315 WEST OHIO STREET, ROOM 104, INDIANAPOLIS, IN 46202 317.232.3850

# Public Meeting Packet Indiana State Library, Room 401 December 18, 2025

# STATE ETHICS COMMISSION

315 WEST OHIO STREET, ROOM 104, INDIANAPOLIS, IN 46202 317.232.3850

## December 18, 2025 10:00 a.m.

Indiana State Library, Fourth Floor, Room 401, 315 West Ohio Street, Indianapolis, Indiana 46202

| <b>Commission Member</b> | Term Began      | Term Ends         | <b>Appointing Authority</b> |
|--------------------------|-----------------|-------------------|-----------------------------|
| Katherine Noel, Chair    | January 1, 2022 | December 31, 2025 | Governor                    |
| Corinne Finnerty         | January 1, 2022 | December 31, 2025 | Governor                    |
| Sue Anne Gilroy          | March 1, 2024   | December 31, 2027 | Governor                    |
| Rafael Sanchez           | January 1, 2024 | December 31, 2027 | Governor                    |
| Robert Duncan            | January 6, 2025 | July 31, 2026     | Governor                    |

#### **Public Meeting**

I. Adoption of the Agenda

10:00 a.m.

- II. Approval of Minutes of November 13, 2025
- III. Consideration of Post-Employment Waivers
  - a. Indiana Department of Natural Resources Caleb Williams

Presented by DNR Ethics Officer Stephanie Flittner

b. Indiana Economic Development Corporation – Alicia McFayden

Presented by Mark Wasky

- IV. Consideration of Agreed Settlement
  - a. In Re Jennifer-Ruth Green 2025-03-0077
    - i. Consideration of Final Report
- V. State Ethics Commission Director's Report

#### **Executive Session**

VI. Consideration of Probable Cause Affidavit

10:30 a.m.

Initiation of litigation/receiving information concerning an individual's alleged misconduct (probable cause affidavit presentation) as permitted by IC 5-14-1.5-6.1(b)(2)(B), IC 5-14-1.5-6.1(b)(6)(A), IC 4-2-6-4(b)(2)(E)

Join the meeting via livestream here (https://teams.microsoft.com/l/meetup-

join/19%3ameeting\_ODNIMzYyMmItMjE0My00MDJiLTgyOTMtMjcwYzUxZDE2M2U5%40thread.v2/0?context =%7b%22Tid%22%3a%222199bfba-a409-4f13-b0c4-18b45933d88d%22%2c%22Oid%22%3a%22b97cc08d-0b9a-473a-be07-5569c824969e%22%7d)

# STATE ETHICS COMMISSION

315 WEST OHIO STREET. ROOM 104. INDIANAPOLIS. IN 46202 317.232.3850

Minutes of the Indiana State Ethics Commission November 13, 2025 At 10:00 am

Indiana State Library
Indiana Authors Room
315 West Ohio Street, Second Floor
Indianapolis, IN 46202

#### **Commission Members Present:**

Katherine Noel, Chair Sue Anne Gilroy Robert Duncan Corinne Finnerty (via Teams)

#### **OIG Members Present:**

Regan Perrodin, State Ethics Commission Director
Adam Garrigus
Jared Prentice
Elaine Vullmahn
Will Deane
JJ Fajt
Mike Lepper
Sam Stearley
Rachel Gallagher
Cassandra Doss
Dwaine Brinson

#### I. Call to Order and Establishment of Quorum

10:00 am

Katherine Noel calls the meeting to order.

#### II. Adoption of Agenda

Commissioner Gilroy made a motion to adopt the agenda. Commissioner Duncan seconded.

Approved: 4/0

#### III. Approval of Minutes from October 9, 2025

Commissioner Gilroy made a motion to approve the minutes. Commissioner Duncan seconded.

Approved: 4/0

#### IV. Consideration of Post-Employment Waivers

a. Consideration of Post-Employment Waiver for:
 Department of Workforce Development – Marilyn Pitzulo
 Presented by Ethics Officer Amie Durfee

Amie Durfee was present and sworn in. Marilyn Pitzulo was not able to attend.

Appointing Authority Josh Richardson could not be here today and designated Amie Durfee to present the waiver which waives the cooling off restriction related to regulatory and licensing decisions.

Commissioner Gilroy made a motion to approve. Commissioner Duncan seconded.

Approved: 4/0

b. Consideration of Post-Employment Waiver for:
 Economic Development Corporation – Kyle Gaddis
 Presented by Ethics Officer Marjorie Millman

David Staples and Kyle Gaddis were both present and sworn in.

Appointing Authority David Adams could not be here today and designated David Staples to present the waiver which waives the cooling off restriction related to contracts.

Commissioner Gilroy made a motion to approve. Commissioner Duncan seconded.

Approved: 4/0

#### V. Consideration of Formal Advisory Opinions

a. Indiana Department of Homeland Security – Julie Smith Presented by Ethics Officer Kristi Shute

Kristi Shute and Julie Smith were both present and sworn in.

Julie Smith is requesting the commission's opinion on whether she can continue her outside professional activities in her new role as the Director of the Indiana Department of Homeland Security's Office of School Safety.

Commissioner Gilroy made a motion to approve. Commissioner Duncan seconded.

Approved: 4/0

#### VI. Consideration of 2026 Rulemaking

#### VII. Scheduling of State Ethics Commission Meeting Dates in 2026

Commissioner Gilroy made a motion to approve. Commissioner Duncan seconded.

Approved: 4/0

#### **VIII. State Ethics Commission Director's Report**

- 1. 15 Informal Advisory Opinions have been issued since the last meeting.
- 2. The OIG recently welcomed a new attorney, Rachel Gallagher, and a new member of their investigative team, Cassandra Doss.
- 3. The OIG's 2025 Legal and Ethics Conference will take place on November 20<sup>th</sup>.

#### IX. Adjournment

Commissioner Gilroy made a motion to adjourn; Commissioner Duncan seconded.

Approved: 4/0

The meeting adjourned at approximately 10:56 a.m.



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

As the Appointing Authority of Indiana Department of Natural Resources, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Caleb Williams in his/her post-employment with CAW, Inc.

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.

| This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of (Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving):  |
|---|
|   |
| 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. ( <i>Please provide a brief description of the specific particular matter(s) to which this waiver applies below</i> ): |
| 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. Please provide the requested information in the following five (5) sections to fulfill this requirement.   |
| Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:   |
|   |

From May 2023 through November 2023, Mr. Williams was employed as a Civil Engineer with DNR's Division of Engineering. From November 2023 through March 2025, he was a Civil Engineer

with DNR's Division of Reclamation. In these roles, his primary duties included:

- Preparing plans and bid documents for commercial construction and mine reclamation public works projects
- Serving as project manager overseeing work performed by engineering consultants on projects relating to water resources, wastewater, and dams
- Assisting with internal DNR requests for projects, including sorting requests and ensuring documentation was complete before submission to IDOA
- Obtaining surveying contracts and other supporting services needed to complete design plans, with those contracts routed through IDOA for award

Mr. Williams did not have substantial decision-making authority over DNR policies or rules. He did not personally award contracts, approve final specifications on behalf of DNR, sign addenda, or recommend awards. He states that final bid documents were transmitted to IDOA and that addenda and award recommendations were handled through IDOA. He also states that contract terms, change orders, and scope changes went through IDOA and that his role was limited to discussing scopes of work with consultants and reviewing invoices. However, since he prepared bid documents, including specifications and supervised the work of consultants, which includes evaluating their work performance, we are requesting this waiver out of an abundance of caution.

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

Mr. Williams has formed CAW Inc, dba CAW Engineering, an Indiana S-corporation in which he is the sole owner and sole employee. CAW Engineering is a professional civil engineering practice.

Through CAW Engineering, Mr. Williams plans to:

- Pursue civil engineering site work and mine reclamation projects
- Draft plans, specifications, and engineer's estimates for public works projects
- Potentially provide project management and on-site construction inspection services, although he anticipates that design work will be the primary service
- For DNR work, CAW Engineering would serve as a prime contractor or prime professional services vendor to DNR, not as an employee of DNR.
- Mr. Williams intends to begin offering services around December 29, 2025, subject to approval of this waiver and compliance with all applicable statutes, including the criminal profiteering statute described below.
- 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:

Mr. Williams anticipates that his DNR work through CAW Engineering would primarily involve the:

- Division of Reclamation
- Division of Fleet, Facilities, Asset Management and Engineering
- Project work could also involve coordination with other land-holding divisions such as State Parks, Forestry, and Fish and Wildlife.

#### Expected contact:

- Regular communication with DNR project managers and technical staff, including anticipated primary contacts such as Kit Turpin (Reclamation) and Greg Sorrels or Kent Hopper (Engineering)
- Submittal of plans, specifications, cost estimates, and related engineering work product for DNR review and approval
- Routine coordination regarding project progress, clarifications, and technical questions during design and construction

DNR recognizes that staff in these divisions will exercise discretion based on CAW Engineering's work product, including decisions related to design acceptance, change orders, and payments. That is consistent with the normal vendor-agency relationship for engineering services and does not, by itself, present a conflict that would prevent a waiver where public interest and hardship criteria are met.

#### Matters where Mr. Williams remains restricted

Under the particular matter restriction in IC 4-2-6-11(c), Mr. Williams may not represent or assist any person, including CAW Engineering, in any particular matter involving the state if he personally and substantially participated in that matter as a DNR employee, for the life of that matter, unless a future, specific waiver is approved.

For Mr. Williams, the following DNR projects are particular matters where he had personal and substantial participation:

- 1. DEL2216596392 Big Walnut Creek Septic
  - Drafted plans and specifications
  - Reviewed bids
  - Conducted site work
- 2. DEL2415208357 E008-367 Thousand Island Highwall
  - Drafted plans and specifications
  - Answered pre-bid questions
- 3. Scott Lake Highwall
  - Drafted plans
  - Project not completed before his separation
- 4. Round Lake Highwall
  - Drafted plans
  - Project not completed before his separation
- 5. CDC2315208535 Project E008-349 Green Valley Mine Pond Dam
  - Served as project manager
- 6. CDC2315208641 Reservoir 29
  - Served as project manager
  - Participated in an amendment moving the project from preliminary design to construction drawings and bid documents

This waiver does not authorize Mr. Williams to represent or assist CAW Engineering, any other entity, or any person in connection with these listed matters or any related amendments, rebids, or change orders. He remains fully subject to IC 4-2-6-11(c) for those matters.

If DNR later determines that it is in the public interest for Mr. Williams to work on any of these particular matters, DNR would need to seek a separate, matter-specific waiver of IC 4-2-6-11(c).

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:

DNR finds that allowing Mr. Williams to perform work for DNR through CAW Engineering, subject to the limitations in this waiver, is consistent with the public interest for the following reasons:

- Specialized expertise and capacity: Civil engineers are in high demand, and licensed engineers who can seal plans are particularly important for public works projects that must be competitively bid. DNR's Division of Reclamation performs highly specialized mine reclamation work. Mr. Williams has direct experience with DNR's reclamation standards and processes, and division staff have identified that there are relatively few consultants capable of delivering that work to DNR's expectations.
- Limited in-house resources: The Division of Reclamation currently has only one in-house engineer. Contracting with CAW Engineering will increase design capacity and allow more reclamation projects to move forward, which benefits public safety, environmental quality, and adjacent landowners.
- Continuity and efficiency for DNR projects: Mr. Williams is already familiar with DNR's internal procedures, technical standards, and field conditions. That familiarity should reduce training and coordination time for DNR staff, improve project delivery timelines, and promote better project outcomes, especially on complex reclamation projects.

DNR concludes that the requested waiver is consistent with the public interest because it enables the agency to use needed specialized expertise while maintaining clear guardrails around projects that pose a post-employment concern.

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

Mr. Williams has started CAW Engineering in order to operate a small civil engineering business. DNR work, particularly in the reclamation area, is an important part of his potential client base. If the waiver were denied and he could not pursue DNR work until after March 2026, or if he had to avoid DNR work entirely, it would significantly limit his ability to establish and sustain CAW Engineering as a viable business. He has explained that:

- DNR reclamation work is specialized and not widely available outside a small set of agencies and clients
- Prohibiting DNR work would materially reduce the volume and feasibility of his small business
- His family relies on his income to supplement his spouse's lower public school teacher salary, and being able to pursue DNR work beginning in late 2025 instead of after March 2026 would make a substantial difference in their financial stability

DNR finds that denial of this waiver would cause significant economic hardship to Mr. Williams and would unnecessarily limit the availability of a qualified engineering resource to DNR when public interest factors favor allowing the work.

#### 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.

Alan Morrison, Director

#### 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).

D. Approval by State Ethics Commission

| FOR OFFICE USE ONLY              |                 |      |
|----------------------------------|-----------------|------|
| Approved by State Ethics Comi    | mission         |      |
|                                  |                 |      |
| Katherine Noel, Chair, State Etl | hics Commission | 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.



December 11, 2025

Indiana State Ethics Commission c/o Office of Inspector General 315 W. Ohio Street, Room 104 Indianapolis, IN 46202

Re: Designation Letter

Dear Commissioners:

I serve as the Commissioner for Director for the Department of Natural Resources and the appointing authority for all staff of the Department of Natural Resources, including, our former employee, Mr. Caleb Williams. I have submitted a post-employment waiver for Mr. Williams for your consideration.

Since I will be unable to attend the State Ethics Commission's meeting on Thursday, December 18, 2025, I hereby designate Mrs. Stephanie Flittner, General Counsel, to present the above-referenced waiver on my behalf. Please feel free to direct any questions concerning the filing to Mrs. Flittner.

Thank you for your consideration of this waiver request.

Sincerely,

Alan Morrison, Director

Indiana Department of Natural Resources



# Indiana Code § 4-2-6-11 Post-Employment Waiver

As the Appointing Authority and President of the Indiana Economic Development Corporation (IEDC), I am filing this waiver of the application of certain post-employment restrictions of the Indiana Code of Ethics as they may apply to Alicia McFadyen, IEDC's Account Manager II & Operations Specialist (hereinafter, "McFadyen"), in her desired post-employment opportunity with McGuire Sponsel LLC (hereinafter, "MS").

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

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)(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(c): "particular matter" restriction limiting a former state employee from assisting in a particular matter if the former employee had substantially participated in the matter as a state employee.

- 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. Please provide the requested information in the following five (5) sections to fulfill this requirement.
  - 1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

As an Account Manager II & Operations Specialist at IEDC, McFadyen's duties involved the dayto-day maintenance of a portfolio of companies that had already entered into incentive agreements with the State of Indiana. She served as a point of contact for administrative matters, including tax credit certifications, annual reporting, and technical compliance questions. McFadyen did not have decision-making authority over policies, rules, or contracts.

All incentive agreements are negotiated by IEDC's Business Development division. Once terms are negotiated, McFadyen assembles the agreement using a standard template. Any edits or redlines proposed by a company are referred to IEDC legal counsel for review. Contracts are

approved by the Director of Account Management. McFadyen's role is limited to processing and implementing agreements that have already been approved by others.

McFadyen's day-to-day activities consisted of non-discretionary, ministerial tasks such as reviewing annual reports for completeness and accuracy and forwarding those materials to senior account managers or compliance managers who determine whether a company is compliant and eligible to receive an incentive. Although she has occasionally conducted secondary reviews of other account managers' work, this responsibility has been limited in scope and duration and did not place her in a position to grant, deny, revoke, or modify any incentive.

At no time did McFadyen participate in the evaluation of incentive applications, the negotiation of incentive offers, the determination of incentive amounts or structures, or the formulation of IEDC's negotiation strategy. She did not advocate for or against any incentive award and did not exercise discretion affecting the State's financial exposure.

Consistent with the Commission's reasoning in **2022-FAO-009**, McFadyen's role was administrative and ministerial in nature and did not involve personal and substantial participation in particular matters within the meaning of IC § 4-2-6-11.

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

MS provides specialty tax and incentive advisory services to companies and CPA firms nationwide. In connection with this post-employment opportunity, McFadyen will join MS's Location Advisory Services team.

Her private-sector duties may include assisting clients with compliance reporting, preparing incentive applications, and participating in negotiations on behalf of clients seeking state and local incentives. These responsibilities are materially different from her former role at IEDC, which did not include incentive evaluation, negotiation, or discretionary decision-making.

MS currently represents certain clients whose matters were within McFadyen's former IEDC portfolio. Consistent with IC § 4-2-6-11(b), McFadyen will be fully screened from any such matters during the applicable 365-day cooling-off period. This waiver does not authorize, and does not seek to authorize, her involvement in those matters during that statutory period.

In addition, McFadyen will be permanently screened from any involvement in MS's own incentive agreement with IEDC.

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 operates nationally, and McFadyen will not work exclusively on Indiana matters. Her portfolio may include some Indiana clients with incentive agreements administered by IEDC. MS acts as a consultant and is not a party to the incentive agreements between IEDC and its clients.

During the 365-day cooling-off period, McFadyen will not have contact with IEDC regarding any matter involving companies from her former IEDC portfolio. Any future contact with IEDC will occur through standard program channels and will be limited to matters in which she did not personally and substantially participate as a state employee.

IEDC does not believe that McFadyen's prospective employment presents any risk of undue influence, preferential access, or misuse of confidential information. McFadyen did not possess insight into IEDC's internal incentive valuation methodologies, negotiation strategy, or policy development processes.

# 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:

IEDC incentive agreements are intended to attract and retain high-quality jobs, support economic growth, and ensure that businesses meet their obligations to the State of Indiana. The effective administration of these programs depends on private-sector professionals who understand compliance requirements and can assist companies in fulfilling their commitments.

McFadyen's experience positions her to support compliance and transparency in the incentive process without creating any conflict of interest. Allowing her to continue working in this specialized field promotes economic development objectives and is consistent with the public interest standard set forth in IC § 4-2-6-11(g).

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

McFadyen has developed specialized expertise in incentive administration and compliance over six and a half years of public service. Denial of this waiver would significantly limit her ability to continue working in her field during a critical stage of her career.

McFadyen is the primary earner in her family. The increased compensation associated with this opportunity would provide financial stability and support for her young family. These considerations support approval of the requested waiver.

Based on the foregoing, the Appointing Authority finds that McFadyen's prior duties were ministerial and non-discretionary; that her prospective private-sector duties do not overlap with her former responsibilities; that the appropriate screening measures and in place; and that granting this waiver is consistent with the public interest and the purposes of IC 4-2-6-11.

#### C. Signatures

#### Appointing authority/state officer of agency.

| 1. Appointing authority/state officer of agency.  |     |
|---|-----|
| By signing below, I authorize the waiver of the above-specified post-employment restrictions pursuant IC § 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or specistate appointee who obtains the waiver before engaging in the conduct that would give rise to a violation | ial |
| John Dabas 12/16/25   |     |
| Joshua Richardson, Appointing Authority DATE  |     |
|   |     |
| 2. Ethics Officer of agency   |     |
| By signing below I attest to the form of this waiver of the above-specified post-employment restriction pursuant to IC $\S$ 4-2-6-11(g)(1)(B).  | ns  |
| David Staples, Ethics Officer  DATE  DATE   |     |
| D. Approval by State Ethics Commission  |     |
| FOR OFFICE USE ONLY   |     |
| Approved by State Ethics Commission   |     |
| Katherine Noel, Chair, State Ethics Commission  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.



December 16, 2025

Indiana Economic Development Corporation 1 North Capitol, Suite 700 Indianapolis, IN 46204

Re: Designation Letter

Dear Commissioners:

I serve as the President, Indiana Economic Development Corporation and submitting a post-employment waiver for Mrs. McFayden.

IEDC's Ethics Officer, David Staples, will be unable to attend the State Ethics Commission's meeting on Tuesday, December 16, 2025. I hereby designate Mr. Mark Wasky, SVP, Special Counsel to the Secretary of Commerce to present the above-referenced waiver on my behalf. Please feel free to direct any questions concerning the filling to

Sincerely,

Jøshua Richardson.

President, Indiana Economic Corporation

STATE OF INDIANA ) INDIANA STATE ETHICS COMMISSION ) SS:
COUNTY OF MARION ) CASE NO: 2025-03-0077

IN RE JENNIFER-RUTH GREEN, Respondent.

FC 0 -

#### AGREED SETTLEMENT

INDIANA STATE ETHICS COMMISSION

- 1. Respondent admits to violations of 42 IAC 1-5-4, the political activity rule, and Ind. Code § 4-2-6-17, the misuse of state property rule, and facts alleged in paragraphs 3 and 10 in the Ethics Complaint filed by the Office of Inspector General on September 12, 2025.
- 2. Respondent agrees to pay a fine in the amount of ten thousand dollars (\$10,000).
- 3. Respondent shall make one payment to the "Indiana State Ethics Commission" in the full amount of ten thousand dollars (\$10,000) within sixty (60) days from the date that the Commission accepts this agreement.
- 4. The State Ethics Commission (Commission) will not impose any further penalties under Ind. Code § 4-2-6-12.
- 5. The parties acknowledge that this agreement reflects the entire agreement between the parties, that approval of these terms by the Commission shall result in the final disposition of this proceeding, and that Respondent is waiving an alternative statutory right to a public hearing as provided in Ind. Code § 4-2-6-4 to contest the complaint.

Dated thils /8/2025 of December, 2025.

0 1 7

Jennifer-Ruth Green, Respondent

Jared Prentice, Inspector General

Elaine Vullmahn, Chief Counsel, Enforcement

Indiana Office of Inspector General

Docusign Envelope ID: CC9964F0-31C4-487E-BF90-6885B36B9D9C

| Approved this day of to       | , 2025, by the State Ethics Commission in a |
|-------------------------------|---|
|                               | <u>—</u> ·                                  |
|                               |   |
| State Ethics Commission Chair |   |

| STATE OF INDIANA | )          | INDIANA STATE ETHICS COMMISSION |
|------------------|------------|---------------------------------|
| COUNTY OF MARION | ) SS:<br>) | CASE NO.: 2025-03-0077          |
|                  |            |                                 |

IN THE MATTER OF JENNIFER-RUTH GREEN RESPONDENT

#### FINAL REPORT OF THE INDIANA STATE ETHICS COMMISSION

The Indiana State Ethics Commission hereby reports its findings of fact, conclusions of law, and sanctions in the above captioned matter.

#### FINDINGS OF FACT

- Jennifer-Ruth Green, Respondent, and the Inspector General, by Counsel Elaine Vullmahn, entered into an Agreed Settlement which the Commission accepted during their December 18, 2025, meeting.
- 2. Pursuant to the Agreed Settlement, Respondent admitted to a violation of 42 IAC 1-5-4, the political activity rule and Ind. Code § 4-2-6-17, the use of state property rule, found in the Indiana Code of Ethics.
- 3. Pursuant to the Agreed Settlement, Respondent admitted to the facts alleged in paragraph 3 and 10 in the Ethics Complaint filed by the OIG on September 12, 2025. As such, Respondent admitted that she violated 42 IAC 1-5-4, the political activity rule, when she had state employees generate content and proofread posts made to the "Elect Jennifer-Ruth Green" Facebook account. Respondent also admitted that she violated Ind. Code § 4-2-6-17, the use of state property rule, when she used, and required a state employee to use, Respondent's assigned state vehicle in the performance of Respondent's personal tasks.

#### **CONCLUSIONS OF LAW**

Said conduct, admitted and acknowledged by Respondent, constitutes a violation of 42 IAC 1-5-4 and Ind. Code § 4-2-6-17, as described above.

#### **SANCTIONS**

 The Commission imposes a fine to be paid by Respondent in the amount of \$10,000 to the "Indiana State Ethics Commission" within 60 days from
 December 18, 2025, the date that the Commission approved the Agreement.

| Approved on December 18, 2025. |                                   |
|--------------------------------|-----------------------------------|
| Katherine J. Noel, Chair       | Corinne R. Finnerty, Commissioner |
| Sue Anne Gilroy, Commissioner  | Rafael Sanchez, Commissioner      |
| Robert Duncan, Commissioner    |                                   |