



ETHICS DISCLOSURE STATEMENT
CONFLICTS OF INTEREST – DECISIONS AND VOTING
State Form 55860 (R / 10-15)
OFFICE OF THE INSPECTOR GENERAL
IC 4-2-6-9

FILED

NOV 5 2025

**INDIANA STATE
ETHICS COMMISSION**

In accordance with IC 4-2-6-9, you must file your disclosure with the State Ethics Commission no later than seven (7) days after the conduct that gives rise to the conflict. You must also include a copy of the notification provided to your agency appointing authority and ethics officer when filing this disclosure. This disclosure will be posted on the Inspector General's website.

Name (last) Gaddis	Name (first) Kyle	Name (middle) David
Name of office or agency Indiana Economic Development Corporation (IEDC)		Job title VP, Account Management
Address of office (number and street) 1 N. Capitol Avenue Suite 700		City Indianapolis
Office telephone number (317) 232-8800		ZIP code 46204
Office e-mail address (required) kgaddis@iedc.in.gov		

Describe the conflict of interest:

Mr. Gaddis is currently engaged in conversations with McGuire Sponsel (hereinafter, "MS") for a potential employment opportunity. Pursuant to statute, the IEDC operates economic development tax credit programs and enters into tax credit agreements with companies throughout the state are awarded tax credits under an applicable tax credit program. While the determination of whether to award tax credits to companies is made by a different division within the IEDC, all tax credit agreements are administered by the team that reports to Mr. Gaddis

MS currently has active tax credit agreements with the IEDC. Administration matters related to the tax credit agreements are handled by the Account Management Team that reports to Mr. Gaddis. Mr. Gaddis has not participated in any decision, vote, or matter related to the active tax credit incentive agreements between the IEDC and MS. Out of an abundance of caution and in the interest of transparency, Mr. Gaddis is filing this disclosure as a potential conflict of interest requiring an ethical screen and disclosure.

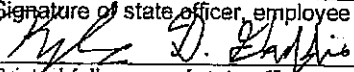
Describe the screen established by your ethics officer. (Attach additional pages as needed.)

The potential conflict will be logged into the IEDC's Customer Relationship Database, which is used to identify potential conflicts of interest. Mr. Gaddis will be screened from all decisions and votes, including any contracts and/or amendments, as well as any administrative and compliance matters in which MS may have a financial interest. In the event a matter requires escalation from the Account Management Team, it will be handled directly by the IEDC's Chief Operating Officer and Mr. Gaddis will be completely screened from the matter. Pursuant to IC 5-14-3-10, Mr. Gaddis shall not disclose or otherwise rely upon information classified as confidential under IC 5-14-4-3. This restriction applies in perpetuity, so long as the subject information is deemed confidential.

AFFIRMATION

Your signature below affirms that your disclosures on this form are true, complete, and correct to the best of your knowledge and belief. In addition to this form, you have attached a copy of your written disclosure to your agency appointing authority and ethics officer.

Signature of state officer, employee or special state appointee



Date signed (month, day, year)

9/29/2025

Printed full name of state officer, employee or special state appointee

Kyle D. Gaddis

FOR ETHICS OFFICER USE ONLY

Your signature below affirms that you have reviewed this disclosure form and that it is true, complete, and correct to the best of your knowledge and belief. I have implemented the screen described above.

Signature of ethics officer



Date signed (month, day, year)

11/04/2025

Printed full name of ethics officer

Alison Grand, Chief Administrative Officer and Ethics Officer

From: Gaddis, Kyle (IEDC)
Sent: Monday, September 29, 2025 4:21 PM
To: Adams, David
Cc: Yuan, Becky; Daniel, Michael
Subject: Gaddis - Post Employment Consideration
Attachments: Gaddis - 4-2-6-9 Decisions_Votes Filing (pending).pdf

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INDIANA STATE
ETHICS COMMISSION

Secretary Adams,

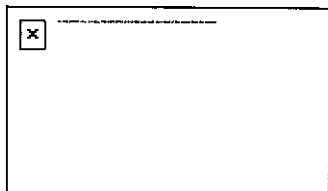
I'm reaching out to inform you about a potential post-employment opportunity I am exploring with McGuire Sponsel LLC ("MS") and to respectfully request your consideration for a post-employment waiver.

As MS has active tax incentive agreements with the IEDC, I requested an Informal Advisory Opinion from the Inspector General for guidance on any post-employment considerations I may be subject to. Pursuant to that opinion, I received advice which I have summarized below:

- Disclosure Filing: I should file a 4-2-6-9 Disclosure with the Inspector General's Office as soon as we're able that describes the possible conflict and details the screen that will be in place to ensure I do not participate in any decision, vote, or matter that MS may have a financial interest in. To that end, I have attached a draft disclosure that details the potential conflict and the requirement that I be screened from any matter for MS, which otherwise must go directly to Mike as my supervisor.
 - o Next Steps: As this document requires a signature of the IEDC's Ethics Officer and my current role includes serving as the acting Ethics Officer, a new Ethics Officer will need to be appointed (even if temporary). In the alternative, you could sign the disclosure as the Appointing Authority for the IEDC. I have attached a partially executed disclosure for consideration. If the signatory changes and an Ethics Officer is named, I can certainly make that change and resend.
- Post-Employment Waiver: Accepting a position with MS may trigger the 365-day cooling off period and a post-employment waiver would need to be received prior to starting employment with MS.
 - o Next Steps: I would respectfully request for your approval, as the Appointing Authority for the IEDC, to have a post-employment waiver be considered at the next meeting of the State Ethics Commission on 10/9/25 at 10 am. As the deadline is today for submittal to be on the agenda, I have asked for and received additional time to submit the post-employment waiver to COB on 10/2 (Thursday). I can assist in providing information to get the draft of the waiver completed.
 - o The Appointing Authority or designee would appear with me at the State Ethics Commission Meeting. I have discussed with Mike and he is willing to attend if that is the preference.
 - o Similar to the above, the Inspector General recommends a new or interim Ethics Officer be appointed (even temporarily) prior to the filing of my post-employment waiver to avoid any appearance of conflict (i.e. the ethics officer approving his own post-employment waiver & disclosure). Please let me know how I can help in this process. I also discussed this with Mike earlier today and our initial thought is Ryan Locke, as another experienced attorney at the IEDC, may be able to step into the role temporarily.

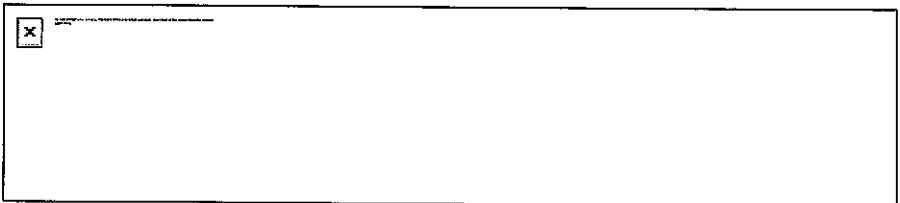
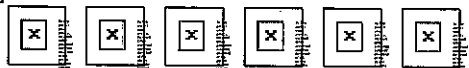
I appreciate your consideration. Please let me know if you have any questions and how I can assist.

Thank you,
Kyle



Kyle Gaddis

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