

INDIANA STATE ETHICS COMMISSION

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

July 10, 2025

10:00 a.m.

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

| Commission Member | Term Began | Term Ends | Appointing Authority |
|-----------------------|-----------------|-------------------|----------------------|
| 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 June 12, 2025

III. Consideration of Post-Employment Waivers

a. Indiana Department of Health – Amy Kent; Presented by Dr. Lindsay Weaver

b. Indiana Commission for Higher Education – Greg Harrell; Presented by CHE

COO Michelle Ashcraft

IV. Consideration of Final Report

a. In Re Kurt Bensheimer – 2024-03-0090

V. State Ethics Commission Director's Report

[Join the meeting via livestream here](#)

(https://teams.microsoft.com/dl/launcher/launcher.html?url=%2F_%23%2F1%2Fmeetup-join%2F19%3Ameeting_Yjg0NWY0OTctODI1Yi00ODhiLWl3MjUjNTUwZGU4YWM2NDM4%40thread.v2%2F0%3Fcontext%3D%257b%2522Id%2522%253a%2522199bfa-a409-4f13-b0c4-18b45933d88d%2522%252c%2522Oid%2522%253a%2522b97cc08d-0b9a-473a-be07-5569c824969e%2522%257d%26anon%3Dtrue&type=meetup-join&deeplinkId=eb03ba11-8703-4dbe-89ca-0bf828854a76&directDI=true&msLaunch=true&enableMobilePage=true&suppressPrompt=true)

INDIANA
STATE ETHICS COMMISSION

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

Minutes of the
Indiana State Ethics Commission
June 12, 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 Ann Gilroy
Robert Duncan
Rafael Sanchez
Corinne Finnerty

OIG Members Present:

Regan Perrodin, State Ethics Commission Director
Adam Garrigus
Teresa Henson
Jared Prentice
Tiffany Mulligan
Elaine Vullmahn
Will Deane
JJ Fajt
Samuel Stearley
Mark Day
Mike Lepper

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 Sanchez seconded.

Approved: 5-0

III. Approval of Minutes from May 8, 2025

Approval of minutes of May 8, 2025. Commissioner Sanchez made a motion to approve the minutes. Commissioner Duncan seconded.

Approved: 5-0

IV. Consideration of Post-Employment Waivers

- a. Consideration of Post-Employment Waiver for:
Indiana Commission for Higher Education – Seth Hinshaw
Presented by Office of Education Chief of Staff Josh Garrison

Seth Hinshaw and Josh Garrison were present and both were sworn in.

The Secretary of Education, Katie Jenner, could not be here today and designated Chief of Staff Josh Garrison to present the waiver which waives the cooling off period relating to contracting and the particular matter restriction.

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

Approved: 5-0

- b. Consideration of Post-Employment Waiver for:
Indiana Department of Workforce Development – Megan Hibbard
Presented by Ethics Officer Amie Durfee

Amie Durfee was present, Megan Hibbard appeared remotely, and both were sworn in.

DWD Commissioner Josh Richardson could not be here today and designated Ethics Officer Amie Durfee to present the waiver which waives the particular matter restriction and the cooling off period.

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

Approved: 5-0

- c. Consideration of Post-Employment Waiver for:
Indiana Department of Labor – Jameson Berry
Presented by Ethics Officer Tony Hardman

Jameson Berry and Tony Hardman were present and both were sworn in.

Secretary Mike Speedy could not be here today and designated Ethics Officer Tony Hardman to present the waiver which waives the cooling off period related to regulatory and licensing decisions.

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

Approved: 5-0

- d. Consideration of Post-Employment Waiver for:
Indiana Economic Development Corporation – Robert Paglia
Presented by IEDC Chief of Staff Becky Yuan

Robert Paglia and Becky Yuan were present and both were sworn in.

The Secretary of Commerce, David Adams, could not be here today and designated Chief of Staff Becky Yuan to present the waiver which waives the cooling off period related to contracting.

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

Approved: 5-0

V. Consideration of Motion
In the Matter of Kurt Bensheimer
Case No. 2024-03-0090

Will Deane presented the Joint Motion to Vacate Public Hearing and Consideration of Settlement Agreement in this matter to the Commission for their approval.

Commissioner Sanchez made a motion to approve. Commissioner Finnerty seconded.

Approved: 5-0

VI. Consideration of Final Report
In the Matter of Rebecca Honn
Case No. 2024-01-0030

Regan Perrodin presented the final report on the matter to the Commission for their approval.

Commissioner Noel made a motion to approve. Commissioner Sanchez seconded.

Approved: 5-0

VII. State Ethics Commission Director's Report

- a. The Civil Penalties rule has been approved by the Attorney General's Office and the Governor; the rule was published on June 4th, 2025, and is now in effect.
- b. The Auditor & Investigator conference is being held today, June 12th, 2025. It will be held in the auditorium of the Southern Government building from 1:00 to 4:30.
- c. 21 IAOs since the last meeting, most concerning post-employment and moonlighting.
- d. OIG staff assistance – Regan Perrodin and Adam Garrigus aided in administration for the Commission
- e. An executive session will occur immediately after this meeting ends.

VIII. Adjournment

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

Approved: 5-0

The meeting adjourned at approximately 10:30 a.m.



Mike Braun
Governor

Lindsay M. Weaver, MD, FACEP
State Health Commissioner

June 30, 2025

Indiana State Ethics Commission
Office of the Inspector General
315 West Ohio Street, Room 104
Indianapolis, IN 46202

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

Indiana State Ethics Commission,

As the Appointing Authority of Indiana Department of Health, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Amy Kent in her post-employment with the Bose Public Affairs Group.

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.

- A. 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.

To **promote**, **protect**, and **improve** the health and safety of all Hoosiers.



☐ 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. *(Please provide a brief description of the specific particular matter(s) to which this waiver applies below):*

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 Deputy Health Commissioner and Chief of Staff, Amy Kent signed on average 60 contracts, grants, and amendments each year for the programs within her vertical (legal, data, technology, staff development, quality improvement, health care regulation) based on recommendations of managers and key staff. Ms. Kent's primary role in these contracts was to ensure that procurement policies, laws, and financial procedures were followed and she'd rarely sole administrator these contracts in her role. No regulatory or policy action in which Ms. Kent was involved during his time at IDOH are implicated in this engagement with Bose Public Affairs Group (Bose). As Chief of Staff, Ms. Kent also oversees the position of Legislative and External Affairs for IDOH. In this role, Ms. Kent supervises the IDOH employee who directs IDOH advocacy to the Indiana Legislature and maintains contact with constituents and stakeholders when they contact IDOH for assistance.

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

Ms. Kent will serve Bose in the position of Vice President. The Vice President position with Bose Public Affairs Group provides government relations and public affairs expertise to Bose's clients. This may include advising clients on partnership opportunities and procurement with government entities and engaging with government officials or legislators to advocate for client interests. Job duties may also entail meeting with legislators, executive branch representatives, and their staff on a variety of policy matters.



Ms. Kent will provide services to a variety of clients at Bose including those in health care and health and human services sectors.

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:

Bose does have clients that may require substantial contact with IDOH in the future. However, Ms. Kent has informed Bose that she may not have contact with IDOH during the initial 365 days in order to comply with the ethics rule on post-employment. Bose has agreed that for any projects or clients that would require contact with IDOH, another employee at Bose would separately handle any outreach to IDOH. She will not be contacting IDOH to discuss matters that she has worked on in her role at IDOH on behalf of Bose. A requirement of the position at Bose is compliance with all federal, state, and local ethics regulations including the proper registration and reporting to the Indiana Lobby Registration Commission and the Indiana Department of Administration.

Ms. Kent is aware of the importance of the 365 post-employment restrictions and will not have professional contact with IDOH during this time period. She understands that such contact on behalf of Bose or its clients would be a violation. Both Bose and IDOH are aware of these restrictions.

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:

Bose has many clients in the health care and health and human services sector, as well as clients from local municipalities and government entities from various regions of the state. These clients will need to approach the state legislature to advocate for amendments and improvements to the law to address their needs. In her role at IDOH, Ms. Kent has had experience communicating and advocating for change that benefits local government by working with local health departments. She has also worked closely with several stakeholders in the health care sector in various roles she has served within IDOH. In addition, she has served as a liaison and partner with the other health and human services state agencies, including the Family and Social Services Administration and the Department of Child Services. Ms. Kent's knowledge and expertise will be a valuable resource as an advocate for public interest in this area.



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

Denial of a waiver would present a substantial economic hardship. Ms. Kent's prospective position with Bose offers her the opportunity for professional growth and valuable experience. There are currently no advancement opportunities at the Department that would offer similar growth or experience. Additionally, a denial would limit Ms. Kent's future earning potential and the opportunities that would afford her family.

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.

6/30/25

Lindsay Weaver, MD, FACEP

DATE

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).

6/30/25

Erin R. Elam, JD

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

IC 4-2-6-11

Post-employment waiver

As the Appointing Authority of the Indiana Commission for Higher Education, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Greg Harrell in his post-employment with the Institute for Quality Education.

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.

- A. 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. *(Please provide a brief description of the specific particular matter(s) to which this waiver applies below):*

- 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:

Greg Harrell currently serves as the Assistant Commissioner for Public Policy & Strategic Partnerships at the Indiana Commission for Higher Education (Commission). In his role, he coordinates the agency's public policy efforts in which he regularly interfaces with members of the Indiana General Assembly, higher education institutions, and workforce-focused state agencies. Mr. Harrell's role also involves leading the implementation of new policies, programs, and partnerships created by legislation or Executive Orders that impact the Commission.

Mr. Harrell does have decision-making authority over several contracts and agreements where he is responsible for negotiations, overseeing the selection process, and serving as the primary point of contact. However, he does not have signatory authority.

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

As Executive Director of Policy & Government Affairs at the Institute for Quality Education Mr. Harrell would be responsible for developing and advocating for legislative and policy solutions to improve the quality of K-12 education for Hoosier students and families. Mr. Harrell would regularly interact with key organizations and stakeholders, including, but not limited to, state lawmakers, policymakers, the Office of Education established by Executive Order 25-07, the Indiana State Board of Education, Indiana Department of Education, and the Indiana Charter School Board.

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:

It is unlikely that Mr. Harrell's prospective employment would involve substantial contact with the Commission. The Commission is a coordinating agency for higher education and administers the state's financial aid programs, whereas the Institute for Quality Education advocates for K-12 policies which advance the quality of education for all students. Moreover, the Commission does not have any active contracts or grant agreements with the Institute for Quality Education. The state agencies with which Mr. Harrell would have substantial contact in his prospective employment role will be K-12-centric, not in higher education, including, but not limited to, the Office of Education established by Executive Order 25-07, the Indiana State Board of Education, Indiana Department of Education, and the Indiana Charter School Board.

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:

Mr. Harrell's prospective employment is beneficial to both the state and the public. In his current position, Mr. Harrell has coordinated and implemented public policy efforts that have increased postsecondary access, affordability, and attainment for Indiana residents. The state has been recognized as a national leader in these areas during Mr. Harrell's tenure. Having Mr. Harrell lead efforts at the Institute for Quality Education to increase and improve educational options for Hoosier families would be invaluable due to Mr. Harrell's experience in state government and deep understanding of issues impacting Indiana's educational landscape.

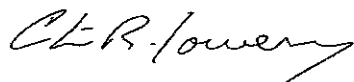
5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

Denying this post-employment waiver would present an economic hardship for Mr. Harrell as he would not have the opportunity to further his career. He is a skilled professional and has contributed greatly to the State of Indiana during his nearly ten-year tenure at the Commission. A role at the Institute for Quality Education in which he will lead public policy and government affairs will provide him with more opportunities to grow than are available at the Commission.

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.



Chris Lowery, as Appointing Authority
Commissioner for Higher Education

July 3, 2025

DATE

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).



Dr. Matthew Butler,
Commission for Higher Education

July 3, 2025

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.*



INDIANA COMMISSION ^{for}
HIGHER EDUCATION

July 7, 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 Higher Education and the appointing authority for the staff of the Indiana Commission for Higher Education, including my Assistant Commissioner for Public Policy and Strategic Partnerships, Mr. Greg Harrell. I have submitted a post-employment waiver for Mr. Harrell for your consideration.

Since I will be unable to attend the State Ethics Commission's meeting on Thursday, July 10, 2025, I hereby designate Ms. Michelle Ashcraft, Senior Associate Commissioner and Chief Operating Officer at the Indiana Commission for Higher Education, to present the above-referenced waiver on my behalf. Please feel free to direct any questions concerning the filing to Ms. Ashcraft.

Thank you for your consideration of this waiver request.

Sincerely,

Chris Lowery,
Commissioner for Higher Education

STATE OF INDIANA) INDIANA STATE ETHICS COMMISSION
) SS:
COUNTY OF MARION) CASE NO.: 2024-03-0090

IN THE MATTER OF KURT BENSHEIMER

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

1. Kurt Bensheimer, Respondent, and the Inspector General, by Counsel Will Deane, entered into an Agreed Settlement which the Commission accepted during their June 12, 2025, meeting.
2. Pursuant to the Agreed Settlement, Respondent admitted a violation of 42 IAC 1-5-1, the Gifts Rule found in the Indiana Code of Ethics.
3. Pursuant to the Agreed Settlement, Respondent admitted to the facts as alleged in the Complaint filed by the Inspector General in this matter on May 12, 2025. As such, Respondent admitted that he accepted full compensation of airfare and hotel expenses for a trip to Stockholm, Sweden from Micro Systemation AB, a company with which the Indiana Department of Correction, the agency for which Respondent was an employee, had a business relationship at the time of the acceptance of the compensation.

CONCLUSIONS OF LAW

Said conduct, admitted and acknowledged by Respondent, constitutes a violation of 42 IAC 1-5-1.

SANCTIONS

1. The Commission imposes a fine to be paid by Respondent in the amount of \$1,867.07 to the “Indiana State Ethics Commission” within 60 days from June 12, 2025, the date that the Commission approved the Agreement.

Approved on July 10, 2025.

Katherine J. Noel, Chair

Corinne R. Finnerty, Commissioner

Sue Anne Gilroy, Commissioner

Rafael Sanchez, Commissioner

Robert Duncan, Commissioner