



FILED

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

DEC 18 2025

INDIANA STATE
ETHICS COMMISSION

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.

- 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:**

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

12/11/25

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).



Stephanie Flittner, General Counsel & Ethics Officer

12/11/25

DATE

D. Approval by State Ethics Commission

FOR OFFICE USE ONLY

Approved by State Ethics Commission



Katherine Noel, Chair, State Ethics Commission

12-18-25

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 Department
of Natural Resources

Mike Braun, Governor
Alan Morrison, Director

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,

A handwritten signature in black ink, appearing to read "Alan Morrison", is written over a horizontal line.

Alan Morrison, Director
Indiana Department of Natural Resources