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SEP 25 2026



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

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) Goodrich	Name (first) Chuck	Name (middle)
Name of office or agency Office of the Governor		Job title Secretary of Commerce
Address of office (number and street) 200 West Washing Street, Room 206		City Indianapolis
Office telephone number (317) 232-4567		Office e-mail address (required) CGoodrich@gov.IN.gov

Describe the conflict of interest:

This Ethics Disclosure Statement documents the potential conflict of interests that Secretary of Commerce Chuck Goodrich has as senior executive of Gaylor Electric, Inc. and accompanying screening processes in place. The attached disclosure and screening document was executed in June 2026, prior to Mr. Goodrich's appointment as Secretary of Commerce.

Through an administrative oversight, the executed document was not filed with the State Ethics Commission after his appointment as intended and outlined in Part III A. This filing is intended to correct this oversight and provide the intended transparency to the Commission and the public.

See attached document.

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

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)

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

Chuck Goodrich

9/29/26

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. You also attest that your agency has implemented the screen described above.

Signature of ethics officer

Date signed (month, day, year)

Printed full name of ethics officer

Stephanie Flitner

SEPT 23, 2026

Information Barriers and Screening Procedures for Secretary of Commerce Chuck Goodrich

Purpose and Authority

On May 4, 2026, Indiana Inspector General Jared Prentice issued an informal advisory opinion in response to a request submitted on behalf of Charles “Chuck” Goodrich, addressing whether the Indiana Code of Ethics permits Mr. Goodrich to serve as Secretary of Commerce while retaining his senior executive position and ownership stake at Gaylor Electric, Inc. The opinion concluded that the Code of Ethics does not per se prohibit such dual service, provided that: (i) dual screens (one within State government and one within Gaylor Electric) are implemented and rigorously maintained; (ii) timely disclosures are filed under IC 4-2-6-9 and IC 4-2-6-10.5; (iii) clear and documented procedures are established for anticipated contract scenarios; and (iv) strict separation of state resources, time, and confidential information is observed.

These Information Barriers and Screening Procedures (“Screens”) are established in accordance with the Inspector General’s opinion and informed by its four-phase compliance roadmap. The Screens are designed to ensure that Mr. Goodrich’s dual service complies with IC 4-2-6-5.5 (outside employment), IC 4-2-6-9 (conflicts of interest, including decisions and votes), IC 4-2-6-10.5 (financial interest in state contracts), IC 4-2-6-17 (use of state property), 42 IAC 1-5-13 (ghost employment), and IC 4-2-6-6, 42 IAC 1-5-10, and 42 IAC 1-5-11 (confidential information).

Definitions

For purposes of these Screens:

“Gaylor Entities” means Gaylor Electric, Inc., its subsidiaries, and these related entities: Gaylor Real Estate LLC, Gaylor Real Estate Fishers LLC, Gaylor Real Estate Carolina LLC, Gaylor Real Estate Lebanon LLC, and Gaylor Real Estate Lafayette LLC.

“Gaylor-Related Matter” means any grant, incentive, regulatory decision, contract, procurement, workforce program, infrastructure project, economic development initiative, or other particular matter in which any of the Gaylor Entities has a vested financial interest.

“Commerce Vertical” means all agencies under the Secretary of Commerce’s oversight, including the Indiana Economic Development Corporation, the Department of Workforce Development, the Governor’s Workforce Cabinet, the Indiana Destination Development Corporation, the Indiana Arts Commission, the Indiana State Fair, and the Ports of Indiana.

“State Ethics Officer” means the General Counsel for the Governor’s Office.

“Knowledge” means actual knowledge, or knowledge imputed by reckless disregard or deliberate ignorance of facts indicating a conflict; it does not include inadvertence or unwitting lack of knowledge. Proceeding without such Knowledge does not, by itself, constitute a violation of these Screens.

"Financial Interest" has the meaning set forth in IC 4-2-6-1, and includes any interest arising from Mr. Goodrich's employment, executive position, or ownership stake in any Gaylor Entity. Because Gaylor Electric is rarely, if ever, in direct contract with the State of Indiana and instead typically serves as a subcontractor to general contractors whose clients or projects may be recipients of State incentives, the financial interest analysis must account for financial interests that actually flow through subcontracting arrangements.

Compensation and Work Expectations

Mr. Goodrich has agreed to serve as Secretary of Commerce for the State of Indiana at an annual salary of One Dollar (\$1.00) for the duration of his appointment. Throughout the term of his service, Mr. Goodrich will be classified as a full-time employee. The parties acknowledge and agree that the duties and responsibilities attendant to the position of Secretary of Commerce necessitate the maintenance of a non-traditional work schedule and require frequent travel, including travel beyond the geographic boundaries of the State of Indiana. In recognition of the unique character and demands of the office, the parties further acknowledge that the remote work provisions set forth in Executive Order 25-16 should not be construed to restrict the Secretary of Commerce from performing his official duties at any location, whether within or outside the State of Indiana, and irrespective of whether such activities occur during or outside of regularly scheduled working hours.

Part I: State-Side Screen

A. General Prohibition on Participation

Mr. Goodrich shall not participate in, or attempt to influence, any Gaylor-Related Matter that comes before any agency within the Commerce Vertical. The screening obligation and recusal requirements under this Part I are triggered when Mr. Goodrich has Knowledge of a Gaylor-Related Matter or other covered conflict. This participation prohibition encompasses decisions, votes, recommendations, discussions, or matters relating to any decision or vote in which any Gaylor Entity holds a direct financial interest. For the avoidance of doubt, the mere pursuit of business opportunities, submission of bids, or expression of interest by a Gaylor Entity in a potential subcontracting arrangement shall not, standing alone, constitute the type of financial interest sufficient to trigger Mr. Goodrich's screening obligation under this provision. If information later reveals a conflict that was not known at the time of participation, Mr. Goodrich shall promptly notify the State Ethics Officer and implement recusal going forward; no removal is warranted based solely on prior inadvertent participation without Knowledge.

The screening obligation is triggered only when a Gaylor Entity has entered into a signed subcontracting agreement, or a written commitment that is substantially equivalent thereto, such that the Gaylor Entity's financial interests as a subcontractor would be directly affected by a decision or vote targeting the relevant project, prime contractor, or program.

B. Designation of Screening Personnel

The State Ethics Officer shall serve as the monitor responsible for ensuring compliance with these Screens. A designated alternate decision-maker within the Commerce Vertical (or, where appropriate, the relevant agency head) shall be assigned responsibility for all Gaylor-Related Matters for which recusal or screening is necessary. Staff within the Commerce Vertical shall be notified that they may not discuss, present, or transmit information regarding Gaylor-Related Matters to or in the presence of Secretary Goodrich.

C. Notification and Identification Protocol

Each agency within the Commerce Vertical shall establish a process to identify incoming matters involving any Gaylor Entity at the earliest practicable stage. Because Gaylor Electric typically operates as a subcontractor to general contractors rather than as a direct contracting party with the State, and because Gaylor Electric does not always know when businesses for which it performs work may be recipients of State incentives, agencies shall take reasonable steps to identify not only direct Gaylor contracts but also projects, grants, or incentive recipients for which a Gaylor Entity is known to be performing subcontract work. Upon identification of a Gaylor-Related Matter, the relevant agency ethics officer or general counsel shall notify the State Ethics Officer, who shall confirm activation of the screening protocol and ensure that the matter is routed to the designated alternate decision-maker without substantive details being communicated to Secretary Goodrich. Secretary Goodrich may be notified of the existence of a Gaylor-Related Matter for the sole purpose of confirming recusal.

Because Gaylor Electric may not in every instance be aware that a business it serves as a subcontractor is a recipient of State incentives, the Company-Side Screen Coordinator (see Part II.B) shall establish a process by which Gaylor Electric periodically reviews its active and

prospective subcontract engagements to determine whether any involve projects or businesses receiving incentives, grants, or contracts from agencies within the Commerce Vertical. If such a connection is identified, the Company-Side Screen Coordinator shall promptly notify the State Ethics Officer so that the State-Side Screen may be activated with respect to any related matter.

D. Documentation of Recusals

Each instance of recusal shall be documented in writing, including the date, the nature of the matter (in general terms), the identity of the alternate decision-maker, and confirmation that the Screen was activated. Such documentation shall be maintained by the State Ethics Officer.

E. Prohibition on Use of State Resources

Secretary Goodrich shall not use state equipment, personnel, facilities, time, or other state resources for any purpose related to his Gaylor Electric responsibilities, board service, or any other private business activity. All communications and decision-making related to Gaylor Electric shall be conducted outside of state government working hours and without the use of state-issued devices, email accounts, or other state property.

F. Prohibition on Ghost Employment

Secretary Goodrich shall not perform work on behalf of Gaylor Electric or any other outside entity during his state government working hours, unless otherwise permitted by written agency policy, consistent with 42 IAC 1-5-13. His schedules and communications shall attempt to separate state responsibilities from any Gaylor Electric or board-related service, understanding that inadvertent overlap may occurred and should be remedied immediately upon identification.

Part II: Company-Side Screen

A. General Prohibition on State-Related Communications

Gaylor Electric shall institute a formal screen ensuring that no Gaylor personnel, officers, directors, or agents raise, discuss, or communicate with Secretary Goodrich any state programs, grants, contracts, applications, incentives, regulatory matters, or procurement matters involving any agency within the Commerce Vertical or any other State of Indiana agency.

Gaylor Electric's screening obligations under this Part II apply when the Company has Knowledge of a State-related conflict. If the Company later discovers a conflict that was not known at the time of communication or action, it must cease further interaction on the covered matter and route it to be included in the Screen; no disciplinary action should be taken based solely on inadvertent, unwitting conduct.

B. Designation of Company-Side Screen Coordinator

Gaylor Electric's Senior Leadership Team shall designate a compliance coordinator responsible for monitoring and enforcing the Company-Side Screen. The compliance coordinator shall ensure that all Gaylor personnel are informed of the Screen's requirements and that no reverse flow of information regarding State matters reaches Secretary Goodrich.

The compliance coordinator shall also maintain an ongoing process to monitor Gaylor Electric's active signed subcontract engagements to determine whether any involve projects or businesses receiving incentives, grants, or contracts from agencies within the Commerce Vertical or other State agencies. Because Gaylor Electric does not always know when its general contractor clients or project owners are recipients of State incentives, the compliance coordinator shall make reasonable inquiries of general contractors and public news sources, where practicable, to identify any State incentive nexus and shall promptly notify the State Ethics Officer upon discovery of any such connection.

C. Delegation of State-Facing Business

All communications, applications, proposals, and negotiations between a Gaylor Entity and the State of Indiana shall be conducted exclusively by members of Gaylor's Senior Leadership Team or their designees, without the involvement of Secretary Goodrich. Secretary Goodrich acknowledges that while he will fully recuse himself from such matters, Gaylor Electric's Senior Leadership Team retains a fiduciary responsibility to shareholders and stakeholders to pursue business opportunities, including those connected to government activities or funding. Nothing in this screening arrangement shall be interpreted as preventing Gaylor Entities from pursuing all available economic opportunities.

D. Confidential Information Barrier

No confidential State information obtained by Secretary Goodrich through his state employment shall be shared with or disclosed to any Gaylor Entity, its personnel, agents, or representatives. Conversely, no confidential Gaylor business information relating to pending or prospective State business shall be communicated to Secretary Goodrich in a manner that could compromise the integrity of State decision-making.

Part III: Disclosure Obligations

A. Initial Disclosure Under IC 4-2-6-9(b)(2)

Upon appointment, Secretary Goodrich shall file an initial written disclosure with the Indiana State Ethics Commission pursuant to IC 4-2-6-9(b)(2), identifying his senior executive role at Gaylor Electric, his financial interest in the Gaylor Entities, and a summary of the dual screening procedures established herein. The disclosure shall be signed by Secretary Goodrich, the State Ethics Officer, and the Indiana Inspector General and shall include a copy of the disclosure provided to the appointing authority (i.e., the Governor).

B. Supplemental Disclosures for Specific Matters

When a specific conflicting Gaylor-Related Matter arises before any agency in the Commerce Vertical, Secretary Goodrich shall file a supplemental disclosure with the Indiana State Ethics Commission identifying the particular matter, not later than seven (7) days after the conduct giving rise to the conflict. Each supplemental disclosure shall generally describe the conflict of interest, describe and affirm the implementation of the expanded screen, be signed by both Secretary Goodrich and the State Ethics Officer, include a copy of the disclosure provided to the appointing authority.

C. Contract-Specific Disclosures Under IC 4-2-6-10.5

If any State agency considers entering into a contract with a Gaylor Entity in which Secretary Goodrich has a financial interest, Secretary Goodrich must, before the contract is executed, file a written statement with the Inspector General under IC 4-2-6-10.5(b)(2). Such written statement must include an affirmation that Secretary Goodrich does not participate in or have contracting responsibility for the contracting agency with respect to that contract, an affirmation regarding whether the contract was made after public notice and, if applicable, through competitive bidding, full disclosure of all related financial interests in the contract, and a statement indicating that the contract can be performed without compromising the performance of his official duties.

Because Gaylor Electric is rarely, if ever, in direct contract with the State of Indiana, the more common scenario implicating IC 4-2-6-10.5 will arise when a State agency enters into a contract with an incentive recipient, and a Gaylor Entity performs subcontract work on the resulting project for the general contractor that has the contractual relationship with the incentive recipient. In such cases, the State Ethics Officer shall evaluate whether Secretary Goodrich's executive role and ownership stake in the Gaylor Entity constitutes a "financial interest" in the State contract within the meaning of IC 4-2-6-10.5(a). If it does, the disclosure obligation applies.

Secretary Goodrich shall work with the State Ethics Officer and Gaylor Electric to determine whether disclosure is the appropriate path for each such contract or subcontract arrangement. Because Gaylor Electric does not always know when its clients or general contractors are recipients of State incentives, the Company-Side Screen Coordinator shall maintain ongoing monitoring procedures as described in Part II to identify such connections at the earliest possible stage.

Part IV: Board Service

A. Paid Board Positions

The outside employment rule under IC 4-2-6-5.5 applies to all paid board positions held by Secretary Goodrich. For any compensated board role, Secretary Goodrich must ensure the duties do not impair his independence of judgment, must disclose and avoid any incompatibility, and must not use state resources for any board-related duties.

B. Unpaid Board Positions

Unpaid board service does not constitute "outside employment" under IC 4-2-6-5.5, but may still require screening under IC 4-2-6-9 if the entity has a financial interest in a matter before the Commerce Vertical. Secretary Goodrich must not participate in, or attempt to influence, any State decision or vote involving any board entity in which he serves, and must file a disclosure and maintain a screen whenever such matters arise.

C. Ghost Employment and State Property

The ghost employment rules and use of state property rules apply equally to all board activity, whether paid or unpaid. Secretary Goodrich may not use state resources, including staff, equipment, or state time, for any board-related duties.

D. Resignation from State Workforce Development Board and Region V Board

Secretary Goodrich shall resign from the State Workforce Development Board and the Region V Workforce Board immediately prior to assuming the Secretary of Commerce role to avoid a direct structural conflict.

Part V: Anticipated Contract Scenarios and Procedures

A. Early Identification

Each agency within the Commerce Vertical shall establish a protocol to flag, at the earliest possible stage, any procurement, solicitation, grant application, or proposed contract in which a Gaylor Entity is known to be a beneficiary, whether as a direct contractor, a subcontractor, or a downstream participant in a project funded or incentivized by the State. Given that Gaylor Electric typically operates as a subcontractor to general contractors whose clients may be recipients of State incentives, agencies should be alert to the possibility that a Gaylor Entity may have a financial interest in the outcome of a State contract or incentive even when the Gaylor Entity is not a named party to the State agreement.

B. Notification Without Substantive Disclosure

Upon identification of a potential Gaylor-Related Matter, including situations in which a Gaylor Entity is performing or may perform subcontract work on a project funded by State incentives, the agency shall notify the State Ethics Officer and Secretary Goodrich of the existence of the matter solely for the purpose of triggering the Screen and confirming recusal. Secretary Goodrich shall not receive substantive State information regarding the procurement, application, or contract terms.

C. Option for Formal Advisory Opinion

Secretary Goodrich retains the option, for any specific matter, of requesting a formal advisory opinion from the State Ethics Commission, which may make a written determination under IC 4-2-6-9(b)(1)(B) that the interest is not so substantial that it is likely to affect the integrity of the services the State expects from him.

D. Documentation

All actions taken under this Part V shall be documented, including the date of identification, the nature of the contract or matter, the compliance path selected, and confirmation of any filings made.

Part VI: Confidential Information Protections

A. Prohibition on Use or Disclosure

Secretary Goodrich shall not use, benefit from, or disclose confidential State information obtained through his state employment, consistent with IC 4-2-6-6, 42 IAC 1-5-10, and 42 IAC 1-5-11. The Screens must prevent the flow of confidential information in either direction, from the State to Gaylor Electric, and from Gaylor Electric's State-related business activities to Secretary Goodrich in his State capacity.

B. Practical Safeguards

Secretary Goodrich will take all reasonable actions to maintain separate communication channels, devices, and accounts for State business and private business. Staff within the Commerce Vertical shall be instructed that confidential information regarding pending contracts, incentives, grants, workforce programs, or economic development matters may not be shared with Secretary Goodrich when such information relates to any Gaylor Entity.

Part VII: Distribution, Training, and Enforcement

A. Safe-Harbor for Inadvertence

Actions taken without Knowledge of a conflict, and without reckless disregard or deliberate ignorance, will not be grounds for removal, discipline, or punishment under these Screens. Upon discovery, the affected parties must promptly disclose the conflict and cure the situation by recusal, re-routing, and documenting the remediation undertaken.

B. Enforcement Standard

Enforcement under these Screens is limited to instances where Knowledge exists. Training and periodic reviews should emphasize early identification of potential conflicts, but acknowledge that not all conflicts can be foreseen and that remediation, not punishment, is the default response for unwitting situations.

C. Distribution

The Screens shall be distributed to relevant personnel within the Commerce Vertical, including agency heads, general counsel, and ethics officers, as well as to Gaylor Electric's Senior Leadership Team and designated compliance coordinator.

D. Periodic Review

The State Ethics Officer and Gaylor Electric's compliance coordinator shall review these Screens no less than annually, or whenever a material change in circumstances occurs, to determine whether any modifications are appropriate.

Part VIII: Post-Employment Restrictions**A. Governing Provisions**

Upon separation from State service, Secretary Goodrich shall comply with IC 4-2-6-11, IC 4-2-6-11.5, 42 IAC 1-5-10, and 42 IAC 1-5-11, regardless of whether he returns to Gaylor Electric or assumes any other private-sector position.

B. Lobbying Restriction and Lifetime Ban

For one (1) year following separation, Secretary Goodrich shall not lobby or attempt to influence any executive-branch agency on behalf of Gaylor Electric or any other entity, except as expressly permitted by IC 4-2-6-11. Secretary Goodrich is also subject to a lifetime prohibition on participation in any particular matter in which he personally and substantially participated during his State service, whether or not the matter involves a Gaylor Entity. Gaylor Electric shall screen Secretary Goodrich from any such matter, including matters that originated during his tenure and matters Gaylor Electric engages with only after his separation.

C. 365-Day Cooling-Off Provision

The 365-day cooling-off provision under IC 4-2-6-11 would likely not apply with respect to Gaylor Electric, provided the dual screens in Parts I and II have been adequately maintained such that Secretary Goodrich did not work on Gaylor-Related Matters in his State role. Secretary Goodrich shall nonetheless consult with the State Ethics Officer and, if appropriate, the Inspector General prior to separation to confirm this determination based on the specific screening record.

D. Surviving Confidentiality Obligations

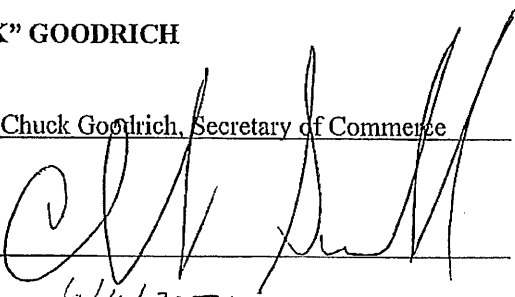
The prohibition on use or disclosure of confidential State information under 42 IAC 1-5-10 and 42 IAC 1-5-11 survives separation from State service and is not limited in duration.

E. Post-Employment Documentation

The dual screens maintained during State service are designed to minimize post-employment limitations, but some considerations may remain. The State Ethics Officer shall maintain documentation of all screening actions during Secretary Goodrich's tenure to support any post-employment analysis or waiver request (if required).

CHARLES "CHUCK" GOODRICH

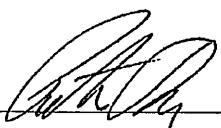
BY: Chuck Goodrich, Secretary of Commerce

SIGNATURE: 

DATE: 6/11/2026

GOVERNOR'S OFFICE

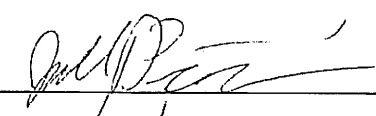
BY: Patrick Price, Ethics Officer

SIGNATURE: 

DATE: 6/15/2026

OFFICE OF INSPECTOR GENERAL

BY: Jared Prentice, Inspector General

SIGNATURE: 

DATE: 06/15/2026