



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun  
Governor

Clint Woods  
Commissioner

To: Katherine Noel  
Chair, Indiana State Ethics Commission

William Deane  
Ethics Director, Office of the Indiana Inspector General

From: James French  
Ethics Officer, Indiana Department of Environmental Management

Date: June 4, 2026

Re: Waiver of 42 IAC 1-15-1

**FILED**

**JUN 04 2026**

INDIANA STATE  
ETHICS COMMISSION

In accordance with 42 IAC 1-5-1(c), as the Indiana Department of Environmental Management's (IDEM's) Ethics Officer, I am filing this waiver of the application of the Gift Rule based on the following facts.

Mark Stoddard and Katya Drake are both employees of the State, working in IDEM's Compliance and Technical Assistance Program (CTAP) as Environmental Engineer and Senior Environmental Manager, respectively. CTAP provides confidential assistance to Indiana businesses to help bring them into compliance with IDEM regulations.

Stoddard and Drake were both gifted free registration by American Coatings Association (the ACA) to attend the 2026 American Coatings Association Show and Conference (the Conference), which occurred May 5-7, 2026. The address for the ACA is 901 New York Avenue NW, Suite 300 West, Washington DC 20001. The Conference brings industry professionals together to expand their knowledge of the latest technology trends for the coatings industry.

Specifically, both employees received free event registration - \$1020 total.

Though IDEM does not assert that it has a business relationship with the ACA, IDEM is nevertheless filing this waiver out of an abundance of caution to avoid any appearance of impropriety.

This waiver of the Gift Rule is consistent with the public interest because Stoddard's and Drake's attendance supports the agency's mission by enabling the Stoddard and Drake to learn, network, and gather current technical, regulatory, and sustainability information relevant to Indiana's coatings manufacturers and suppliers. The Conference highlights environmental education, pollution prevention, and sustainability, aligning directly with CTAP's role in providing confidential compliance assistance and supporting proactive environmental performance among small businesses. With budget cuts, it would not be possible for CTAP staff to attend an event such as this.

James French  
Ethics Officer  
Indiana Department of Environmental Management