



STATE OF INDIANA
OFFICE OF THE GOVERNOR
State House, Second Floor
Indianapolis, Indiana 46204

Mike Braun
Governor

September 18, 2026

FILED

IC 4-2-6-11
Post-employment waiver

SEP 24 2026

INDIANA STATE
ETHICS COMMISSION

As the Appointing Authority of the Office of the Governor, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Sophie McGowen in her post-employment with John Frick and Associates. (JFA).

I understand that I must file and present this waiver to the State Ethics Commission at their next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

Ms. McGowen served as the Assistant to the Chief of Staff in the Governor's office. She served in that capacity from January 2025 until March 2026. From March 2026 to July 2026, Ms. McGowen worked as a financial services representative with Charles Schwab. In August, Ms. McGowen accepted a role with JFA, which does legislative and executive branch lobbying on behalf of various clients. This waiver pertains to the "cooling off" period set forth in Indiana Code 4-2-6-11(b)(1), as further discussed herein.

A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of:

- ☒ IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.
- ☐ IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.
- ☐ IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.

☐ IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker.

B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization.

1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

Ms. McGowen served as the Assistant to the Chief of Staff in the Governor's office. She served in that capacity from January 2025 until March 2026. In that role, Ms. McGowen handled normal executive assistant responsibilities, including calendar management, communication gatekeeping, travel coordination, document and report preparation, and other responsibilities as assigned. Ms. McGowan had no oversight, influence, or involvement in any policy, rule, or contract for the Governor's Office or any agencies, nor did she have any role in the implementation of any policies, rules, or contracts, involving her current employer, John Frick and Associates (JFA), or its clients.

2. Please describe the nature of the duties to be performed by the employee for the prospective employer:

Ms. McGowen will serve as an Associate of Legislative and Executive Affairs for JFA. Ms. McGowen will serve as a secondary liaison to the Indiana General Assembly and will be responsible for monitoring and influencing legislative developments for a diverse group of clients.

3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:

Ms. McGowen's proposed role at JFA will not involve substantial contact with the Governor's Office or Executive Branch agencies. Ms. McGowen's primary role will be monitoring and influencing legislative developments for a diverse group of clients. Any contacts with Executive Branch agencies will be for the purpose of information gathering related to legislative initiatives and not for the purpose of lobbying for executive action. This waiver is sought in an

abundance of caution so that such communications with State agencies can be facilitated.

4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest:

JFA's work involves cooperation with the state to advance and regulate multiple industries. JFA clients provide jobs and services and grow revenue for the state through taxation. Ms. McGowen's experience at the state level of government will allow her to more effectively keep her clients informed of changes in laws and regulations, better navigate state regulatory processes, and fulfill her clients' public-serving missions.

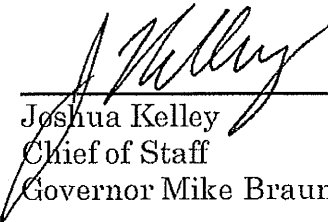
5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

Given the nature of Ms. McGowen's prior role as an administrative member of the Governor's staff, most opportunities her background qualify her for could arguably involve some form of conflicts. In effect, Ms. McGowen would need to solely engage in legislative branch lobbying or move out of state to avoid such conflicts, which would be an economic hardship for Ms. McGowen.

C. Signatures

1. Appointing authority/state officer of agency

By signing below, I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.



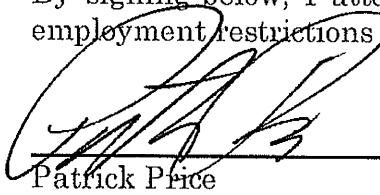
Joshua Kelley
Chief of Staff
Governor Mike Braun

DATE

9/12/2026

2. Ethics Officer of agency

By signing below, I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).



Patrick Price

General Counsel

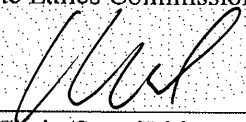
Office of Governor Mike Braun

09/18/2026
DATE

D. Approval by State Ethics Commission

FOR OFFICE USE ONLY

Approved by State Ethics Commission



Katherine Noel, Chair, State Ethics Commission

9-24-26
Date

Mail to:

Office of Inspector General
315 West Ohio Street, Room 104
Indianapolis, IN 46202

OR

Email scanned copy to: info@ig.in.gov

*Upon receipt you will be contacted with
details regarding the presentation of this
waiver to the State Ethics Commission.*