

**MINUTES OF THE MEETING OF  
THE INDIANA STATE ETHICS COMMISSION  
September 12, 2019**

**I. Call to Order**

A regular meeting of the State Ethics Commission (“Commission”) was called to order at 10:00 a.m. Commission members present included Katherine Noel, Chairperson; Sue Anne Gilroy; Corinne Finnerty; and Priscilla D. Keith (arrived at 10:13 a.m.). Staff present included Jennifer Cooper, Ethics Director; Kelly Elliott, Staff Attorney; Heidi Adair, Staff Attorney; Tiffany Mulligan, Chief Legal Counsel; Darrell Boehmer, Director of Investigations, Office of Inspector General; and Nathan Baker, Legal Assistant, Office of Inspector General.

Others present were Will Forrest, Director of Legal Affairs and Ethics Officer, Indiana State Fair Commission; Kathy Mills, Attorney, Indiana Department of Environmental Management; Connie Neining, Business Development Director, Indiana State Department of Agriculture; Alecia Nafziger, Associate Commissioner and CFO, Indiana Commission for Higher Education; Kendra Leatherman, Legislative Director, Auditor of State; Aaron Burgess, Data Scientist, Family and Social Services Administration; Erin Sheridan, Deputy Chief of Staff, Lieutenant Governor; James Betley, Executive Director, Indiana Charter School Board; Jake May, Director of Compliance, Indiana Education Employment Relations Board; Kristen Wolfred, Director of Optimization and Strategy, Indiana State Fair Commission; Tammera Glickman, Deputy General Counsel, Indiana Department of Administration; Elizabeth Polleys Burden, Associate General Counsel, Department of Workforce Development; Chris Kulik, Staff Attorney, Indiana State Department of Health; Nicole Buskill, General Counsel, Department of Financial Institutions; Lyndsay Miller, General Counsel, Department of Financial Institutions; Mattheus Mitchel, Compliance and Ethics Specialist, Department of Revenue; Amber Nicole Ying, Special Counsel, Compliance and Ethics, Department of Revenue; Precious Johnson, Administrative Assistant, Department of Natural Resources; Latosha Higgins, Managing Attorney and Ethics Officer, Family and Social Services Administration; Dan Johnson, Chief Counsel – Advisory, Office of Attorney General; and Deana Smith, Ethics Officer, Indiana State Department of Health.

**II. Adoption of Amended Agenda and Approval of Minutes**

Commissioner Gilroy moved to adopt the amended Agenda reflecting that Cindy Hoye was not present regarding the Waiver of Post-Employment Restrictions for Alecia Nafziger and Commissioner Finnerty seconded the motion which passed (3-0). Commissioner Gilroy moved to approve the Minutes of the August 8, 2019 Commission Meeting and Commissioner Finnerty seconded the motion which passed (3-0).

**III. Consideration of Indiana Commission for Higher Education Waiver of Post-Employment Restrictions for Alecia Nafziger**

Josh Garrison, Indiana Commission for Higher Education Associate Commissioner and Ethics Officer, via telephone, presented the proposed Waiver of Post-Employment Restrictions in this matter to the Commission for their approval.

Commissioner Gilroy moved to approve the Waiver, and Commissioner Finnerty seconded the motion which passed (3-0).

**IV. Consideration of Indiana State Fair Commission Waiver of Post-Employment Restrictions for Kristen Wolfred**

Will Forrest, Indiana State Fair Commission Legal Affairs and Ethics Officer, presented the proposed Waiver of Post-Employment Restrictions in this matter to the Commission for their approval.

Commissioner Gilroy moved to approve the Waiver, and Commissioner Finnerty seconded the motion which passed (3-0).

**V. Consideration of Indiana State Department of Agriculture Waiver of Post-Employment Restrictions for Connie Neining**

Bruce Kettler, Indiana State Department of Agriculture Director, via telephone, and Erin Sheridan, Indiana State Department of Agriculture Ethics Officer, presented the proposed Waiver of Post-Employment Restrictions in this matter to the Commission for their approval.

Commissioner Gilroy moved to approve the Waiver, and Commissioner Keith seconded the motion which passed (4-0).

**VI. Request for Formal Advisory Opinion**

2019-FAO-015

Aaron Burgess, Data Scientist

Latosha N. Higgins, Managing Attorney and Ethics Officer

Family & Social Services Administration

Latosha Higgins is the Ethics Officer for the Indiana Family and Social Services Administration (FSSA). Ms. Higgins is requesting an advisory opinion on behalf of Aaron Burgess, Data Scientist in the Data & Analytics subdivision in FSSA's Division of Healthcare Strategies and Technology.

Mr. Burgess began working for FSSA in this position in 2018. In this position, he is responsible for planning, architecture, and development of analytic tools and models that serve

agency needs as related to various agency populations and policies. In addition, Mr. Burgess is a member of a larger data science team that now consists of five members, including himself. His role on the team is to train and advise team members, review team members' work, implement best practices and standard operating procedures, and serve as a liaison for the team in agency meetings.

FSSA serves various Hoosier populations in need of social services. The programs and policies related to these populations create significant volumes of data. Mr. Burgess was hired because of his expertise in data science and engineering to assist FSSA with tools and models that utilize said data to improve population health outcomes, increase population access to care, decrease population costs and provide for any specific need that can be addressed by the skill sets employed within the paradigm of data science and engineering.

Mr. Burgess is interested in pursuing employment with KSM Consulting, LLC (KSM), a company that currently has a business relationship with FSSA. Mr. Burgess has not applied for a position at this time; however, he is interested in applying for a posted position titled Senior Data Scientist.

KSM is a consulting firm based in Indianapolis that provides services to various State of Indiana agencies, including FSSA. KSM currently has two active contracts with FSSA. Although one of these contracts (#36132, set to expire March 31, 2020) does not impact work within the Data & Analytics unit, the second contract (#29998) has utilized Mr. Burgess as a collaborator on the project. This contract is to assist with a technical assistance grant FSSA was awarded from the National Governors Association (NGA) to expand and enhance data governance to derive more value from the Medicaid and health data maintained by the State. That contract is set to expire December 31, 2019. KSM also provides services to clients in private markets and governments not associated with the State.

As a collaborator on the KSM contract, Mr. Burgess interacts with KSM to provide technical assistance to the project team, review code and provide feedback on data solutions. Although Mr. Burgess has served as a collaborator to the project team, he has never been part of the FSSA team that made contract decisions. He does not supervise KSM staff, and he has no direct oversight or influence over the KSM project direction or deliverables.

Mr. Burgess has never been involved in the negotiation or administration of any past or current contract between KSM and FSSA, nor was he in a position to influence those decisions. Mr. Burgess does not make regulatory or licensing decisions in his role. The primary individual responsible for overseeing the day to day activities of the KSM contract (#29998) is FSSA's Chief Data Officer, Dr. Connor Norwood. The primary individual responsible for overseeing the day to day activities of the other contract (#36132) is FSSA's Chief Information Officer, Mr. Jared Linder.

Regarding the employment position at issue, the Senior Data Scientist position at KSM would spend the majority of his time developing and applying machine learning and advanced analytics algorithms to solve complex problems. The position would also collaborate with data architects and software developers to plan and construct the architecture for self-service

business intelligence and advance analytic solutions. If hired as a Senior Data Scientist, Mr. Burgess would be primarily responsible for the design, development and implementation of technical solutions for KSM clients.

In the event that FSSA contracts with KSM in any future work, KSM and Mr. Burgess would ensure that Mr. Burgess' role was limited to developing and advising on the design, development and deployment of technical solutions that does not include any particular matter subject to restrictions under the Indiana ethics laws.

Mr. Burgess knows and understands that Indiana's ethics laws will continue to apply to him as a private sector employee. He understands and agrees not to divulge confidential information of FSSA during his post-employment endeavors. Furthermore, Mr. Burgess understands and agrees to abide by the one-year cooling off restriction regarding registering as an executive branch lobbyist.

FSSA is seeking the Commission's opinion regarding the application of any of the rules in the Code of Ethics to Mr. Burgess' post-employment opportunity with KSM.

### **ISSUE**

What rules in the Code apply to Mr. Burgess' post-employment opportunity with KSM?

### **ANALYSIS**

#### *A. Confidential Information*

IC 4-2-6-6 prohibits Mr. Burgess from accepting any compensation from any employment, transaction or investment that was entered into or made as a result of material information of a confidential nature. So long as any compensation Mr. Burgess receives does not result from confidential information, his potential employment with KSM would not violate IC 4-2-6-6.

#### *B. Conflict of Interests*

IC 4-2-6-9(a)(1) prohibits Mr. Burgess from participating in any decision or vote, or matter related to that decision or vote, if he has a financial interest in the outcome of the matter. Similarly, IC 4-2-6-9(a)(4) prohibits him from participating in any decision or vote, or matter related to that decision or vote, in which a person or organization with whom he is negotiating or has an arrangement concerning prospective employment has a financial interest in the outcome of the matter. The definition of financial interest in IC 4-2-6-1(a)(11) includes, "an interest arising from employment or prospective employment for which negotiations have begun."

Based on the information provided, Mr. Burgess has not formally applied for the position of Senior Data Scientist at KSM. Mr. Burgess clarified that he has not been approached

by KSM, nor has he had any back and forth communication with them regarding employment opportunities.

Once employment negotiations begin, Mr. Burgess would be prohibited from participating in any decision or vote, or matter related to a decision or vote, in which he, by virtue of his employment negotiations with KSM, would have a financial interest in the outcome of the matter.

Mr. Burgess collaborates on one of KSM's FSSA contracts and interacts with KSM to provide technical assistance to the project team, reviews code and provides feedback on data solutions. Ms. Higgins provides that Mr. Burgess is not part of the FSSA team that makes contract decisions. He also does not supervise KSM staff nor does he have any direct oversight or influence over the KSM consulting project direction or deliverables.

The Commission determined that Mr. Burgess' interactions with KSM are limited to technical matters including analyzing data and he does not participate in any decisions or votes, or related matters, in which KSM would have a financial interest in the outcome. Ms. Higgins provided that should Mr. Burgess apply for a position with KSM and begin employment negotiations, he would be screened from further collaboration with KSM out of an abundance of caution.

### *C. Post-Employment*

IC 4-2-6-11 consists of two separate limitations: a "cooling off" period and a "particular matter" restriction. The first prohibition, commonly referred to as the cooling off or revolving door period, prevents Mr. Burgess from accepting employment from an employer for 365 days from the date that he leaves state employment under various circumstances.

First, Mr. Burgess is prohibited from accepting employment as a lobbyist for the entirety of the cooling off period. A lobbyist is defined as an individual who seeks to influence decision making of an agency and who is registered as an executive branch lobbyist under the rules adopted by the Indiana Department of Administration.

Ms. Higgins provides that Mr. Burgess understands he is prohibited from engaging in any lobbying activities in his prospective employment with KSM. To the extent that Mr. Burgess does not engage in executive branch lobbying for one year after leaving state employment, the Commission finds that his intended employment with KSM would not violate this provision of the post-employment rule.

Second, Mr. Burgess is prohibited from accepting employment for 365 days from the last day of his state employment from an employer with whom 1) he engaged in the negotiation or administration of a contract on behalf of a state agency and 2) was in a position to make a discretionary decision affecting the outcome of the negotiation or nature of the administration of the contract.

Mr. Burgess' responsibilities at FSSA include collaborating and interacting with KSM on matters related to KSM's FSSA contract. According to Ms. Higgins, Mr. Burgess has not engaged in the negotiation or administration of any contract between the State and KSM, nor was he in a position to make a discretionary decision affecting the outcome of the negotiation or administration of any contract with KSM.

According to Ms. Higgins, Mr. Burgess' interactions with KSM involve analysis of data, code and models, and he is not involved in any aspects of their contract with FSSA.

The Commission finds that Mr. Burgess would not be subject to the cooling off restriction for his role in interacting with KSM as a Data Scientist. He did not administer KSM's contract nor was he in a position to make discretionary decisions affecting the nature of the administration of the contract.

Third, Mr. Burgess is prohibited from accepting employment for 365 days from the last day of his state employment from an employer for whom he made a regulatory or licensing decision that directly applied to the employer or its parent or subsidiary.

Ms. Higgins provides that Mr. Burgess does not make any regulatory or licensing decisions in his position with FSSA. Accordingly, the Commission finds that Mr. Burgess has never made any regulatory or licensing decisions that applied to KSM as a state employee.

Fourth, Mr. Burgess is prohibited from accepting employment from an employer if the circumstances surrounding the hire suggest the employer's purpose is to influence him in his official capacity as a state employee. The information presented to the Commission does not suggest that KSM has extended an offer of employment to Mr. Burgess in an attempt to influence him in his capacity as a state employee.

Accordingly, the Commission finds that Mr. Burgess may accept employment with KSM immediately upon leaving state employment.

Finally, Mr. Burgess is subject to the post-employment rule's "particular matter" prohibition in his prospective post-employment. This restriction prevents him from representing or assisting a person on any of the following twelve matters if he personally and substantially participated in the matter as a state employee: 1) an application, 2) a business transaction, 3) a claim, 4) a contract, 5) a determination, 6) an enforcement proceeding, 7) an investigation, 8) a judicial proceeding, 9) a lawsuit, 10) a license, 11) an economic development project or 12) a public works project. The particular matter restriction is not limited to 365 days but instead extends for the entire life of the matter at issue, which may be indefinite.

In this instance, Mr. Burgess would be prohibited from representing or assisting KSM, as well as any other person, in a particular matter in which he personally and substantially

participated as a state employee. Ms. Higgins provides that Mr. Burgess and KSM would ensure that Mr. Burgess' role was limited to developing and advising on design, development and deployment of technical solutions and that his work will not include any particular matters.

The Commission finds that Mr. Burgess must ensure compliance with the particular matter restrictions and refrain from assisting or representing any person on any other particular matters, including contract #29998, in which he may have been personally and substantially involved during his state employment.

Commissioner Gilroy moved to approve the Commission's findings, and Commissioner Keith seconded the motion which passed (4-0).

## **VII. Request for Formal Advisory Opinion**

2019-FAO-016

Leslie Dillon, Board Member

James R. Betley, Executive Director

Indiana Charter School Board

James Betley is the appointing authority for the Indiana Charter School Board (ICSB). Mr. Betley, along with ICSB's Ethics Officer, Jacob May, are requesting an advisory opinion on behalf of Leslie Dillon, who serves as a board member on ICSB.

ICSB was established by Public Law 91-2011 for the purpose of authorizing charter schools throughout Indiana. IC 20-24-2.2-1(a). It is composed of the following nine (9) members appointed to four (4) year terms:

- (1) Four (4) members appointed by the governor. Not more than two (2) members appointed under this subdivision may be members of the same political party.
- (2) One (1) member who has previous experience with or on behalf of charter schools appointed by the state superintendent of public instruction.
- (3) Four (4) members, who may not be legislators, appointed as follows:
  - a. One (1) member appointed by the president pro tempore of the Senate.
  - b. One (1) member appointed by the minority leader of the Senate.
  - c. One (1) member appointed by the speaker of the House of Representatives.
  - d. One (1) member appointed by the minority leader of the House of Representatives.

IC 20-24-2.2-1(b).

Members appointed to ICSB must collectively possess strong experience and expertise in: 1) public and nonprofit governance; 2) management; 3) finance; 4) public school leadership; 5) higher education; 6) school assessments, curriculum, and instruction; and 7) public education law. IC 20-24-2.1-1(f). A majority of the members appointed to ICSB constitutes a quorum. The

affirmative votes of a majority of the members present are required for ICSB to take action. IC 20-24-2.1-1(d).

ICSB's specific duties include: 1) reviewing proposals to establish a charter school; 2) making decisions on proposals to establish charter schools; 3) monitoring charter schools authorized by the board; and 4) making decisions on the renewal, nonrenewal, and revocation of charters granted by the charter board. IC 20-24-2.1-2. ICSB typically meets four to five times a year. Specific voting matters include:

- 1) Approval of charter applications;
- 2) Approval of charter activation;
- 3) Renewal of existing charter agreements;
- 4) Approval of charter school closure;
- 5) Approval of material changes to charter agreements; and
- 6) Approval of board policies and procedures.

Indiana Senate Minority Leader Tim Lanane appointed Ms. Dillon to ICSB. She is currently employed by Gary Community School Corporation (GCSC) as dean of students at Williams Elementary and is a member of the executive board of the Gary Teachers Union, which is an affiliate of the American Federation of Teachers (AFT).

ICSB currently authorizes three operating charter schools located within GCSC, has received numerous applications for charter schools located within GCSC in the past, and anticipates that it will continue to receive applications for charter schools located within GCSC.

Both charter public schools and traditional public schools receive state funding through application of Indiana's tuition support formula. The funding formula uses two count dates, one in September and one in February, to determine a school's Average Daily Membership (ADM), a physical count of students enrolled and attending the school on a particular day. A school's total tuition support is based on a school's ADM count multiplied by several grants, including the "basic grant," comprised of a base amount per student, and the "complexity grant," which is additional funding based on the school corporation's percentage of students who qualify for Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, or who received foster care services.

Because school funding is based on a school's current year ADM count, student mobility from year to year, or between the September and February count dates, directly impacts the amount of funding a school receives, e.g. funding follows the child. As a result, any time a child leaves a traditional public school to attend a public charter school, or vice-versa, the former school corporation or school receives less funding than it would have if the child had remained. This economic reality is often used by opponents of charter schools, including teachers unions, to argue that charter schools are directly harming the traditional public school system.



ICSB is seeking advice to determine whether Ms. Dillon would have a conflict of interests under IC 4-2-6-9 if she voted on matters including but not limited to approval, renewal, monitoring, and closure related to a specific charter school that is currently located in, or proposing to locate in, GCSC.

ICSB further requested the Commission's guidance on whether Ms. Dillon would have a conflict of interests under IC 4-2-6-9 if she voted on matters including but not limited to approval, renewal, monitoring, and closure related to a specific charter school that is currently located in, or proposing to locate in, a school corporation adjoining GCSC. This concern stems from the fact that every nearby open-enrollment school corporation and every currently operating charter school located in an adjoining school corporation serves at least some students with a legal settlement in GCSC and on the assumption that it is highly likely that any new school that is authorized would draw students (and thus funding) from GCSC.

If it is determined that Ms. Dillon would have a potential conflict of interests, ICSB would apply the following proposed screening process that they developed for ICSB members to Ms. Dillon, to ensure she does not violate IC 4-2-6-9:

“To address any potential conflicts that may arise with respect to [board member] and [the entity or organization in which the member has financial interest], and to ensure compliance with the conflict of interest laws, the board member shall notify his or her appointing authority of [the relationship leading to the conflict]. ICSB's Ethics Officer has established the following procedures to screen the board member from participating in any decision or vote, or a matter relating to that decision or vote relating to [the entity or organization in which the member has financial interest]:

- 1) ICSB's Ethics Officer shall monitor the board member's involvement in any matter relating to [the entity or organization in which the member has financial interest] to ensure that the screening procedures are followed.
- 2) If any matter related to [the entity or organization in which the member has financial interest] is presented to ICSB for a discussion and vote, the board member will recuse him or herself from the discussion and vote, as well as submit an “Ethics Disclosure Statement” to the OIG.
- 3) The board member will not be permitted access to any confidential information concerning [the entity or organization in which the member has financial interest] without the written approval of ICSB's Ethics Officer.
- 4) ICSB staff will screen the board member from any and all involvement in matters involving [the entity or organization in which the member has financial interest], including refraining from any discussion in the Board member's presence that might be related to matters involving [the entity or organization in which the member has financial interest].
- 5) The fact that the individual is both an ICSB board member and has a financial interest in [the entity or organization in which the member has financial interest] does not serve as an endorsement by ICSB of [the entity or organization in which the member has financial interest], other than that which normally exists between [the entity or organization in which the member has financial interest] and ICSB as a charter school authorizer.

- 6) ICSB's Ethics Officer will provide written notice to the OIG anytime the screening procedures are implemented.

### **ISSUE**

What ethics issues, if any, arise for Ms. Dillon as a special state appointee (and member of the ICSB), who is also employed by the GCSC?

### **ANALYSIS**

#### *A. Conflict of interests - decisions and votes*

Under IC 4-2-6-9, Ms. Dillon, as a special state appointee, is prohibited from participating in a decision or vote, or matter relating to that decision or vote, if she has knowledge that any of the following has a financial interest in the outcome of the matter:

- (1) The special state appointee;
- (2) Any of the special state appointee's immediate family members;
- (3) A business organization in which the special state appointee is serving as an officer, a director, a member, a trustee, a partner or an employee; or
- (4) Any person or organization with whom the special state appointee is negotiating or has an arrangement concerning prospective employment.

The Code defines "financial interest" in IC 4-2-6-1(a)(11) to include "an interest . . . in a purchase, sale, lease, contract, option, or other transaction between an agency and any person; or . . . involving property or services. . . ." The term does not include an interest that is not greater than the interest of the general public or any state officer or any state employee.

If a matter requiring a decision or vote comes before ICSB and Ms. Dillon knows that any of the persons outlined above would have a financial interest in the outcome of ICSB's actions, she cannot participate in the matter. Further, she must disclose the interest and be screened from the matter under the supervision of the agency's Ethics Officer. The disclosure and screening process must be carried out through the filing of an ethics disclosure form with the OIG or the request for a formal advisory opinion from the Commission.

The Commission finds that Ms. Dillon's employer, GCSC, would have a financial interest in the outcome of decisions/votes related to charter schools located in or proposing to locate in GCSC and possibly in decisions/votes concerning charter schools in the districts adjoining GCSC. Specifically, votes to approve, renew, monitor, or close a charter school would have a financial impact on GCSC; any time a child leaves a traditional public school within GCSC or an

adjoining district to attend a public charter school, or vice-versa, GCSC or the school receives less funding than it would have if the child had remained.

The Commission understands that Ms. Dillon's role on the ICSB is to provide a voice for the students in public schools, and these restrictions limit her involvement as a voting member of the ICSB when matters involving charter schools in her region come before the ICSB. The Commission suggests that ICSB consider pursuing a legislative solution to allow Ms. Dillon to participate in discussions on these matters in some limited capacity; however, under the Code of Ethics, specifically IC 4-2-6-9(a), she is prohibited from participating in any decisions or vote, or matter related to any such decision or vote, in which her employer would have a financial interest in the outcome.

The Commission finds that her employer would have a financial interest in decisions/votes related to charter schools located within GCSC. The Commission further finds that her employer would possibly have an interest in decisions/votes regarding charter schools in adjoining districts based on the information provided by Mr. Betley.

Accordingly, Ms. Dillon is not permitted to participate in any discussions or decisions/votes coming before the ICSB regarding a charter school within GCSC and must follow all of the requirements in IC 4-2-6-9 each time a potential conflict of interests is identified. Further, the Commission advises that Ms. Dillon should use caution and also follow the requirements in IC 4-2-6-9(b) any time there is a possibility her employer would have a financial interest in decisions/votes regarding charter schools that come before the ICSB, including matters concerning charter schools in adjoining districts.

In order to comply with the requirements in IC 4-2-6-9(b), Ms. Dillon must provide a public disclosure of the potential conflict of interests and a description of the screen in place to ensure she does not participate in these matters through either the filing of a disclosure form with the OIG or through a formal advisory opinion request to the Commission.

ICSB had requested this formal advisory opinion on Ms. Dillon's behalf and submitted a proposed screen for the Commission's approval. The Commission finds that this screen is adequate to ensure that Ms. Dillon is screened from all matters before the ICSB in which her employer would have a financial interest.

#### *B. Confidential information*

Ms. Dillon is prohibited under 42 IAC 1-5-10 and 42 IAC 1-5-11 from benefitting from, permitting any other person to benefit from, or divulging information of a confidential nature except as permitted or required by law. To the extent that Ms. Dillon will possess information of a confidential nature by virtue of her position with ICSB that could be used to benefit GCSC, or any other person, she must ensure that she complies with these rules.

Commissioner Finnerty moved to approve the Commission's findings, and Commissioner Gilroy seconded the motion which passed (4-0).

**VIII. Consideration of Agreed Settlement**

In the Matter of Jason Coffey  
Case Number 2019-02-0035  
Heidi Adair, Staff Attorney  
Indiana Office of Inspector General

Heidi Adair presented the proposed Agreed Settlement in this matter to the Commission for their approval.

Commissioner Finnerty moved to approve the Agreed Settlement and Commissioner Keith seconded the motion which passed (4-0).

**IX. Director's Report**

State Ethics Director, Jen Cooper, stated that since the last Commission meeting, the Office of Inspector General had issued 31 informal advisory opinions on the subjects of post-employment restrictions, conflicts of interests, outside employment, and gifts.

She further advised that the State Ethics Training was set to launch on October 1, 2019 for all State Employees and Special State Appointees. Ms. Cooper also stated that the 2019 Legal and Ethics Conference is set to take place on November 14, 2019 and extended an invitation for the Commissioners to attend.

**X. Adjournment**

Commissioner Keith moved to adjourn the public meeting of the State Ethics Commission and Commissioner Gilroy seconded the motion, which passed (4-0).

The public meeting adjourned at 10:57 a.m.