



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N758  
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

**Mike Braun, Governor**  
**Lyndsay Quist, Commissioner**

**FILED**

February 26, 2026

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

**FEB 26 2026**

INDIANA STATE  
ETHICS COMMISSION

Re: Waiver of Application of 42 IAC 1-5-1 (the "Gift Rule") for Certain Items of Value Received by INDOT Employees in Relation to the Traffic Control Corporation's (TCC) 2026 Cabinet Trouble Shooting & TS2 Review, held at the Crown Plaza Indianapolis – Airport, 2501 High School Road, Indianapolis, Indiana 46241 on February 18, 2026 from 9 AM to 2 PM EST.

Chairwoman Noel:

Commissioner Lyndsay Quist, the appointing authority to the Indiana State Department of Transportation, ("INDOT"), has designated authority to me as the agency's ethics officer to waive application of the Gift Rule in individual cases when consistent with the public interest. I am hereby waiving application of 42 IAC 1-5-1 (a) for items of value that will be received by INDOT Traffic Highway Engineer Supervisor, Prakash Patel, Highway Engineer 2, Shahpor Shahbahrami, Highway Engineer 2, Ankur Desai, and Highway Engineer 2, Ivan Anwar Syed, so that they may accept an Invite to attend the Traffic Control Corporation's 2026 Cabinet Trouble Shooting & TS2 Review ("ATSSA"), which was held on February 18, 2026 at the Crown Plaza Hotel Indianapolis - Airport. Said employees benefited professionally from attendance for the reasons provided below.

The Cabinet Trouble Shooting & TS2 Review was held at the Crown Plaza Indianapolis – Airport, 2501 High School Road, Indianapolis, Indiana 46241. Lunch was provided to all attendees, but no other benefits were given to the INDOT employees by the TCC. The employees estimated lunch costs approximately fifteen (15) dollars per person for a total of approximately sixty (60) dollars. The employee believes there were more than twenty-five (25) attendees.

TCC is a distributor of traffic control safety devices that are used by the INDOT traffic engineering division. The event is being put on and the lunch is being provided by TCC, which has a business relationship with INDOT.

42 IAC 1-1-1(a) prohibits Department employees from accepting food, drinks, registration fees, and travel expenses from a person with whom INDOT has a business relationship. Because INDOT has a business relationship with some ATSSA members and sponsors, Department employees cannot accept such items of value paid for by ATSSA without obtaining a waiver under 42 IAC 1-5-1(c).

The TCC Cabinet Trouble Shooting & TS2 Review is primarily educational in nature. The four INDOT employees attended educational sessions about products used by INDOT Traffic Engineering. Their attendance will enhance their ability to operate and troubleshoot problems with the equipment.

INDOT personnel covered by this waiver were instructed not to accept any other item of value from any other person or entity if that person or entity may have a business relationship with INDOT or may seek to influence an action by one or more INDOT personnel in his or her official capacity. INDOT personnel are regularly informed that the safest course of action at any industry event is to assume that anyone in attendance might have a business relationship with or operational interest in the Indiana Department of Transportation.

Indiana Code 8-23-2-4.1(4)(A) provides that INDOT is responsible for the “construction, reconstruction, improvement, maintenance, and repair of (state) highways” and Indiana Code 8-23-2-5(a)(4) imposes upon INDOT the statutory duty to “evaluate and utilize whatever possible improved transportation facility maintenance and construction techniques.” By attending the TCC Cabinet Trouble Shooting and TS2 Review, the participating INDOT employees were educated concerning an understanding of troubleshooting traffic signal equipment at the cabinet level. There was also a review of TS2 standards and practices.

Therefore, it is my opinion that is consistent with the public interest for the INDOT Traffic Highway Engineer Supervisor, Prakash Patel, Highway Engineer 2, Shahpor Shahbahrami, Highway Engineer 2, Ankur Desai, and Highway Engineer 2, Ivan Anwar Syed, to attend Traffic Control Corporation’s 2026 Cabinet Trouble Shooting & TS2 Review and to receive the items of value specified above, which totals approximately sixty (60) dollars even though payment for these items was made by TCC, an industry distributor with an interest in INDOT business.. Based on this finding, I am hereby waving application of 42 IAC 1-5-1 (a) to allow INDOT Traffic Highway Engineer Supervisor, Prakash Patel, Highway Engineer 2, Shahpor Shahbahrami, Highway Engineer 2, Ankur Desai, and Highway Engineer 2, Ivan Anwar Syed to attend the TCC Cabinet Trouble Shooting and TS2 Review held on February 18, 2026.

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

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

Very Respectfully Submitted,



Chris Devlin  
Attorney Senior and Ethics Officer  
Indiana Department of Transportation