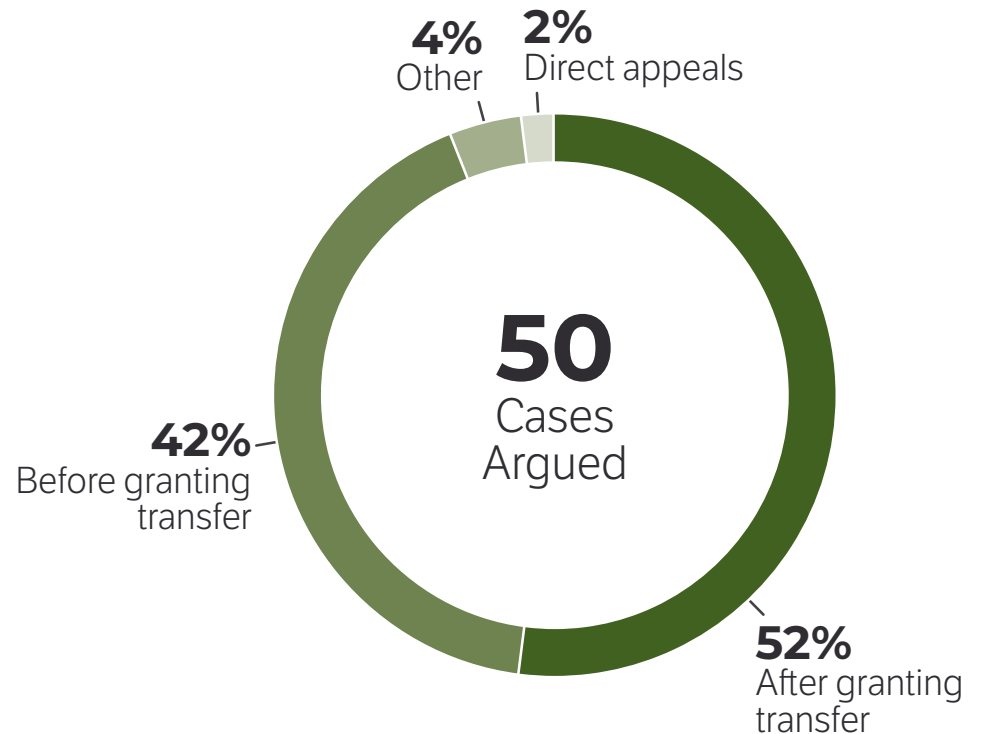
Oral Arguments

The Supreme Court heard 48 oral arguments in 50 cases during the fiscal year.

46 arguments were held in the courtroom at the Statehouse. One argument took place at South Newton High School in Newton County, and another was held at Indiana Wesleyan University in Grant County. All arguments were streamed live, recorded, and can be viewed online.

The following details the types of cases presented at oral argument:

All Cases Argued	50
Criminal (before decision on transfer)	6
Criminal (after transfer granted)	5
Criminal (direct appeals)	1
Civil/Tax (before decision on transfer/review)	15
Civil/Tax (after transfer/review granted)	21
Other case types	2



ORAL ARGUMENTS On the Road

As part of its continued commitment to public access, the Supreme Court makes two trips a year to hear oral argument in locations across the state. By moving these events from its courtroom to other venues, the Court gives students, local dignitaries, media, and the general public the opportunity to see the state's highest appellate court in action without having to travel to downtown Indianapolis.

The Court traveled to Newton County in fall 2024, in what was a homecoming for its newest member. Justice Derek Molter graduated from South Newton High School before earning both his B.A. and J.D. at Indiana University. His former high school gymnasium played host to around 750 people eager to watch the Court



hear argument in *Kiera Isgrig v. Trustees of Indiana University*. In this appeal, the justices were asked to decide the applicability of the evidence rule *res ipsa loquitur* (“the thing speaks for itself”) after a university student was injured by a falling window.

In April 2025, the Court was welcomed by Indiana Wesleyan University in Grant County. Nearly 1,000 guests gathered in IWU’s Chapel Auditorium as the justices heard argument in two appeals that considered the extent of a landowner’s duty to ensure the safety of someone who intends to come onto his property for business purposes while that person is still outside his property: *Kaur and*

Estate of Dhillon v. Amazon and *Oukbu v. Amazon*. This time, it was Justice Goff who had a special connection to the location, which he shared in personal anecdotes about growing up in nearby Wabash.

In both Newton and Grant counties, the arguments were capped off by insightful questions from students in their respective audiences. In addition to asking the justices about their career paths and what a typical day on the Court feels like, students took the opportunity to seek advice on pursuing legal careers, maintaining work-life balance, and developing the traits of outstanding law school applicants.



Opinions

Justices published 90 opinions during the fiscal year.



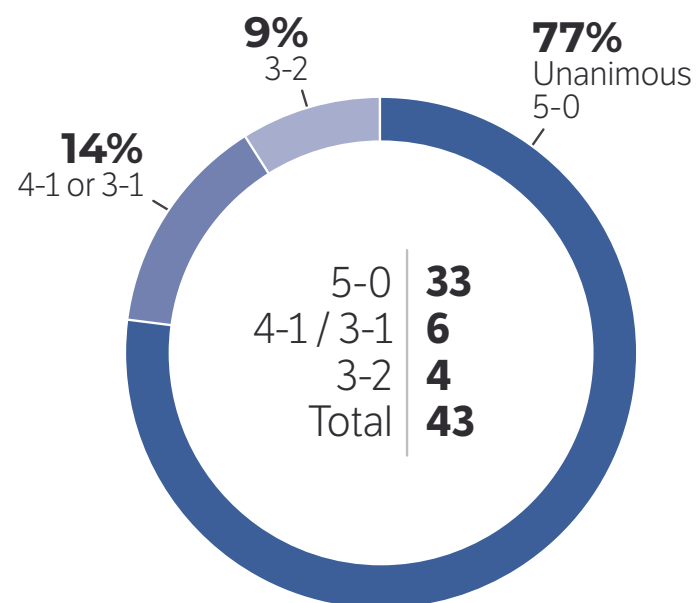
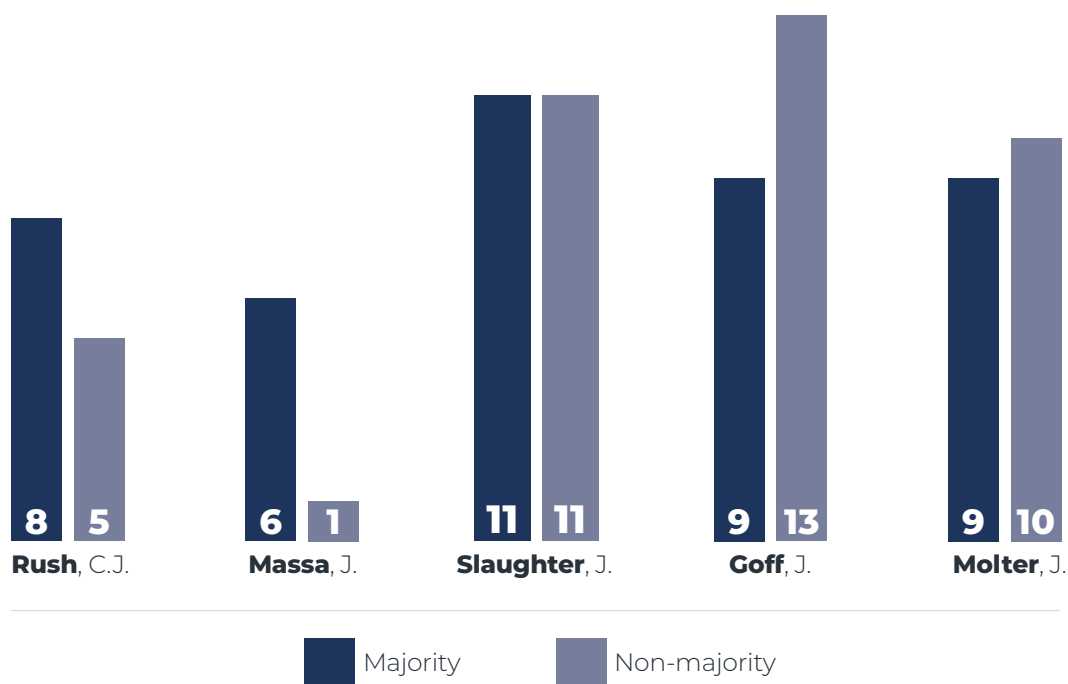
90
Total
opinions



50
Majority
opinions



40
Non-majority
opinions



Opinions by author

In addition to 7 *per curiam* opinions handed down by the Court, the justices wrote 43 majority and 40 non-majority opinions.

Consensus of opinions

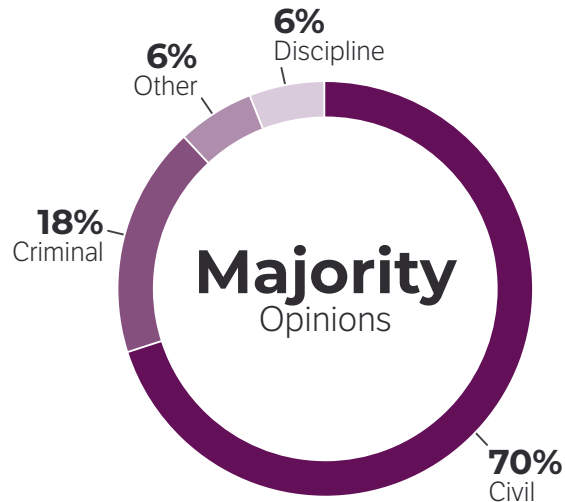
The Court is mostly unanimous in its decisions. There can be some split decisions and rare “other” cases in which fewer than three justices are in complete agreement as to result. There were no “other” cases during the fiscal year. The chart excludes 7 *per curiam* opinions.



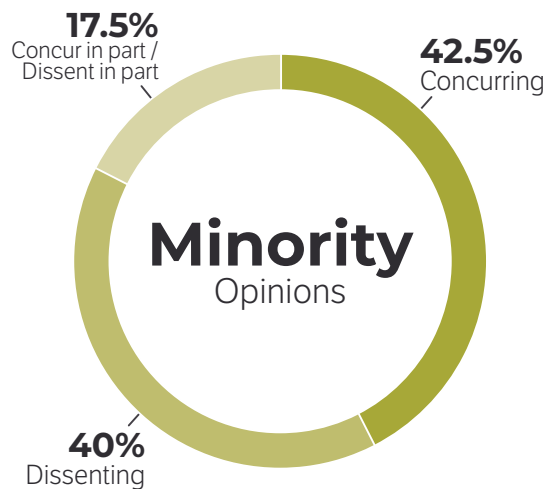
OPINIONS

Majority opinions in detail

A breakdown of the majority opinions authored by each justice for each case type heard by the Supreme Court.



	Rush, C.J.	Massa, J.	Slaughter, J.	Goff, J.	Molter, J.	By the Court	Total
Criminal transfer	-	1	-	2	3	-	6
Criminal direct appeal	-	1	1	-	1	-	3
Civil transfer	8	3	9	7	5	3	35
Civil direct appeal	-	-	-	-	-	-	0
Certified questions	-	1	1	-	-	-	2
Original action	-	-	-	-	-	1	1
Discipline	-	-	-	-	-	3	3
Other	-	-	-	-	-	-	0
Total	8	6	11	9	9	7	50



Non-majority opinions in detail

Non-majority opinions are not dispositive.

	Rush, C.J.	Massa, J.	Slaughter, J.	Goff, J.	Molter, J.	Total
Concurring	2	-	6	2	7	17
Dissenting	3	-	3	7	3	16
Concur in part / Dissent in part	-	1	2	4	-	7
Total	5	1	11	13	10	40

Year in Review

FISCAL YEAR: JULY 1, 2024 TO JUNE 30, 2025



July 1 The Judicial Qualifications Commission issued advisory opinion #1-24 regarding “Campaign Endorsements and Other Campaign Conduct.” At issue is the definition of “permissible campaign conduct” as governed by Canon 4 of the Code of Judicial Conduct, answering such questions as, “May a judicial candidate use public areas of the courthouse to take photos for campaign materials?”

July 2 Former Chief Justice Randall T. Shepard made a generous donation of 85 books from his office to the Supreme Court Law Library. They included a book on the history of English common law dating back to 1716 and a copy of *American Boyhood* by the 26th justice of the Indiana Supreme Court, Horace P. Biddle.

Pictured at left. Former Chief Justice Shepard shares an historic copy of *The History of the Common Law of England* with library staff.

YEAR IN REVIEW

July 9 The Court requested public comments on proposed changes to the Administrative, Appellate, and Trial rules. Among the proposals were the requirement that all clerks and courts in the state accept forms approved by the Supreme Court or Coalition for Court Access and the removal of life without parole cases from mandatory Supreme Court review.

July 9 The Indiana Office of Court Services held its annual Trial Court and Clerk Conference. About 330 people attended the one-day event in Noblesville with a keynote address on active listening and the power of stories in the pursuit of justice. Participants learned about topics like mental health competency cases, protection orders and trauma, jury management, remote hearings and ethics, cameras in courts, and recent legislation.

July 17 Chief Justice Loretta Rush was named one of Indiana's Top 250 most Influential Business Leaders by the *Indiana Business Journal*. For the third consecutive year, she was honored for the positive impact she has in government.

July 18 The Indiana Conference for Legal Education Opportunity welcomed 16 new fellows as they completed the 2024 Summer Institute at Indiana University Robert H. McKinney School of Law in Indianapolis. ICLEO focuses on teaching concepts that students will learn in the first year of law school and provides opportunities for professional development.

August 15 The Commission on Indiana's Legal Future published an interim report, and the Court solicited comments from the public. The report outlined 27 recommendations, including funding for pilot programs and grants and suggestions for legislative and court rule changes. In October, the Court responded with an order in support of the commission's work, and in July 2025, the commission delivered its final report to the Court.

August 21 The Judicial Nominating Commission unanimously voted to reappoint Loretta Rush as Chief Justice of Indiana. The four other justices—Mark Massa, Geoffrey Slaughter, Christopher Goff, and Derek Molter—shared thoughts with the commission, including their support for Chief Justice Rush to continue leading Indiana's judicial branch.

August 21 The Commission on Improving the Status of Children in Indiana released its 2024 annual report highlighting ongoing collaboration across state government to benefit youth and families.

September 9 The Office of Admissions and Continuing Education announced that 341 aspiring lawyers passed the July 2024 bar exam.

September 13-14 More than 500 volunteers, staff, and directors attended the annual GAL/CASA Conference in Fort Wayne. Participants heard from former youth in the child welfare system, family law judges, and long-time child advocates from across the state. This year's conference, with the theme, "Change a Child's Story," included education sessions on transformational mentorship, the importance of child-centered court reports, and how trauma can lead to addiction.



Read more about Indiana's Legal Future on page 38



YEAR IN REVIEW

September 17 Fifty-five judicial officers visited with over 4,300 students and civic group members to celebrate Constitution Day and teach young people about the judicial branch.

September 18-20 Over 680 judges from across the state gathered for the annual meeting of the Judicial Conference of Indiana. During the conference, judicial officers chose from more than 20 breakout sessions and learned about topics including criminal, civil, family, and election law; cameras in court; behavioral health; procedural fairness; and ethics. More than 40 judicial officers were recognized for educational achievements, and 11 were honored for 24 years of service.

October 1 The justices heard oral arguments in *Kiera Isgrig v. Trustees of Indiana University* at South Newton High School—Justice Molter’s alma mater—in Newton County. The Court occasionally schedules arguments

outside the capital, allowing students, the press, and the public in other areas of the state the opportunity to see the work of the Supreme Court.

October 3 In its first advisory opinion for lawyers published during the fiscal year, the Disciplinary Commission explores how an attorney can avoid improper ex parte communications while protecting client interests. Advisory Opinion #2-24, “Avoiding Improper Ex Parte Communications,” touches on ethical minefields involving modification of custody orders, last-minute changes to visitation schedules, orders of protection, emergency petitions for guardianship, and in-chambers meetings.

October 8 The inaugural Court Reporter Symposium was held in South Bend with 80 court personnel in attendance. Five hours of training was provided on active listening, juvenile cases, the guardianship registry, ethics, and case processing.

October 18 The Indiana Bar Foundation and the Coalition for Court Access hosted the 2024 Civil Legal Assistance Conference for providers, pro bono lawyers, members of the

judiciary, and others who help deliver civil legal aid to Hoosiers of low and modest means. Justice Slaughter was one of two speakers at the opening plenary session.

October 18 The Court requested public comments on proposed changes to the Alternative Dispute Resolution, Small Claims, Tax, Trial De Novo, and Trial rules. Among the proposals were a reorganization of the Indiana Tax Court Rules to align with the Appellate Rules and a change that would allow for the opportunity to use the Rules for Alternative Dispute Resolution in small claims cases.

October 24-25 About 50 city and town court judges attended a two-day annual meeting in Carmel. Attendees learned about infraction and ordinance violations, generational differences, operational considerations, ethics, wellness, and procedures for misdemeanor cases for nearly 11 hours of education credit.

Pictured at left. Clockwise from top left: Stan Piercefield, Morgan County CASA, presents the Volunteer of the Year award to Myra Brown. Marion County Magistrate Stefanie Crawford visits students at Brookview Elementary to celebrate Constitution Day. Chief Justice Rush presents Lake County Magistrate Lisa Berdine with a certificate for graduating from the Indiana Judicial College. Justices hear oral arguments at South Newton High School.

 **Read more about Traveling Oral Arguments on page 16**

YEAR IN REVIEW

October 29-30 About 350 participants attended a conference in Fort Wayne hosted by the Juvenile Detention Alternatives Initiative. Justice Massa welcomed attendees to two days of education focusing on the theme of building tomorrow together. Participants learned about topics like effective programming for engaging and empowering parents, diverting youth and connecting youth to services, and strategies for overcoming treatment barriers.

November 1 National Adoption Month kicked off around the country. Photos and videos of uncontested adoption proceedings show the joy of families coming together. A partnering organization, FireFly, had 38 courts in 35 counties request 354 gift bags to distribute to adopted children.

November 5 On General Election Day, voters statewide made the decision to select “yes” or “no” on whether to retain each of three Indiana Supreme Court justices. Justices Massa and Molter and Chief Justice Rush were retained in office for an additional ten years each.

November 13 After distributing about 4,400 ballots to eligible voters and counting the votes received, the Clerk’s Office announced Steve L. Williams as the winner of the District 1 election to fill an attorney vacancy on the Judicial Nominating Commission.

November 22 The Supreme Court established a Guardianship Oversight Task Force—with a final report due December 1, 2025—to research best practices, innovative programming, and potential reforms that will lead to better outcomes for all stakeholders, including protected persons and people at risk of guardianship.

December 9 The Court Improvement Program and the Commission on Improving the Status of Children hosted a listening session between foster parents and a panel of four judges with expertise in juvenile law. The foster parents and judges engaged in dialogue to identify systemic areas of concern regarding Indiana’s child welfare system and recommendations for improvement.

December 9-12 Seventy newly elected and recently appointed judicial officers attended a four-day orientation, with topics such as transitioning to the bench, employment and family law, working with court personnel, media training, language access, procedural fairness, and evidence. Over 90 new judges attended part two of the orientation later in January. They learned about case management, domestic relations, remote hearings, judicial ethics, and the impact of the career on family.

December 11 Around 220 fourth grade students visited the Supreme Court Courtroom on Statehood Day as part of an annual celebration marking the anniversary of Indiana joining the United States. The students learned about the courtroom, tried on judges’ robes, and took group photos standing on the lower bench.

December 13 Justice Goff gave opening remarks at the 2024 Winter Workshop for judges. Over 150 judges and staff attended the one-day event, with the theme, “Vulnerable Hoosiers in Court: Behavioral Health and Guardianship Matters.”





YEAR IN REVIEW

December 17 The Supreme Court held its annual employee recognition ceremony to celebrate staff members with longtime service and thank all staff for their hard work throughout the year. Twenty-four staff were honored—including three with 25 years and one with 20 years—and together they had a combined 365 years working for the Supreme Court.

January 1 The Court adopted new Guidelines for Guardians ad Litem, designed to bring consistency and accountability in civil family law cases where a GAL is utilized. Now, a GAL must be certified and appear on a registry of certified guardians to be eligible to serve in an Indiana case. The GAL registry was published February 26.

January 7 Governor Eric Holcomb presented the Indiana Supreme Court justices with the Sagamore of the Wabash award for distinguished service to the state.

January 29 Chief Justice Rush delivered her eleventh State of the Judiciary to a joint session of the Indiana General Assembly and over 200 special guests including 140 trial court judges. In the speech, titled “Your Indiana Judiciary,” the Chief Justice highlighted the work of

judicial officers in Indiana’s 92 counties where 98% of court business is conducted. She spoke about their work to strengthen families, protect children and vulnerable adults, and enhance public safety and access to justice.

January 31 The Indiana Judicial Conference published proposed changes to the Rules for Court-Administered Alcohol and Drug Programs, requesting public comments over a 30-day period. The changes were approved and became effective May 15.

March 4 State legislators, community leaders, and advocates attended CASA Day at the Statehouse, celebrating the 35th anniversary of the program’s advocacy for children experiencing abuse or neglect. Speakers at the event included Chief Justice Rush, state representatives, and other CASA leaders, as well as volunteers and members of impacted families, who shared stories about reunification, finding connection through placements, and the hope CASA volunteers give to the children they advocate for.

We give *thanks* for
their long service to the
Indiana Supreme Court

25 years

Jennifer Bauer

Darla Little

Marie Schelonka

20 years

Teri Simmons



Pictured above. Students participate in Statehood Day activities in the Indiana Supreme Court Courtroom.



Read more about Guardians ad Litem on page 50



YEAR IN REVIEW

March 10-11 Chief Justice Rush welcomed about 80 new and experienced judges to an orientation and refresher program in Carmel on handling child in need of services and juvenile delinquency cases. Topics included CHINS overview; permanency, safety, and well-being; and termination of parental rights, delinquency, and juvenile docket management.

March 31 ICLEO received 89 applications and accepted 18 students to the 2025 Summer Institute at IU McKinney School of Law in Indianapolis.

April 4 The Court requested public comments on proposed changes to two Administrative Rules: one that would establish remote hearings as part of normal court operations and the other which would allow the public, media, and attorneys to bring electronic devices into all courthouses around the state.

April 7 In its second advisory opinion for the fiscal year, the Disciplinary Commission looks at key considerations for successfully

and ethically managing a lawyer leaving employment at a law firm. In Opinion #1-25, “Navigating a Lawyer’s Departure from a Law Firm,” the commission reviews rules that should be followed by the departing lawyer and those to be followed by the firm and covers topics such as conflicts, competency, fees, and duty to notify.

April 10 The Court heard a consolidated oral argument in two cases, *Kaur and Estate of Dhillon v. Amazon* and *Oukbu v. Amazon*, at Indiana Wesleyan University in Grant County. About 1,000 students from area high schools and universities attended and had an opportunity after the argument to ask the justices questions about work-life balance, becoming a judge, and the characteristics that make a good law student and a good lawyer.

April 14 The Office of Admissions and Continuing Education announced that 87 aspiring lawyers passed the February 2025 exam. Five graduates of Purdue Global Law School were among those who passed and were the first graduates of the online law school to be admitted to the Indiana Bar later in May.

Pictured at left. CASA volunteers and staff gather in the atrium at the Statehouse to celebrate 35 years of CASA on annual CASA Day.

Pictured at right. The Court hears oral argument at Indiana Wesleyan University.





Pictured above. Left: Chief Justice Rush presents Gregory Werich (alongside his staff) with the Order of Augustus. Right: State employees learn about the Supreme Court Law Library's rare books.

April 15-17 Both the Spring Judicial Conference and the annual Justice Services Conference were held in Indianapolis at the Convention Center. About 400 judicial officers chose from over 20 sessions including those covering search & seizure, the new GAL Guidelines, red flag laws, and ethics. Over 1,100 justice services staff were offered more than three dozen different sessions including language access, trauma-informed practices, family engagement, neurodivergence, and fentanyl exposure. During the Justice Services Conference, 40 probation officers were recognized for 25 years of service, and Wells County Chief Probation Officer Gregory Werich was awarded the Order of Augustus.

April 29-May 1 The Supreme Court Law Library celebrated Law Day by presenting highlights from the library's rare book collection to about 60 state employees, who had the opportunity to touch and learn about books ranging in date from 1565 to 1896.

May 18 Justice Goff graduated from Duke University with a Master of Laws (LLM) after completing a program designed for judicial officers. The program required eight weeks on campus at Duke Law over two years as well as a thesis. Justice Goff's thesis focused on the alignment of the justice system with the behavioral health system.

June 4 The Court Improvement Program released the 2024 Court Performance Measures Report showing the median time

to permanency dropped 10%, from 611 days to 549 days and that reunification, the most common outcome, occurred in over half of cases, typically within 390 days.

June 5-6 About 80 judges attended the Juvenile Judges Annual Meeting in Plainfield. This two-day conference included education sessions on behavioral health, lessons learned from lived experiences in foster care, the new GAL registry, juvenile case law, and ethics.

June 8-13 Thirty judicial officers attended the second year of the two-year Graduate Program for Judges in French Lick. During the program, judges learned about critical challenges posed by AI to privacy and security in the workplace, healthcare, and judicial system; legal issues facing the family; freedom of contract and



Pictured. Left: Guardianship symposium. Right: Graduate program judges.

private ordering and the constraints placed on it by political branches and the courts; and judging genocide, an experiential learning opportunity.

June 16 Representative Victoria Garcia Wilburn presented House Concurrent Resolution 34 to the State Office of GAL/CASA recognizing the important work of Guardians ad Litem and Court Appointed Special Advocates in giving a voice to abused and neglected children.

June 26 About 140 guardians and other stakeholders participated in the annual Adult Guardianship Symposium in Indianapolis, an education event featuring topics including less restrictive alternatives to guardianship, changes to Medicaid, accountability to the court, and best practices.

June 30 The Court closed the fiscal year; it heard 48 oral arguments, wrote 50 majority opinions, and disposed of 692 cases.



Office of Judicial Administration

Justin P. Forkner • Chief Administrative Officer

The Office of Judicial Administration consists of ten agencies and the Clerk of the Appellate Courts. The Chief Administrative Officer, who oversees OJA, reports directly to the Chief Justice of Indiana and serves as the link between the Chief Justice and the Court's agencies.

OJA agencies work collaboratively to support the Supreme Court's case work and administrative obligations. Often with dual roles of compliance enforcement and providing support, the office provides education, outreach, innovation, funding, and standards to courts, clerks, and judicial branch stakeholders across Indiana. OJA also licenses attorneys, aids in judicial selection, provides support for lawyers and judges, and monitors their professional accountability.



85
bulk data
requests



286
days of
education



8.5 M
page views at
courts.in.gov



\$21.8 M
in grants distributed
to counties

Office of Judicial Administration

REGULATORY

Admissions & Continuing
Education

Judges & Lawyers Assistance

Judicial & Attorney Regulation

MANAGEMENT

Behavioral Health

Communication, Education
& Outreach

Fiscal, Operations & Personnel

General Counsel

Innovation

OPERATIONS

Court Services

Court Technology

Appellate Clerk's Office

Agencies

REGULATORY

Admissions & Continuing Education

Bradley W. Skolnik • Executive Director

The Office of Admissions & Continuing Education provides staff support to the Board of Law Examiners and Commission for Continuing Legal Education. ACE also maintains the Roll of Attorneys, which is the roster of attorneys licensed to practice law in Indiana. BLE certifies that all individuals admitted to practice law have fulfilled the requirements for admission. CLE oversees the legal education requirements of attorneys, judges, and mediators; maintains a mediator registry; and accredits independent attorney specialization organizations.

Judges & Lawyers Assistance

Terry L. Harrell • Executive Director

The Judges & Lawyers Assistance Program provides compassionate support to judges, lawyers, and law students. By promoting well-being and fostering connection, it serves to elevate the competence of the profession. All interactions with JLAP are confidential, including those that are court-ordered and those that are voluntary.

Judicial & Attorney Regulation

Adrienne L. Meiring • Executive Director

The Office of Judicial & Attorney Regulation provides staff support to the attorney Disciplinary Commission, the Judicial Qualifications Commission, and the Judicial Nominating Commission. These commissions serve to protect the public, courts, and members of Indiana's bar from misconduct on the part of attorneys and judges while also protecting attorneys and judges from unwarranted claims of misconduct.

At the direction of the commissions, the office investigates and prosecutes allegations of judicial and attorney misconduct and fitness to practice law. It also provides ethical guidance and advisory opinions for judges and lawyers. Office staff support the work of the Judicial Nominating Commission, which interviews applicants and selects nominees for appellate court vacancies, selects the chief justice, and certifies senior judges.

✓ MANAGEMENT

Behavioral Health

Brittany Kelly • Behavioral Health Administrator

The Office of Behavioral Health prioritizes behavioral health related needs of Indiana's courts and the litigants they serve. The office connects judicial officers and justice system professionals to resources in their communities and provides education on matters of behavioral health. The office supports the Behavioral Health Committee in equipping justice system stakeholders with best practices to recognize and respond appropriately to mental health, substance use, and co-occurring conditions in the courts.

Communication, Education & Outreach

Kathryn R. Dolan • Chief Public Information Officer

The Office of Communication, Education & Outreach manages media inquiries and creates opportunities for the community to engage with Indiana's courts. OCEO oversees the judicial branch website and social media

accounts, oral argument webcasting, the Supreme Court law library, and supports justices who serve as local nominating commission chairs. The office also creates and distributes press releases and coordinates messaging campaigns on a variety of topics.

Fiscal, Operations & Personnel

Aaron V. Hood • Chief Financial / Operating Officer

The Fiscal, Operations & Personnel Office manages the Supreme Court's budget and assets; processes financial transactions and invoices, including payroll and benefits; manages state and federal grants; provides accurate, timely financial information to the Court and other government officials; provides security to the justices and Court agencies; manages building operations and continuity of operations for the Court; and assists Supreme Court agencies with hiring, performance, and employee engagement.

General Counsel

Heather R. Falks • General Counsel

The Office of General Counsel provides ethical guidance and legal services to the Supreme Court and its agencies, including drafting internal policies, managing legal research projects, responding to discovery requests, reviewing and negotiating contracts, and ensuring compliance with state and federal laws. The office also provides contract and employment law counsel to state courts, provides legal advice on county authority and general legal problems, and consults with the Attorney General on litigation involving the courts as a party.

Innovation

Robert A. Rath • Chief Innovation Officer

The Office of Innovation leads process improvement initiatives and promotes innovation, creative problem-solving, and a culture of continuous improvement within the Office of Judicial Administration.

⚙️ OPERATIONS

Court Services

Catheryne Pully • Executive Director

The Indiana Office of Court Services develops education, programs and projects, and provides resources to improve both the administration of justice and outcomes for those involved in the court system. The office certifies local court programs, supports pretrial and probation services, distributes grant funds, collects court data, and provides a wide variety of training and technical support. IOCS serves as the legal and administrative staff agency for the Supreme Court. And it supports the Judicial Conference of Indiana—the body of elected trial court judges, which is chaired by the chief justice—its board of directors, and its various committees.

Court Technology

Mary L. DePrez • Executive Director

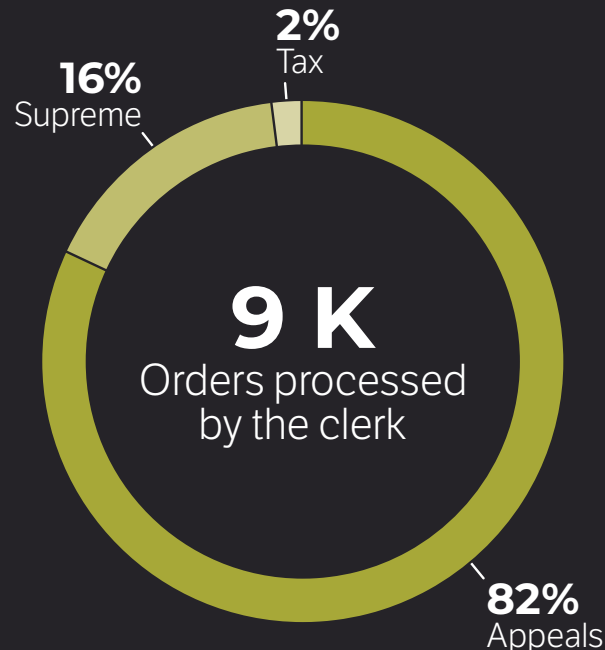
The Indiana Office of Court Technology provides support to trial and appellate court staff for day-to-day operations; assists the Supreme Court with creating a vision for how technology can improve court operations and access to justice; develops custom applications for data sharing with the public and local, state, and federal agencies; and supports thousands of users across the state with case management, e-filing, and other technology needs.

APPELLATE CLERK

Clerk of the Appellate Courts

Gregory R. Pachmayr • Clerk

The Office of the Clerk of the Supreme Court, Court of Appeals, and Tax Court processes incoming filings and outgoing orders and opinions for Indiana's appellate courts. The clerk's office responds to inquiries from attorneys, litigants, and the public and oversees the archiving of closed cases.



3.6 K

appellate cases managed by the clerk



14 K

e-filed briefs processed by the clerk



18 K

transcript/exhibit volumes processed by the clerk

SOLUTIONS TO Indiana's Legal Services Shortage

Indiana has a shortage of attorneys, driving an access to justice issue across the state. Our legal leaders have been engaged in an ongoing conversation about how to address the problem, which goes beyond simply “more lawyers.”

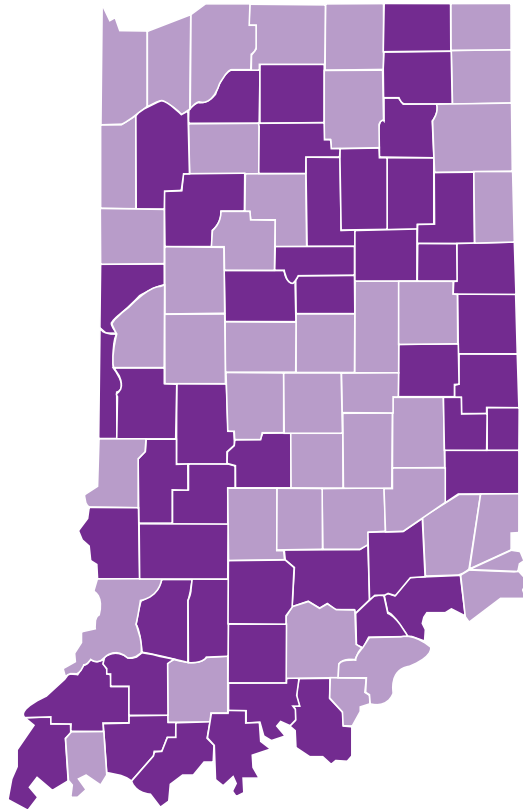
In 2024, the Supreme Court established the Commission on Indiana's Legal Future tasked with addressing key areas for improvement. The commission issued its interim report in August 2024, and in October that year, the Supreme Court responded with an order addressing each recommendation and encouraging the commission to continue its work.

Recommendations approved by the Court include:

- Proposed rule changes to be opened for public comment, including those that would allow the use of alternative dispute resolution rules in small claims cases and that would allow use of electronic devices in courthouses around the state

- Approved rule changes, including one that defines Indiana's areas of legal need and another that allows reciprocal attorney licensing in Indiana even if the lawyer's original state of admission has rules that are less restrictive than Indiana's
- Grants to courts for local technology and remote facility needs
- Grants for lawyers who practice in legal deserts for student loan repayment or as startup subsidies
- Exploration of how the legal profession is regulated, directing the Innovation Committee to develop parameters for a legal regulatory sandbox

In its final report to the Supreme Court, the commission presented 15 additional recommendations on further action and discussed the origins of the legal services shortage, the need for additional law schools, and the increase of student debt.



LEGAL DESERTS

Any county that has a ratio of less than 1.0 for attorneys (by business address) to total population.



978
registered
mediators



19,213
active attorneys in the
Roll of Attorneys

Pro Bono Contributions

by Indiana attorneys in 2023



8,160
attorneys contributed time and/or
money to pro bono legal services



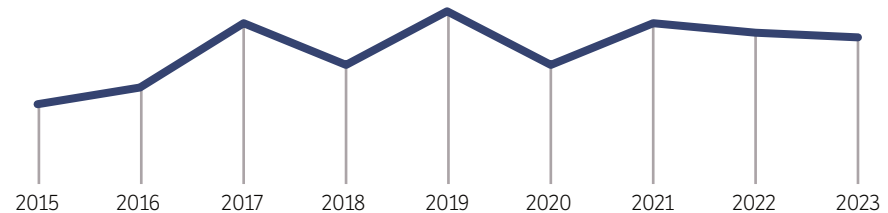
53%
of attorneys contributed
(of the 15,434 lawyers who reported their pro
bono data for 2023, 7,274 attorneys reported no
contributions of money or hours)



379,493
hours of legal work at no charge
(another 219,123 hours offered at a reduced rate)



\$1.33 M
in monetary contributions



MONETARY CONTRIBUTIONS OVER TIME

from about \$775 K in 2015 to as high as \$1.55 M in 2019

This data, current as of Feb. 11, 2025, was self-reported by 22,269 attorneys licensed in Indiana during annual attorney registration. Of those, 6,835 attorneys were exempt from reporting because—as judicial officers, government employees, or retired/inactive attorneys—they cannot provide pro bono services.

Bar Admissions



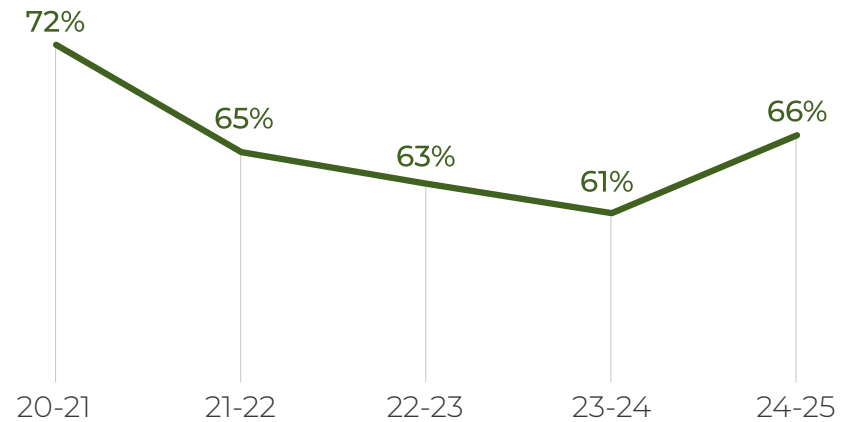
428 of 652
applicants passed
the bar exam



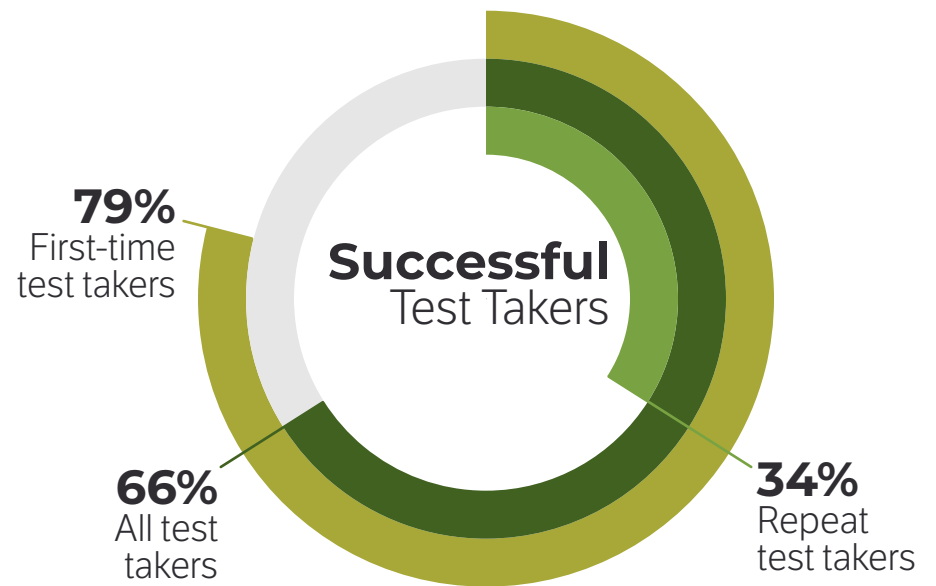
237
applicants transferred a
UBE score from another
jurisdiction

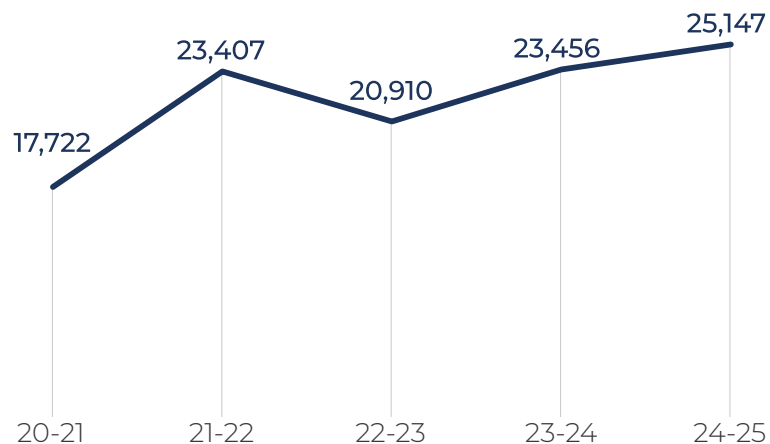


92
out of state lawyers
admitted on motion



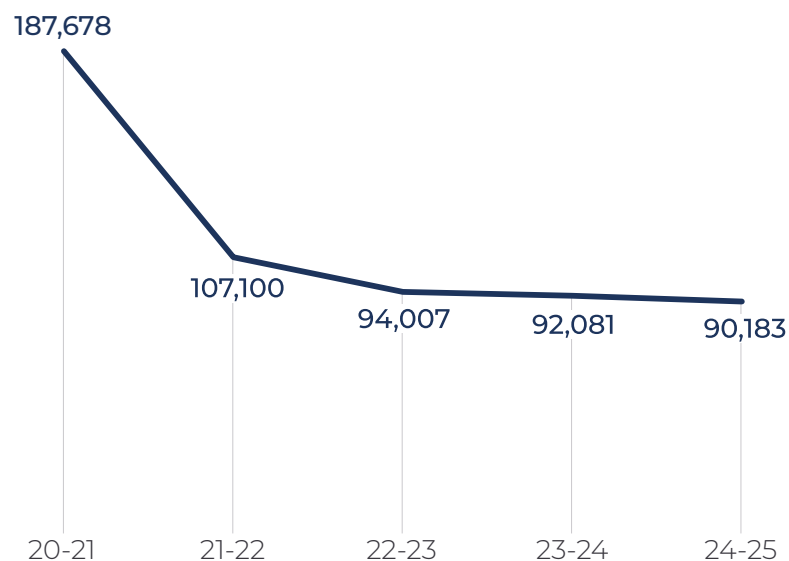
BAR PASSAGE RATES
Five-year trend





CLE COURSES ACCREDITED

by ACE, five-year trend



DISTANCE EDUCATION CREDITS REPORTED

by attorneys and sponsors, five-year trend

Continuing Legal Education



25 K
CLE courses
accredited



90 K
Distance education
credits reported



159
Attorneys suspended for
noncompliance with
CLE or fee requirements

Judicial Branch Education

OJA offered more than 1,100 hours of training to judicial officers and other justice system stakeholders covering a variety of topics, including:

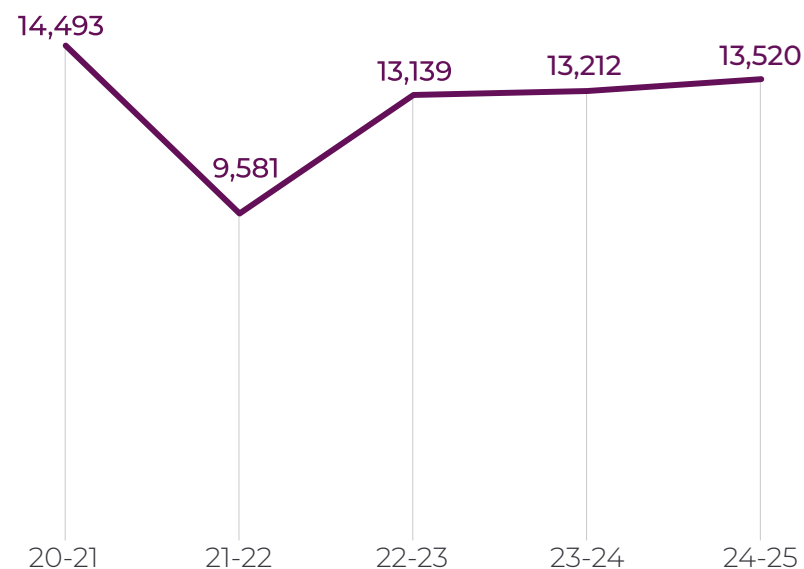
- New guardian ad litem guidelines and their implementation
- Updates in criminal law, family law, civil law, recent legislation, new rules, and the weighted caseload study
- Case management and best practices in probation; problem-solving treatment courts; and criminal, civil, and domestic relations cases
- Behavioral health, judges and psychiatrists in partnership, co-occurring disorders, suicidal ideation, non-suicidal self-harm, and "Question, Persuade, Refer" suicide prevention
- Procedural fairness, language access, generational differences, and understanding neurodivergence to support clients and their families
- Family law issues, family and intimate partner violence, family engagement and family-engaged case planning
- Artificial intelligence, technology, data, privacy, and security
- Trauma informed practices in courts and in treatment programs, how trauma becomes addiction



13 K
justice stakeholders
at education events



1.7 K
users in the learning
management system



ATTENDEES AT EDUCATION EVENTS

Five-year trend

JUDICIAL ADMINISTRATION



283
on-demand
courses available



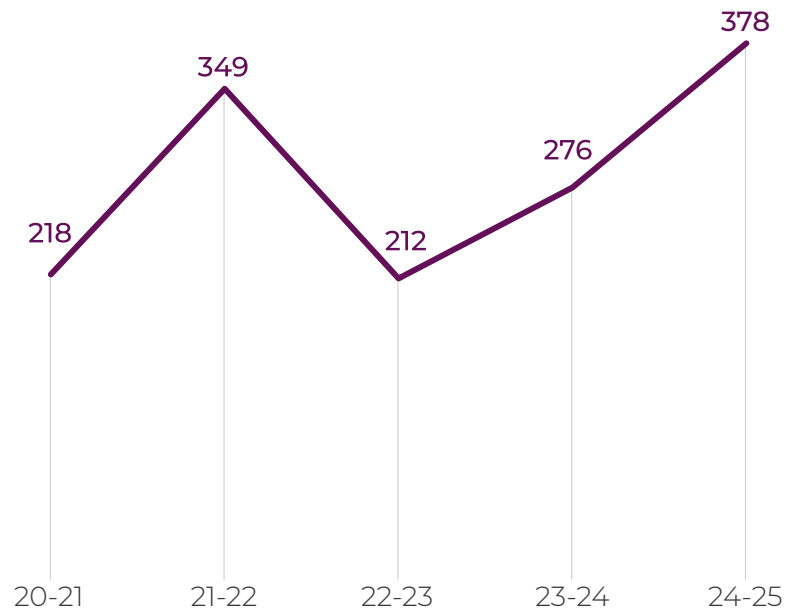
95
live virtual training
programs offered



410
new judges and staff
attended an orientation
program

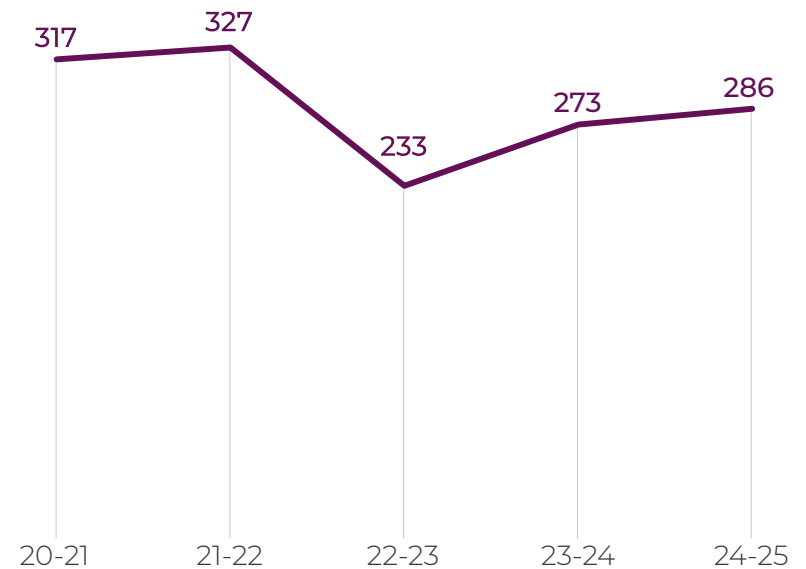


2 K
people received a
certification (e.g., risk
assessment)



LIVE AND ON-DEMAND VIRTUAL COURSES

Five-year trend



DAYS OF EDUCATION

Five-year trend

Weighted Caseload Study

A comprehensive weighted caseload study completed in 2024 showed the number of judges in the state—around 485 full-time judges—basically met the level of need compared to the state’s caseload, which is about one million new cases each year.

The Weighted Caseload Study serves two primary purposes: to objectively assess the number of judicial officers the state needs and where it needs them. By assigning consistent case weights to different case types, the study standardizes the assessment of judicial workload across various jurisdictions, which may differ in geography, population, and caseload composition.

The study—conducted by the National Center for State Courts—utilized an event-based methodology, aggregating time spent on different segments of the case life cycle, such as pre-judgment, trial, and post-judgment activities. This approach provides a reliable estimate of the total time needed to process a case, based on observations from thousands of individual case events. The study involved participation by 359 judicial officers from all but one of Indiana’s 92 counties.

Ultimately, Indiana’s rate was shown as having balance. Indiana had 488.61 judicial officers, while the actual need was 480.55. While the statewide utilization rate



488
full-time judges
in Indiana



480
full-time judges
Indiana needs to
handle its caseload



.98
statewide utilization
of judges

was 0.98, remarkably close to the optimum 1.00, the distribution of judicial resources was uneven across counties. Sharing judicial resources across county lines is permitted by Administrative Rule 1 and is encouraged for counties with utilizations under 1.00 to help surrounding counties with need.

A significant insight from the study was the increasing complexity of cases, driven by modern technology and changes in laws, which complicate case processing. Judges reported feeling rushed, particularly in family cases, and expressed concerns about their growing administrative duties.

The study highlights the importance of focusing on judicial time spent on specific cases rather than merely looking at the number of cases divided by the time available. While infractions (like traffic tickets) are the most frequently filed cases, they account for a small percentage of judicial time. In contrast, Level 6 felonies and domestic relations with children are among the most time-consuming cases.

In response to action by the General Assembly, the judiciary continues working on methods to most accurately assess judicial officer need across the state, including the weighted caseload measures.

Judicial Selection & Retention

County Vacancies

Four Indiana counties use a merit selection system to nominate superior court judges: Allen, Lake, Marion, and St. Joseph. Each of the local nominating commissions in these counties is chaired by a Supreme Court justice. During the fiscal year, the Allen, Lake, and Marion County nominating commissions each worked to select nominees for a vacancy. St. Joseph County had no vacancies to fill.

Allen County Judicial Nominating Commission • Hon. Christopher Goff, Chair

Hon. David Avery retired

6 applicants
Hon. Jason C. Custer appointed
November 2024 by Gov. Eric Holcomb

Lake County Judicial Nominating Commission • Hon. Mark Massa, Chair

Hon. Stephen E. Scheele appointed to Court of Appeals

5 applicants
Hon. Daniel W. Burke appointed
May 2025 by Gov. Mike Braun

Marion County Judicial Selection Committee • Hon. Derek Molter, Chair

Hon. John Hanley retired and Hon. Mark Stoner retired

27 applicants
Hon. Tara Y. Melton and
Hon. James K. Snyder appointed
December 2024 by Gov. Holcomb

Appellate Vacancies

The Judicial Nominating Commission, chaired by Chief Justice Rush, worked to fill two vacancies during the fiscal year.

Hon. Patricia A. Riley retired

8 applicants
Hon. Mary A. DeBoer appointed
September 2024 by Gov. Holcomb

Hon. Terry A. Crone retired

7 applicants
Hon. Stephen E. Scheele appointed
December 2024 by Gov. Holcomb

Appellate Judge Retention

Two Court of Appeals judges and three Supreme Court justices were on the November 2024 General Election ballot asking voters to decide “yes” or “no,” should the judge(s) be retained. All five judges were retained in office, including Supreme Court Justices Mark Massa, Derek Molter, and Chief Justice Loretta Rush.

Chief Justice Selection

In August 2024, the Judicial Nominating Commission unanimously voted to reappoint Loretta Rush as Chief Justice of Indiana. The Nominating Commission appoints Indiana’s Chief Justice every five years.

Selection of Commercial Court Judges

Judge Andrew Hicks of Elkhart Superior Court was selected in January 2025 by the Supreme Court to serve as one of ten commercial court judges around the state. He replaces Judge Stephen R. Bowers who retired in 2024.

Judge Daniel J. Moore of Tippecanoe Superior Court was selected in April 2025 to become the eleventh commercial court judge beginning June 1, 2025.

Attorney & Judicial Discipline

Allegations of attorney misconduct

The Disciplinary Commission received 1,639 complaints against attorneys from the public and, after review, dismissed 1,535 as having no valid issue of misconduct.

The Court issued two *per curiam* opinions in discipline cases detailing how the lawyers in question violated ethics rules. The Court disbarred one attorney for improper sexual relations with three clients. In deciding that disbarment was the appropriate sanction, the Court noted the attorney had exploited highly vulnerable clients by taking advantage of the power imbalance of the attorney-client relationship and the clients' histories of substance use, sexual abuse, and other trauma.

Another lawyer was suspended for signing and notarizing case managers' names on multiple CHINS petitions without the managers' knowledge or consent. The Court emphasized that a severe sanction was warranted because there is a fundamental breach in trust that occurs when an attorney falsely signs or notarizes legal documents, even when done for expediency rather than selfish interest.

Four other lawyers decided to resign their law licenses and not contest disciplinary charges after the charges were filed.

Allegations of judicial misconduct

The Judicial Qualifications Commission began the year with 168 complaints pending. The commission received 773 complaints alleging judicial misconduct. Of the total 941 complaints before the commission, 755 were dismissed summarily as failing to raise valid issues of ethical misconduct or were dismissed with advisory letters on better practices. The commission had 146 complaints awaiting review at the end of the fiscal year.

In the remaining 40 cases, the commission required judges to respond to the allegations or conducted formal inquiries or investigations. One of these matters was dismissed as not establishing ethical misconduct. The commission issued four advisory letters, eleven private cautions, and three deferred resolutions. Three investigations were closed after the judicial officer resigned, retired, or took corrective action.



82

requests from attorneys for ethics guidance



20

verified complaints against attorneys

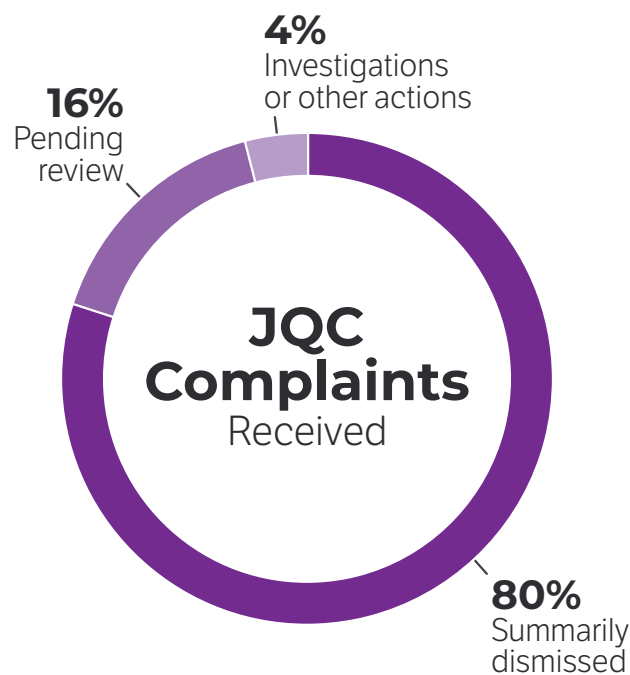


26

overdraft notices sent to attorneys

Public disciplinary charges were filed in four matters. In one case, the commission filed formal charges against a judge for making injudicious statements about women who bring unjust enrichment cases against former cohabitating partners and for repeatedly ruling on motions without giving the opposing party an opportunity to respond. The commission and the judge agreed to a conditional agreement for discipline resulting in a public reprimand.

In another case, the commission filed formal charges against a judge for sexually harassing court employees by making sexual innuendos and by engaging in unwanted hugging and other physical contact. The Court accepted a conditional agreement for discipline from the commission and the judge, imposed a 30-day suspension without pay, and required the judge to undergo training to prevent sexual harassment.



The commission filed formal charges on two matters that remained pending at the end of the fiscal year. One matter involved allegations that a judge of a problem-solving court made injudicious statements to staff and participants and failed to recognize appropriate ethical boundaries between himself and participants of the problem-solving court, resulting in questions about the judge's impartiality. The commission also filed formal charges against a former judge for allegedly conducting an ex parte investigation by visiting the home of a defendant without the prosecutor or defense counsel present.

At the end of the fiscal year, there were 14 pending investigations.

Rules of Court

The Supreme Court handed down 13 rule amendment orders during the fiscal year, resulting in changes to nine rule sets and the adoption of one new rule set. In addition to adopting the new Guardian ad Litem Guidelines for Civil Family Law Cases, the Court also approved changes requiring clerks and trial courts to accept all forms approved by the Supreme Court or Coalition for Court Access, relaxing parameters for admission to the bar without examination, and rewriting the Commercial Court Rules to use plain English.

Rule Set	Effective	Description of Amendment
Administrative Rules	1/1/2025	Rule 1 (E) – Preparation and Filing of Statistical Reports. The amendment to Rule 1(E) of the Administrative Rules adds language on the authority of judicial officers to sit in other courts. Rule 8 (B) – Uniform Case Numbering System. Creates new civil case types for commercial court cases, grandparent visitation, and judicial review of administrative agency decisions.
Admission and Discipline Rules	10/15/2024	Rule 1.2 – Legal Need. Provides terms identifying areas of high legal needs. Rule 6 (1)(c) – Admission Without Examination. Eliminates the requirement that a lawyer be licensed in another state with a reciprocal licensing status no less restrictive than Indiana's.
Admission and Discipline Rules	5/15/2025	Rule 6.1 – Temporary License. Permits granting a temporary license to practice law in Indiana by transfer of the Uniform Bar Examination Score. Rule 13 Section 4 – Waiver of Educational Qualification. Permits the Board of Law Examiners to waive the educational requirement for an applicant who has or will have graduated from a law school located in the United States that is not approved by the ABA or will be eligible upon graduation from that law school to take the bar examination in another state or will have completed legal education in a jurisdiction outside the United States.
Alternative Dispute Resolution Rules	1/1/2025	Various. Encourages use of a wide variety of ADR methods. Encourages mediators to provide their services pro bono by receiving one hour of Continuing Mediation Education credit per year if they complete at least one pro bono mediation during that year. Limits the rules to non-binding forms of ADR and adds judicial review/approval of arbitration agreements involving the care, support, and/or assets of children or incapacitated adults. Allows for the opportunity to use the Rules for Alternative Dispute Resolution in small claims cases.
Appellate Rules	1/1/2025	Rule 11 – Duties of Court Reporter. Requires a court reporter to serve a copy of a motion for extension of time to file the transcript on the trial judge in addition to the parties to the appeal; requires the appellant to serve a motion to compel on the trial judge and parties to the appeal.

JUDICIAL ADMINISTRATION

Rule Set	Effective	Description of Amendment
Commercial Court Rules	7/1/2024	All. Revises language used throughout to plain English, adds a new rule (Rule 5) that addresses venue for jury trials, provides commentary to the rule on discovery (upon amendment, Rule 7), and changes the term "special masters" to "court-appointed neutrals."
Commercial Court Rules	10/1/2024	Rule 2 (A)(12)(k) – Cases Eligible for the Commercial Court Docket. Corrects a scrivener's error.
Criminal Rules	1/1/2025	Rule 1.4 (A)(5) – Investigative Process. Clarifies when discovery procedures apply in the investigative process. Rule 2.4 (B) – Change of venue or judge. Corrects a drafting error. Rule 2.7 (A) – Written Motions and Legal Memorandum. Clarifies that a defendant must file a separate legal memorandum with a motion to dismiss. Rule 4.2 – Commencement of Rule 4 Time Periods for Those Incarcerated Outside of State or in Another County. Adds new paragraph (C) to clarify when the time period tolls if a defendant is charged in one Indiana county prior to being incarcerated in a different county.
Guardian ad Litem Guidelines for Civil Family Law Cases	1/1/2025	All. Adoption of these guidelines provides rules for the qualification, training, and roles and responsibilities for Guardian ad Litem in civil family law cases.
Post-Conviction Remedies Rules	1/1/2025	Rule 1 (4) – Pleadings. Updates the change of venue reference and updates the transcript requirement for a challenge to a sentence imposed following a guilty plea.
Professional Conduct Rules	10/1/2024	Rule 1.15 – Safekeeping Property. Corrects a scrivener's error.
Trial Procedure Rules	1/1/2025	Rule 3.1 – Appearance. Adds language on substitution of appearance and written notice of intent to withdraw appearance. Rule 6 – Time. Adds language on automatic enlargement of time and response and reply deadlines. Rule 7 – Pleadings and motions. Revises language on pleadings allowed and adds language on requests for hearings and written motions for continuances. Rule 10 – Form of pleadings, motions, memorandum and briefs. Adds language on form of pleadings, motions, memoranda, and briefs regarding page size, print size, spacing, numbering, and margins. Rule 53.5 – Continuances. Deleted. Rule 82 – Forms. Requires clerks and trial courts to accept for filing court documents generated from forms approved by the Supreme Court or Coalition for Court Access.

NEW PROCEDURE FOR REGISTERING Guardians ad Litem

A Guardian ad Litem (GAL) is a person appointed by a court to represent and protect the best interests of a child in civil family law cases, such as divorce, custody, and paternity cases. But until this year, Indiana did not have a clear directive on what a GAL's ethical and professional responsibilities are, what kind of training they should have received, and what kind of qualifications a person should have to become a GAL. The lack of guidance caused vast differences in practice across Indiana and confusion for the public.

Effective January 1, 2025, the Supreme Court adopted new Guidelines for Guardians ad Litem in Civil Family Law Cases. The creation of these guidelines was one of the recommendations made in the Innovation Committee's Family Law Taskforce 2021 report. The guidelines were developed over the course of several years, with public feedback, intensive research, and a unanimous vote in favor of their adoption by the Judicial Conference Board of Directors.

The new guidelines:

- describe persons qualified to serve as a GAL
- require criminal background checks and child abuse/neglect checks
- outline the duties of a GAL, including mandatory in-person contact with children, a thorough and independent investigation, a definition of what best-interest advocacy encompasses, and guidance on sharing a child's expressed wishes to the court
- define the content of a GAL report
- clarify that the GAL role is to make recommendations to the court and, if necessary, monitor the case for a specified period of time
- require twelve hours of initial training on required topics and six hours of continuing training annually

In addition, in order to serve as a GAL in Indiana going forward, a person must be registered as a qualified Guardian ad Litem on the Supreme Court's GAL Registry. To be included in the registry, all GALs must complete an application, prove their qualifications and training, and pass the background checks. By the end of the fiscal year, 337 GALs appeared on the registry.



337

GALs on the registry of
Guardians ad Litem



438

Applications received for
the GAL registry

Children & Families



802

families in 12 counties
benefited from family
court projects



1,117

adults in 52 counties
served by guardianship
programs



2,812*

total CASA
volunteers in Indiana



19,602*

children received
CASA advocacy



554*

new CASA
volunteers trained



87

counties with certified
GAL/CASA programs



Pictured above. Representative Victoria Garcia Wilburn presents House Concurrent Resolution 34 to the State Office of GAL/CASA recognizing the important work of Guardians ad Litem and Court Appointed Special Advocate professionals and volunteers in giving a voice to abused and neglected children.

* calendar year 2024

Expedited Appeals for Involuntary Commitments

USING AI TRANSCRIPTS

A person ordered to an involuntary temporary mental health commitment in Indiana can be left without meaningful appellate relief. Indiana Code section 12-26-6-1 states that an individual alleged to be mentally ill and either dangerous or gravely disabled may be committed for not more than 90 days. The standard appellate timeline is approximately 150 days after which the Court of Appeals starts drafting an opinion.

Following a recommendation from members of the Committee on Rules of Practice and Procedure, the Chief Justice directed a group of stakeholders to convene to address this issue. Stakeholders included representatives from counsel for mental health care providers, appellate courts, Marion County courts, the Marion County Public Defender Agency, and the Office of the Indiana Attorney General.



4,200
words per brief
instead of 14,000



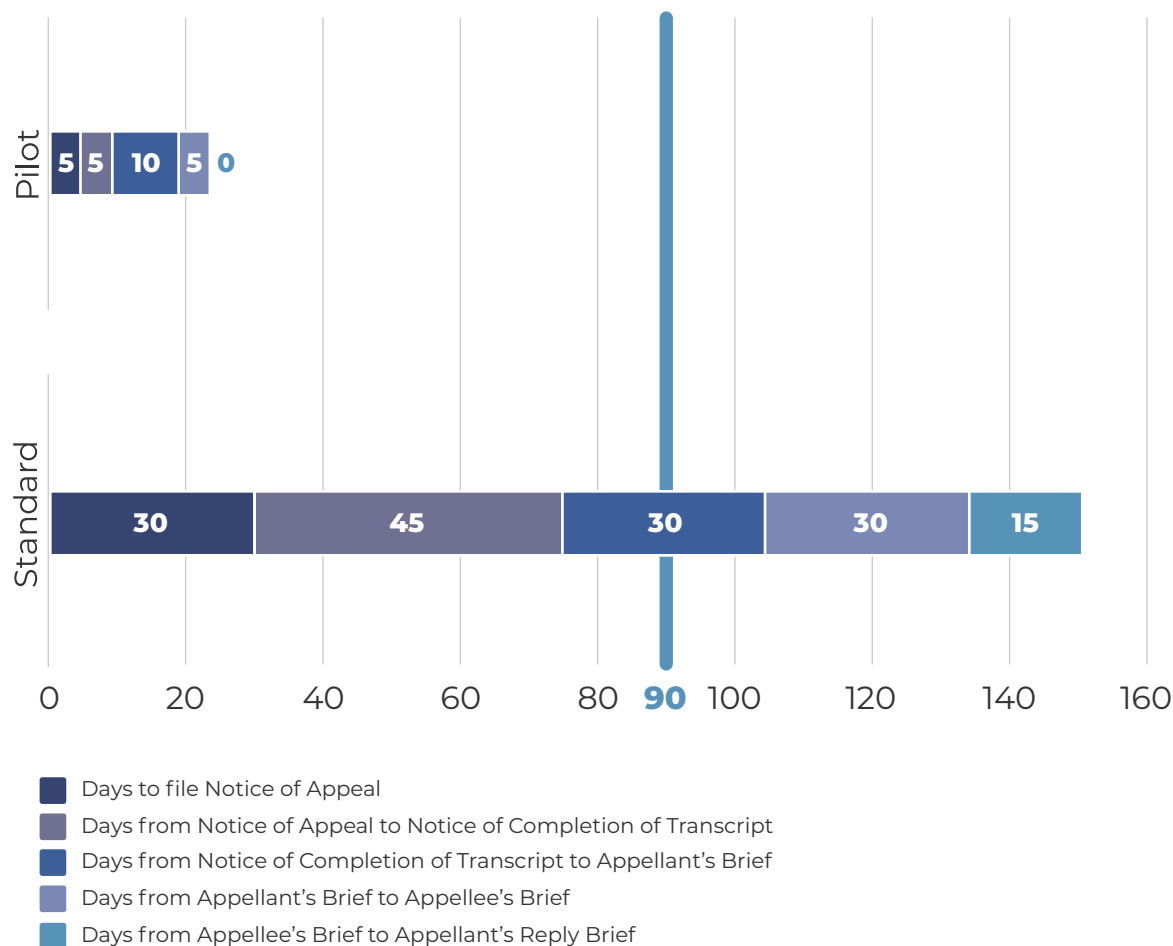
25
day briefing period
instead of 150

The group came to an agreement on the parameters of the proposal, including shortened:

- **Briefs** – 4,200 words instead of 14,000 words
- **Briefing periods** – 25 days instead of 150 days

The group agreed that the major obstacle to resolving these types of appeals on the merits are the transcripts, as many court reporters indicate that their standard 45-day timeline is already difficult to meet. To devise a solution, project leaders worked closely with the Marion County court technology team.

The team found they could generate transcripts for use on appeal within minutes after an initial hearing by utilizing a third-party system already in use coupled with an added AI-powered natural language voice to text generator. The AI library is both closed—all the data is kept confidential and not fed into the larger public



BRIEFING TIMELINE COMPARISON

Comparing the 25-day briefing period of the pilot to the standard 150-day briefing, also showing the 90-day limit on an involuntary commitment

AI model—and enhanced with medical and legal resources pertinent to mental health case types.

After robust testing, the Supreme Court authorized a two-year pilot project, which began September 1, 2024. In the first six months, seven expedited cases were initiated, during which the average time from the notice of appeal to the Court of Appeals opinion was about 31 calendar days. For comparison, 2023 mental health appeals from Marion County averaged 143 days from notice of appeal to opinion or dismissal. Further, the average time for a Court of Appeals opinion to be issued after the case was fully briefed was about 8 calendar days. Likewise, of the seven initial cases, three included petitions to transfer, which the Supreme Court decided within 3 calendar days after the response to transfer was filed.

In May 2025, the Supreme Court provided additional clarity regarding appellate relief for commitment orders that have expired prior to an appellate opinion being issued. See the summary of *J.F. v. St. Vincent Hospital and Health Care Center* on page 65.

STRATEGIC Data Modernization

After decades of work to modernize courts, the judicial branch is teeming with data. But is it the right data? Are there any gaps? Is it in the right form? Can the people who need it access it? To answer these questions and guide data projects, the Office of Innovation has initiated a plan for strategic data modernization.

The plan involves a two-sided approach to establish processes and best practices for both data governance and data management as well as centralizing and standardizing data from across the organization into an enterprise data warehouse. A standing committee for data governance will focus on establishing policies and procedures, while staff involved in data management will follow those policies and procedures.

The data governance committee, staffed by the new Director of Data Governance and Analytics, convened a number of work groups during the fiscal year to make

recommendations regarding the capture, storage, transformation, cleaning, validation, documentation, publication, access, sharing, archiving, ingestion, destruction, analysis, and backup of data.

For example, in a project to create an online dashboard for access to data regarding court cases with self-represented litigants, developers need guidance on things like where the data will be stored, how often it should be updated, and whether or not users of the dashboard can export the data.

In order for court data to be useful to policymakers and the public, it must be refined, defined, and designed to be easy to consume and comprehend. The work product of the strategic data modernization project will enable public data to be shared the right way.

Data governance vs. Data management



Data governance

Do the right things

Create the rules of the game

Oversight



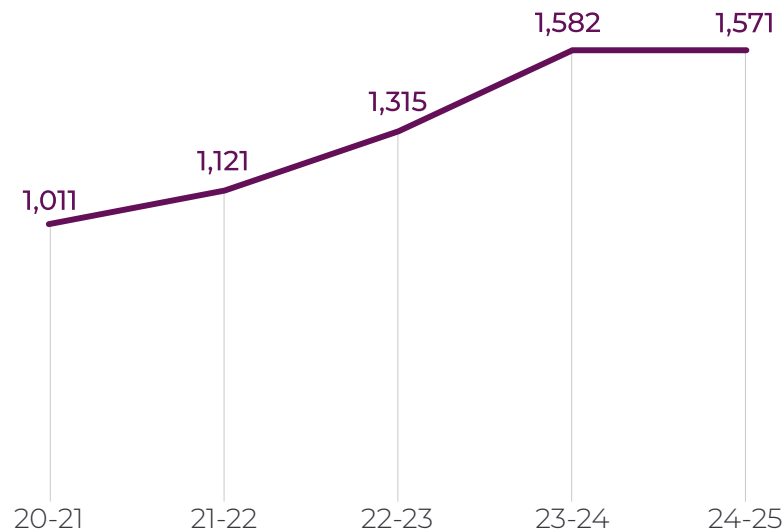
Data management

Do the things right

Play the game by the rules

Execution

Public Access & Transparency



PUBLIC RECORDS REQUESTS

Total number of requests for public records received



2.4 M

times attorneys signed
into mycase



81 M

page views
at mycase.in.gov



317 K

remote hearing participants
in trial courts



14 K

hours of trial court remote
hearings streamed

COMMUNICATION OFFICE ANSWERED



134

judge questions



322

media questions



182

public questions



446

library reference questions

Improving Public Safety

WITH STATEWIDE JAIL MANAGEMENT

Over the past two decades, Indiana courts, prosecutors, public defenders, and supervision agencies have transitioned to statewide systems that share and exchange critical data. These systems have improved efficiency and transparency in the justice system, but we are still missing a critical component: statewide jail data.

In 2019, the Indiana General Assembly established a Jail Overcrowding Task Force to review the issue of, and potential solutions for, the overpopulation of inmates in our jails statewide. In their report, the task force recommended that “all jails should be required to provide clearly defined, specific, real time data relevant to the jail population” so that in the future, criminal justice stakeholders can use that data “as a component for measuring recidivism and conducting research and evaluation on key performance measures and program outcomes.” The task force even recommended that jail data should interface with existing state systems, including the statewide case management system.

A jail system is critical for many reasons. In addition to having the ability to safely house and manage sometimes hundreds of inmates in a facility, the jails play an important role in ensuring the criminal history records maintained by state police are accurate and complete. Such a system is in development by the



33

Counties with INjail or
in line to implement it

**“...we’re creating a
single integrated
system that
will collect and
report accurate
statewide jail
population data...”**

—Chief Justice Loretta Rush

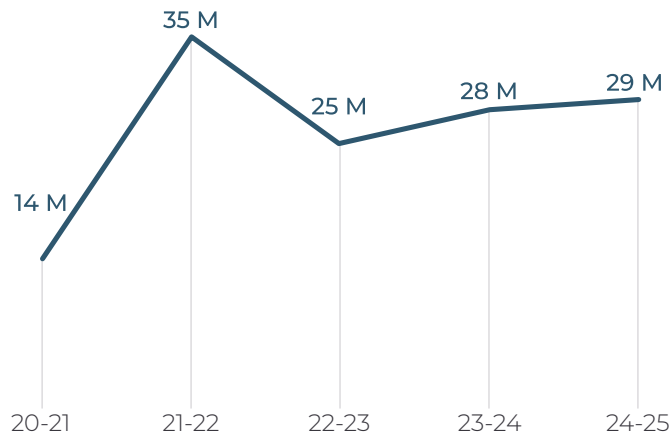
Indiana Office of Court Technology and, as of the end of the fiscal year, is live in 6 counties: Elkhart, Grant, Hendricks, Martin, Putnam, and Warren. An additional 27 counties have expressed interest in the new system or signed up to implement it.

Chief Justice Rush told lawmakers in her 2025 State of the Judiciary address:

“There are 20 different jail management software systems throughout Indiana. So we’re creating a single integrated system that will collect and report accurate statewide jail population data, share fingerprints, streamline and connect justice system operations.”

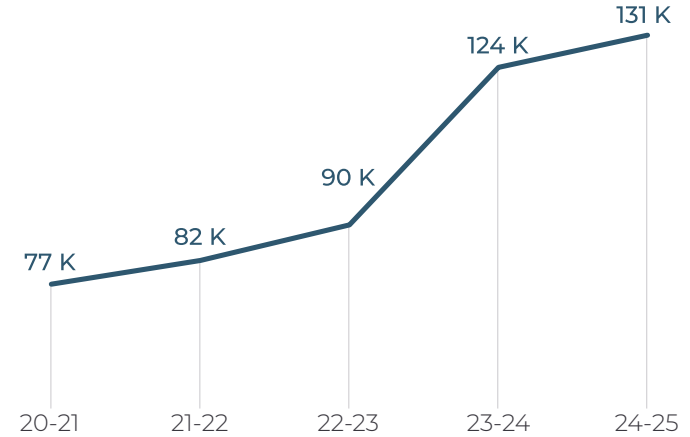
This potentially statewide jail management system, dubbed INjail, connects local jails and jail data to systems used by courts, prosecutors, defense attorneys, probation departments, state police, the Indiana Department of Correction, the U.S. Department of Veterans Affairs, and more. INjail bridges the gaps between arrest, prosecution, conviction, sentencing, and supervision; tracks offenders; and provides real-time jail data to policymakers at local, state, and federal levels.

Case Management & Technology



DOWNLOADS FROM MYCASE.IN.GOV

Number of documents downloaded, 5-year trend



TRAFFIC TICKETS PAID ONLINE

Number of people who paid online, 5-year trend



9.2 M

documents e-filed
statewide



131 K

people paid
traffic tickets online



22 K

people paid
criminal fees online



15 K

protection order cases
e-filed statewide



402 K

tax warrants
processed



\$800 K

unpaid court fees recovered
from tax refunds



62 K

help desk
tickets resolved



204 K

criminal cases
e-filed into Odyssey



193 K

adult & juvenile risk
assessments completed



46 K

marriage licenses
issued

Language Access



179

certified and qualified
interpreters in 19 languages

American Sign Language

Amharic

Arabic

Bosnian Serbian Croatian

Burmese

Cantonese

French

Gujarati

Haitian Creole

Hindi

Mandarin

Polish

Portuguese

Punjabi

Romanian

Russian

Spanish

Tongan

Vietnamese



CALLS TO LANGUAGE LINE

Top 5 languages for which Language Line
provided service during the year:

1. Spanish
2. Burmese
3. Haitian Creole
4. Punjabi
5. American Sign Language



78 K

hearings required court
interpreter services



147 K

minutes of interpreter
service provided by
Language Line



15 minutes

average duration of audio
calls to Language Line

Special Courts & Programs

OJA works with probation, problem-solving courts, court alcohol and drug programs, and juvenile justice stakeholders to help criminal offenders successfully transition into the community and to offer community-based alternative programs for youth.

CERTIFIED OR IN PLANNING



162

problem-solving courts



31

veterans treatment courts



23

family recovery courts



44

pretrial service agencies



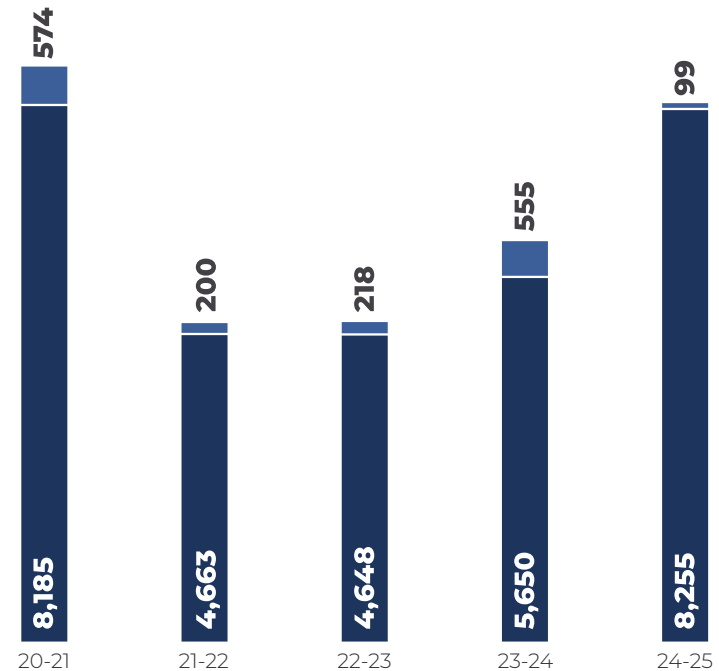
47

certified court alcohol
and drug programs



35*

counties implementing
juvenile detention
alternatives



PROBATION CASES

Adult and juvenile probation cases managed
by interstate compact staff

* calendar year 2024

PRIORITIZING Behavioral Health

Judges say one of the biggest challenges they face is the large volume of litigants that come before them with behavioral health needs. In an effort to address the issue, the Court established the Office of Behavioral Health headed by Indiana's first State Court Behavioral Health Administrator. The office is working to provide courts with best practices and connections to appropriate resources.

During the fiscal year—the office's first year of operation—office leadership established a strong foundation for achieving its mission of helping judges and court staff recognize and respond appropriately to mental health, substance use, and co-occurring conditions in the courts. In addition to developing a comprehensive strategic plan that incorporates an ongoing vision beyond this first year, the office:

- convened and supported a behavioral health committee of 15 judicial officers and 4 working groups
- was awarded a State Justice Institute grant to support the committee in authoring an Indiana-specific behavioral health plan for the judiciary

- consulted in real time with judicial officers on matters including competency, civil commitment, connecting with a community provider, de-escalation techniques, and youth behavioral health
- established strong relationships with a wide range of entities at the state and national level in the fields of mental health and addiction
- joined a number of task forces supported by state agencies and nonprofits working to address behavioral health
- provided education to judges, attorneys, court staff, and external partners at events with 3,300 people in attendance

Going forward, the office will work with the behavioral health committee to author and disseminate its statewide behavioral health plan, continue its strong working relationships with key partners, and serve as a resource—through education, technical assistance, and advice—to judicial officers and justice system professionals on matters related to behavioral health.



33

presentations to judges, attorneys, court staff, and other partners



97

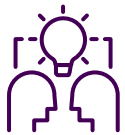
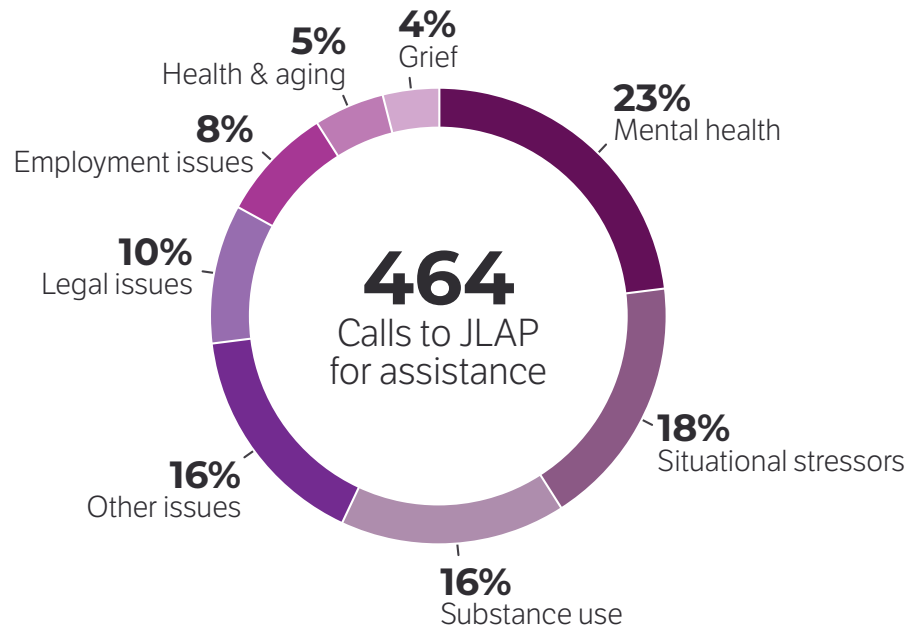
consultations with judges



219

external stakeholder meetings

Well-being



10
monthly support
groups



120
peer group
sessions



101
presentations
given to audiences
totaling 5,200

Pictured at right. Justice Molter takes a walk with Supreme Court staff around the government center campus. The Court hosts several walks per year, weather permitting, to remind staff to rise up from their desks and move for their health and well-being.





Clockwise from top left: "Puppy Love" event, hosted by the Court's Well-being Committee, in which court staff had an opportunity to interact with JLAP therapy dogs; a day of service at the Indianapolis Zoo during Public Service Recognition Week, where court staff made interactive toys for zoo animals; well-being walk, in which staff took a stroll along the Indianapolis downtown canal with Justice Slaughter.



Grants

OJA is responsible for distributing grants to local courts to aid in funding a variety of programs and specialty courts. Grants are available to cover the cost of court interpreter services, to assist in the development of pretrial services agencies, and to improve court technology and facilities.

For example, during the fiscal year, court improvement program grants helped fund county projects like:

- Providing permanency mediations and other types of facilitations for child welfare cases experiencing delays
- Piloting “Upstream” projects, which are collaborative efforts with community stakeholders to identify and address the individualized resource needs of families involved in the child welfare system

Grant Program	Award
Adult guardianship (VASIA) matching	\$1,357,000.00
Alcohol and drug program	\$1,700.27
Commercial courts	\$434,336.20
Court improvement programs	\$82,864.05
Court interpreters	\$664,340.35
Court reform	\$226,967.87
Educational scholarships	\$22,434.41
Family courts	\$274,946.88
GAL/CASA	\$5,131,492.50
John R. Justice (law school debt)	\$36,460.79
Pretrial services agencies	\$3,824,554.00
Problem-solving courts	\$6,717,127.00
State opioid response	\$3,028,700.25
Total	\$21,802,924.57

Case Work of the Indiana Supreme Court

The Indiana Supreme Court's 50 opinions in the fiscal year included issues of first impression on class certification, medical malpractice, self-defense, and strict liability; others required the Court to apply the eggshell skull doctrine, the firefighter's rule, and the traffic flow rule. The opinions spanned additional questions of federal and Indiana constitutional law; contract, commercial, and insurance matters; juvenile topics; utility law issues; and procedural questions. The following digests much of the year's caseload.

Exclusive Jurisdiction Cases

Capital Post-Conviction Relief

After the Court set an execution date for Joseph Corcoran, who was convicted in 1999 of murdering four people, Corcoran's counsel filed two motions for permission to file successive petitions for post-conviction relief and sought to stay the execution. In *Corcoran v. State*, 246 N.E.3d 782 (Ind. 2024), the Court denied the petitions and the motions to stay, finding no reasonable possibility that Corcoran was entitled to relief.

After the State moved to set an execution date for Benjamin Ritchie, who was convicted in 2002 for murdering a police officer, Ritchie sought permission to file a successive petition for post-conviction relief. In *Ritchie v. State*, No. 24S-SD-342 (Ind. 2025) (published order), an evenly divided Court (with Justice Massa not participating) denied Ritchie's request and granted the State's motion to set an execution date.

Life Without Parole

A jury found Mathew Cramer guilty of murdering and dismembering Shane Nguyen and recommended a sentence of life imprisonment without parole, which the trial court imposed. On direct appeal, the

Court affirmed in *Cramer v. State*, 240 N.E.3d 693 (Ind. 2024), finding the sentence was not inappropriate in light of the nature of the offenses and Cramer's character. As a result, the revision of his sentence under Appellate Rule 7(B) was not warranted.

In *Crossland v. State*, 256 N.E.3d 517 (Ind. 2025), a jury convicted Chelsea Crossland of murder and neglect of a dependent and sentenced her to life without parole for the death of her five-year-old son. The Court affirmed, finding Crossland was not denied the right to an impartial jury or the right to present a complete defense.

Original Actions

Under Trial Rule 53.1, the Court—through its Chief Administrative Officer—may order a case withdrawn from a trial judge for failure to timely rule on a motion. Any challenges to a Trial Rule 53.1 determination are appropriately litigated through the original action process. In *State ex rel. Thoe v. Marion Superior Court*, 260 N.E.3d 882 (Ind. 2025) (per curiam), the Court (with Chief Justice Rush not participating) appointed a special judge in the underlying proceedings, finding that the trial judge had failed to timely rule on several motions and the CAO should have withdrawn the case.

Civil Transfer Cases

Agency Actions

In *Ind. Law Enforcement Training Board v. R.L.*, 246 N.E.3d 257 (Ind. 2024), the Court reversed the trial court’s judgment that R.L. could not be disciplined by the Law Enforcement Training Board after his criminal charges for driving while intoxicated had been dropped. The Court held that the only route by which R.L. could challenge the board’s decision was through the Administrative Orders and Procedures Act, and his failure to exhaust administrative remedies left the trial court with no final agency action to review.

Appellate Practice and Procedure

The Court resolved a split in the Court of Appeals’ treatment of temporary involuntary civil commitment orders in *J.F. v. St. Vincent Hospital and Health Care Center*, 256 N.E.3d 1260 (Ind. 2025). The Court held that the appeal of a temporary commitment order is not moot—even if the commitment has expired—unless the appellee shows that there are no collateral consequences from the commitment.

In *Mayberry v. American Acceptance Co.*, 242 N.E.3d 1053 (Ind. 2024), the Court of Appeals dismissed Mayberry’s appeal for his failure to timely seek an order compelling the trial clerk

to file a Notice of Completion of Clerk’s Record. Holding that Appellate Rule 10(F) should only lead to dismissal when the appellant does not act in good faith, the rule violation is egregious, or the appellee is prejudiced, the Court vacated the dismissal of Mayberry’s appeal and remanded the case to the Court of Appeals.

Certified Questions

The Court accepted a certified question from the Second Circuit Court of Appeals in *Loomis v. ACE American Ins. Co.*, 244 N.E.3d 908 (Ind. 2024) to address the interpretation of an Indiana insurance statute. The Court held that a policy providing automobile liability insurance in excess of a retained limit is not a “commercial excess liability policy” under Indiana Code section 27-7-5-2(d). In a matter of first impression, the Court analyzed the phrase, “limits of liability,” holding that an insurer is statutorily obligated to provide underinsured motorist coverage—regardless of an imposition of a retained limit as a condition precedent—because the phrase under Indiana law is ambiguous and thus must be construed in favor of the insured.

In *Diamond Quality, Inc. v. Dana Light Axle Products, LLC*, 256 N.E.3d 529 (Ind. 2025), the Court answered a certified question from the U.S. District Court for the Northern District of Indiana: Does a property owner act without justification (or engage in wrongful or illegal conduct) for purposes of a claim for tortious

interference with a contractual or business relationship, when the property owner bars a plaintiff from accessing the owner’s property? The Court answered “no,” holding that absent a contractual or statutory duty, a property owner is always justified in excluding another from the owner’s premises.

Child in Need of Services

The Court provided a statutory roadmap for CHINS proceedings in *Matter of E.K.*, 260 N.E.3d 901 (Ind. 2025). In addressing the key differences between proceedings under CHINS 1 (neglect), CHINS 6 (endangerment), and CHINS 10 (fetal alcohol syndrome), the Court also clarified that trial courts may consider and adjudicate children CHINS under categories not pleaded by DCS when doing so advances the child’s best interests and does not prejudice the child’s rights. And the Court held that, for CHINS 1, DCS must prove that a parent either had the financial means or failed to seek other reasonable means to provide a child with necessary shelter, which includes not just housing, but a safe, secure, and stable environment. Because DCS failed to meet this burden, the Court reversed the CHINS 1 adjudication and remanded for further proceedings.

Civil Commitments

In *J.W. v. Community Fairbanks Behavioral Health*, 260 N.E.3d 946 (Ind. 2025) (per curiam), the Court affirmed J.W.’s temporary involuntary civil commitment. In doing so, it noted that outpatient treatment is a viable option during such commitments when it is likely to be a safe and beneficial alternative to inpatient treatment.

Contracts and Commercial Law

In *Perdue Farms, Inc. v. L&B Transport, LLC*, 239 N.E.3d 842 (Ind. 2024), the Court decided whether to enforce a forum-selection clause that would require an Indiana dispute between commercial parties to be heard in a Maryland federal court. The Court enforced the forum-selection clause as to the contracting parties, requiring some of Perdue’s claims to be heard in Maryland. But it declined to apply the forum-selection clause to Perdue’s claims against individual employees, who were not parties to the contract containing the clause, so their claims would continue to be heard in Indiana.

The Court addressed the priority, validity, and scope of construction liens in *EdgeRock Development, LLC v. C.H. Garmong & Son Inc.*, 261 N.E.3d 192 (Ind. 2025). The Court concluded that a construction lien secures only the debt for improvements directly benefiting the property to which the lien attaches, so

contractors could foreclose the liens on each property to recover only those amounts, not amounts for work to improve a different owner’s property. The Court also held that First Bank’s mortgage lien was senior to the construction liens for the amount First Bank loaned to satisfy Garmong’s prior construction lien, but junior as to the remaining amounts.

In *Thomas v. Valpo Motors, Inc.*, 258 N.E.3d 236 (Ind. 2025), the Court held that a used car dealer’s “buyers guide” was too ambiguous to effectively disclaim the implied warranty of merchantability. Accordingly, the Court reversed the trial court’s summary judgment order in the dealer’s favor and remanded for calculation of the buyer’s attorney’s fees, should the buyer prevail in showing that the dealer had a reasonable opportunity to cure its failure to comply with its implied-warranty obligation under the Federal Magnuson-Moss Warranty Act.

Election Law

The Court dismissed an election appeal as moot in *Thomas v. Foyst*, 260 N.E.3d 887 (Ind. 2025). This case addressed the two avenues for election disputes: (1) a pre-election candidacy challenge to determine who can be on the ballot; and (2) a post-election contest to determine who should be declared the winner. The Court held that because the challenger pursued only the candidacy challenge, he could not later contest the election results.

Estates

The Court addressed the appropriate standard to be applied when creating a constructive trust in *Geels v. Flottemesch*, 243 N.E.3d 1069 (Ind. 2024) (per curiam). There, the trial court created a constructive trust over life insurance proceeds after finding it “more likely than not” that the decedent intended the proceeds to go to his daughters. The Court reversed and remanded, holding that the evidence must instead be analyzed under the clear-and-convincing standard.

Employment Matters

The Court addressed an exception to Indiana’s employment-at-will doctrine—that an employer may not fire an employee for pursuing a statutory right—in *South Bend Community School Corporation v. Grabowski*, 261 N.E.3d 222 (Ind. 2025). Finding no evidence that the school corporation discharged its employee solely to avoid workers’ compensation liability, the Court reversed the jury’s verdict in the employee’s favor and remanded with instructions to enter judgment for the school corporation.

Family Law

In *J.D. v. R.W.*, 248 N.E.3d 574 (Ind. 2025), the Court held for the first time that trial courts may consider a petitioner’s advanced age when determining whether to grant an adoption, but

clarified that age should be considered in light of ability. The Court also held that the trial court erred by finding it was “inherently” in the child’s best interest to be raised by a biological parent and remanded with instructions to reconsider the grandparents’ adoption petition.

The Court reviewed a property settlement agreement in *Wohlt v. Wohlt*, 245 N.E.3d 611 (Ind. 2024), where both spouses had forgotten that a company the husband was awarded in the divorce still owned some cryptocurrency assets. The Court ultimately concluded that the agreement unambiguously divided all the couple’s assets—forgotten and remembered—and presented no claims of mutual mistake or fraud, so the wife was not entitled to any of the cryptocurrency’s present value.

Jurisdiction

In *Tingley v. First Financial Bank*, 252 N.E.3d 428 (Ind. 2025), an Indiana trust beneficiary sued an Indiana bank in an Indiana trial court over whether and how to dispose of trust property. The trial court dismissed the case for lack of subject-matter jurisdiction, noting that the trust held Illinois real estate, was governed by Illinois law, and included mostly Illinois beneficiaries. But the Court reversed, holding that the trial court had jurisdiction to adjudicate the matter.

Juvenile Delinquency

The Court addressed the juvenile waiver statute in *J.Q.R. v. State*, 252 N.E.3d 919 (Ind. 2025). J.Q.R. was adjudicated a delinquent after his father—who, like J.Q.R., was suspected of having engaged in illegal drug activity—twice waived J.Q.R.’s rights. The Court held that an adverse interest may arise under the juvenile waiver statute if an adult stands to personally benefit from waiving a child’s rights to the child’s detriment.

In *State v. B.H.*, 260 N.E.3d 953 (Ind. 2025), the Court dismissed the State’s appeal, declining to decide whether the State could appeal an order denying approval of its juvenile delinquency petition. The Court determined that even if the order was appealable, the State forfeited its right to appeal by filing an untimely notice and failing to offer any extraordinarily compelling reasons to reinstate that right.

Medical Malpractice

In *Indiana Department of Insurance v. Doe*, 247 N.E.3d 1204 (Ind. 2024), the Court affirmed the denial of summary judgment in the providers’ favor and resolved three issues of first impression under the Medical Malpractice Act. The Court first held that the Patient’s Compensation Fund may challenge whether a claim falls under the Act after a plaintiff settles with a provider. It then held that a negligent credentialing claim falls within the Act only if

the credentialed physician commits an act of medical malpractice. And finally, it held that claims premised on sexual assault by a physician during an exam can fall within the Act if the misconduct stems from an inseparable part of the health care being rendered.

While a medical malpractice complaint is pending before a review panel, the claimant may seek preliminary determination of certain threshold issues. In *Gierek v. Anonymous 1*, 250 N.E.3d 378 (Ind. 2025), the Court held for the first time that a trial court’s class certification is a preliminary determination under the Medical Malpractice Act. The Court also held that the Act covers all medical “malpractice” claims, as the Act defines that term, and is not limited to those only involving physical bodily injury or death.

Negligence

The Court clarified the limitations of the firefighter’s rule in *Dolsen Jr. v. VeoRide*, 235 N.E.3d 1258 (Ind. 2024). This rule requires landowners to warn firefighters of any latent dangers on the premises and to refrain from willful or wanton acts that put firefighters at risk. Dolsen was injured after he fell through a large opening in a wall while extinguishing a fire in VeoRide’s building. The Court reversed the trial court’s grant of summary judgment in VeoRide’s favor, finding disputed factual issues as to whether VeoRide breached its duty to Dolsen.

In *Cave Quarries, Inc. v. Warex, LLC*, 240 N.E.3d 681 (Ind. 2024), the Court answered a question of first impression: Is a blasting company strictly liable for damages it causes to its blasting customer, or is it instead liable only for negligence? Maintaining the bright-line rule that a party is strictly liable only for damage its blasting causes to neighbors and bystanders, the Court held that the negligence standard is appropriate in claims brought by customers.

The Court addressed the doctrine of *res ipsa loquitur*, or “the thing speaks for itself,” in *Isgrig v. Trustees of Indiana University*, 256 N.E.3d 1238 (Ind. 2025). After a window fell onto an Indiana University student while she was studying for finals, the student sued IU for negligence. The Court reversed the trial court’s grant of summary judgment to IU, holding that *res ipsa* may be applied to premises liability cases involving fixtures, like a window, when an invitee is injured on a landowner’s premises.

Property Matters

In *State v. Franciscan Alliance*, 245 N.E.3d 144 (Ind. 2024), the Court reaffirmed the long-established “traffic flow” rule: When a road improvement project leaves a property’s access points unchanged, a landowner cannot recover damages from changes in traffic flow between their property and a public road. Because the State’s construction project did not affect the properties’ access points,

damages from the intersection closure were not compensable. Thus, the Court reversed the jury verdict in the property owners’ favor.

The Court vacated a public-nuisance injunction in *Willow Haven on 106th St. LLC v. Nagireddy*, 252 N.E.3d 418 (Ind. 2025). The property owners sought a declaration that Willow Haven’s proposed use of its property—to house up to ten residents with dementia—violated Carmel’s unified development ordinance. Holding that the property owners failed to show they were likely to succeed on the merits of their public-nuisance claim, the Court vacated the injunction and remanded for further proceedings.

Statutory Interpretation

In *Finnegan v. State*, 240 N.E.3d 1265 (Ind. 2024), the Court affirmed the trial court’s denial of Finnegan’s request for a mental health evaluation in his contempt matter. The Court held that the statutory procedures for asserting the insanity defense in criminal proceedings do not apply in an indirect criminal contempt action because it is not a “criminal case” as used in Indiana Code section 35-36-2-2(b).

Under Indiana’s Sex Offender Registration Act, a “sex or violent offender” includes a person “required to register as a sex or violent offender in any jurisdiction.” A person who resides in

Indiana and meets that definition must register for the period required by the other jurisdiction or the period prescribed by Indiana statute, whichever is longer. In *Peters v. Quakenbush*, 260 N.E.3d 919 (Ind. 2025), the Court held that this provision applies even if the person did not commit their offense in the jurisdiction that required a longer registration period; but because Peters was no longer required to register in another jurisdiction, summary judgment in his favor was appropriate.

By statute, a religious organization must only (1) warn invitees of hidden dangers of which it has actual knowledge and (2) not intentionally harm invitees. Kirsch sued a church for injuries he sustained while building a shed near the church’s parking lot, arguing the statute did not apply because he was not injured on church “premises.” In *Calvary Temple Church of Evansville, Inc. v. Kirsch*, 251 N.E.3d 1056 (Ind. 2025), the Court remanded to enter summary judgment for the church, finding that “premises” includes the whole parcel of land that is owned, operated, or controlled by the church and used primarily for worship services.

The Court addressed what it means to “substantially prevail” under Indiana’s Access to Public Records Act (APRA) in *Nardi v. King*, 253 N.E.3d 1098 (Ind. 2025). The trial court ordered the Indiana Election Division to produce one of three documents Nardi requested; because

Nardi “substantially prevailed” as to one-third of his request, the trial court awarded him one-third of the fee he asked for. The Court agreed that Nardi substantially prevailed under APRA after he successfully obtained a wrongfully withheld public record, but remanded for recalculation of the fee award based on whether the time spent on Nardi’s unsuccessful claims was indivisible from the time spent on the successful claim.

The Court also addressed APRA in *Family & Social Services Administration v. Saint*, 258 N.E.3d 972 (Ind. 2025). Saint requested a legal memo created by a private entity and given to the Family & Social Services Administration for use in Medicaid settlement negotiations. The Court first defined the term “intra-agency material” as material generated and communicated between employees of the same agency. As a result, the Court found that the memo was not “intra-agency material” that could be withheld and affirmed the trial court’s order to disclose the document.

While the General Assembly often enacts statutes imposing duties on governmental entities, the Court recognizes a person’s right to sue these entities only when a statute was intended to create a private right of action. In *Kelly v. Indiana Bureau of Motor Vehicles*, 260 N.E.3d 934 (Ind. 2025), the Court declined to infer that the Legislature intended to give drivers the right to sue the BMV when damages allegedly result from the agency’s inaccurate

recordkeeping. The Court also concluded the driver failed to establish he suffered an injury actionable under the common law. Accordingly, the Court affirmed the dismissal of his complaint.

Trial Practice and Procedure

Indiana’s discovery rules are designed to strike a balance between promoting the exchange of relevant information and preventing overreach. In *Jennings v. Smiley*, 249 N.E.3d 1071 (Ind. 2025), the Court held as a matter of first impression that a party seeking production of a smartphone must (1) provide some evidence the device was being used at a time when it could have been a cause of the litigated incident and (2) describe the data sought with reasonable particularity. Because Jennings’ discovery request lacked the necessary evidentiary support and was overly broad, the Court found no abuse of discretion and affirmed the denial of his motion to compel.

Another discovery dispute was decided in *AMW Investments Inc. v. Town of Clarksville*, 246 N.E.3d 1213 (Ind. 2024). The trial court sanctioned AMW \$30,000 for refusing to respond to the Town’s discovery requests. The Court affirmed the sanction and discovery order and remanded, holding that AMW was entitled to challenge the underlying discovery order in its appeal of the sanction order but had waived its discovery objections.

The Court tackled jury instructions and evidentiary issues in *Abbas, M.D. v. Neter-Nu*, 261 N.E.3d 233 (Ind. 2025). In this medical malpractice case, the Court affirmed the jury verdict in a patient’s favor but remanded with instructions to grant the hospital’s Trial Rule 50(A) motion for partial judgment on the evidence and recalculate prejudgment interest. The Court determined that the trial court erred by instructing the jury that it could find the hospital liable for the patient’s injuries independent of its vicarious liability for the other named defendants, finding insufficient evidence to support the instruction.

In *Automotive Finance Corp. v. Liu*, 250 N.E.3d 406 (Ind. 2025), the Court clarified the limits of Trial Rule 60(B), which allows courts to set aside judgments under certain circumstances. The trial court entered summary judgment against Liu for an unpaid business debt but later set that order aside based on fraud under Trial Rule 60(B)(3). The Court reversed, holding that the trial court could not grant Liu relief on grounds she could have raised—but did not—in a motion to correct error.

Utility Law

The Court interpreted the transmission, distribution, and storage improvement (TDSIC) statute in *Ind. Office of Utility Consumer Counselor v. Duke Energy Indiana LLC*, 248 N.E.3d 1205 (Ind. 2024). It held that the cost-justification provision of this statute requires

all improvements—not each improvement—to be cost-justified. The Court also held that the scope of commission authority to approve a TDSIC plan is a question of law that does not require agency deference and ultimately affirmed the Indiana Utility Regulatory Commission.

Criminal Transfer Cases

Jurisdiction

In *J.B. v. State*, 252 N.E.3d 910 (Ind. 2025), the Court further clarified the scope of the jurisdictional gap that once prevented the prosecution of someone who allegedly committed child molesting as a minor but was not waived into adult court before age 21. The General Assembly amended the statutes to close the gap in 2023, but because J.B. had been convicted before then and the amendments do not apply retroactively, the Court reversed the conviction and remanded with instructions to dismiss the case for lack of subject matter jurisdiction.

Post-Conviction Relief

In *Kelly v. State*, 257 N.E.3d 782 (Ind. 2025), the Court held that the Post-Conviction Rules require appellate screening before *filing* a successive petition, but not before *amending*

a successive petition, so the post-conviction court’s decision to allow Kelly to amend his claims was appropriate. As to the substance—Kelly’s challenge to his 110-year sentence—the Court affirmed the sentence and noted that the Legislature recently amended the sentence modification statute to offer juvenile offenders like Kelly the right to have their sentences re-examined after twenty years.

Trial Practice and Procedure

The Court addressed the application of the “eggshell skull doctrine” in *Konkle v. State*, 253 N.E.3d 1068 (Ind. 2025). Konkle appealed his conviction for voluntary manslaughter, arguing that the State committed prosecutorial misconduct by invoking the eggshell skull doctrine in a “knowing” murder case. The Court first held that a failure to seek an admonishment or mistrial on prosecutorial misconduct claims does not waive the argument on appeal when a timely objection is overruled. The Court then affirmed the conviction, finding no prosecutorial misconduct as the State did not misstate the law on the eggshell skull doctrine; using the word “intentional” did not amount to reversible error; and sufficient evidence showed Konkle killed the victim “knowingly.” The Court also found the nature of Konkle’s offense and his character did not warrant a revision of his sentence under Appellate Rule 7(B).

The four interlocutory appeals in *Seabolt, Dillard, Tyson, and Robinson v. State*, 240 N.E.3d 1249 (Ind. 2024), asked whether a judge’s decision to recuse from a prior case disqualified the judge from presiding over other cases that present the same concerns leading to recusal. The Court held that the judge was required to recuse in these four cases because her decision to recuse in another related case—without changed circumstances—would lead an objective observer to reasonably question her impartiality.

In *Bradley v. State*, 248 N.E.3d 563 (Ind. 2024), the Court held that a trial court’s sua sponte order for a competency evaluation did not reset the Criminal Rule 4(B) speedy trial period. But because Bradley failed to properly notify the court of its scheduling error, the Court determined that he waived his right to discharge.

Self-Defense

In *Turner v. State*, 253 N.E.3d 516 (Ind. 2025), the Court answered a question of first impression in Indiana: Are defendants deprived of the benefit of hindsight when it reveals their conduct was necessary in self-defense, even though that necessity wasn’t fully apparent in the moment? Answering “no,” the Court vacated Turner’s conviction for battery by means of a deadly weapon.



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