

INDIANA  
STATE ETHICS COMMISSION



**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

OCT 4 2022

FILED

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) Tachtiris	Name (first) Valerie	Name (middle)	
Name of office or agency Indiana Department of Environmental Management		Job title Deputy General Counsel	
Address of office (number and street) 100 North Senate Avenue		City Indianapolis	ZIP code 46204
Office telephone number ( 317 ) 2348884	Office e-mail address (required) vtachtir@idem.in.gov		

Describe the conflict of interest:  
DGC Tachtiris's interactions with Earthjustice have been primarily through her role as a supervisor. Earthjustice sought administrative review of an air permit and an extension related to that permit issued to the Riverview Energy Corporation in Objection to the Issuance of PSD/New Source Construction and Part 70 Operating Permit No. T147-39554-0006, OEA 19-A-J-5073, and Objection to the Issuance of Permit Amendment No. 147-43258-0006, OEA A-J-5123. DGC Tachtiris served as supervisor to the attorneys who represented IDEM in those appeals, but did not appear on behalf of IDEM and did not participate directly in the litigation. Related to, but apart from, those cases, DGC Tachtiris and IDEM met with counsel for Riverview and Riverview personnel to discuss a request to extend deadlines in the appealed permit. Earthjustice sent a letter to IDEM's Commissioner related to the request for extension that DGC Tachtiris reviewed and discussed with IDEM staff. Earthjustice has also requested that EPA use its federal authority to overturn IDEM's permitting decisions related to the appealed permit. DGC Tachtiris has reviewed related documents and discussed possible responses with IDEM personnel. To her recollection, DGC Tachtiris has never had any direct contact with anyone from Earthjustice on these matters.

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

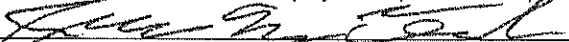
See attached screening protocol

**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)



10/4/22

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

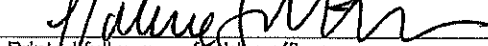
James French

**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)



10/4/2022

Printed full name of ethics officer

VALERIE TACHITAMIS

**Protocol to Screen  
IDEM Office of Legal Counsel's  
Deputy General Counsel Valerie Tachtiris  
from Any Matters Regarding Earthjustice**

Valerie Tachtiris is employed by the Indiana Department of Environmental Management ("IDEM") as a Deputy General Counsel ("DGC") within the Office of Legal Counsel ("OLC"). Her current duties include work as an attorney and co-supervision of other attorneys within OLC.

DGC Tachtiris was contacted by a recruiter and invited to apply a supervising senior attorney position with Earthjustice. Duties for this position include playing leading role in a docket of major environmental cases; collaborating on litigation with other Earthjustice attorneys and staff; developing and maintaining relationships with clients and partners (such as, other nonprofit organizations, environmental justice groups, community-based organizations, labor unions, and Tribes); and supervising associate attorneys, fellows, and litigation assistants in connection with their work on projects. DGC has submitted her application materials to the recruiter.

DGC Tachtiris's interactions with Earthjustice have been primarily through her role as a supervisor. Earthjustice sought administrative review of an air permit and an extension related to that permit issued to the Riverview Energy Corporation in *Objection to the Issuance of PSD/New Source Construction and Part 70 Operating Permit No. T147-39554-0006*, OEA 19-A-J-5073 and *Objection to the Issuance of Permit Amendment No. 147-43258-0006*, OEA A-J-5123. DGC Tachtiris served as supervisors to the attorneys who represented IDEM in those appeals, but did not appear on behalf of IDEM and did not participate directly in the litigation. Related to, but apart from, those cases, DGC Tachtiris and IDEM met with counsel for Riverview and Riverview personnel to discuss a request to extend deadlines in the appealed permit. Earthjustice sent a letter to IDEM's Commissioner related to the request for extension that DGC Tachtiris reviewed and discussed with IDEM staff. Earthjustice has also requested that EPA use its federal authority to overturn IDEM's permitting decisions related to the appealed permit. DGC Tachtiris has reviewed related documents and discussed possible responses with IDEM personnel. To her recollection, DGC Tachtiris has never had any direct contact with anyone from Earthjustice on these matters.

As part of her duties as DGC, Tachtiris also oversees the Office of Records Management. Earthjustice occasionally submits public records requests. DGC Tachtiris has conducted a search and found no currently pending requests for public records from Earthjustice. IDEM recently responded to two routine requests from Earthjustice on September 2 and 6, 2022. Tachtiris reviewed the responses before they were sent. This was prior to receiving communications from the recruiter about the position at Earthjustice.

Therefore, and because of her supervisory role within OLC, IDEM will institute the following protocol to make sure DGC Tachtiris is screened from any potential conflict of interest.

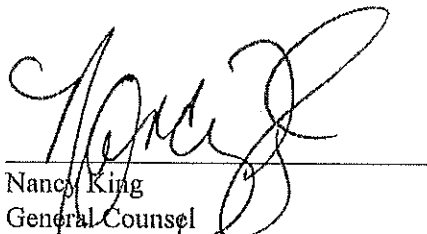
1. General Counsel ("GC") Nancy King is DGC Tachtiris' immediate supervisor. GC King will not assign any current or future matter that may arise involving Earthjustice to DGC Tachtiris.
2. DGC Tachtiris shall recuse herself from the portion of any meeting in which discussions specific to Earthjustice, or any of their clients or interests are discussed or are expected to be discussed.
3. DGC Tachtiris shall not discuss any matter involving Earthjustice or their clients with any other IDEM employee.
4. DGC Tachtiris shall not participate in decisions regarding or relating to Earthjustice or any of their clients.

5. DGC Tachtiris shall not participate in or oversee preparing responses to any public records requests submitted by Earthjustice.
5. DGC Tachtiris shall not access any correspondence or files relating to or involving Earthjustice or their clients. Such documents, if not a matter of public record in IDEM's Virtual File Cabinet, shall be housed with the employee assigned to the matter or kept where DGC Tachtiris does not have access to alter the documents.
6. DGC Tachtiris shall immediately inform her supervisor and IDEM Ethics Officer James French if any provision of this screening protocol is violated.
7. DGC Tachtiris shall follow IC 4-2-6-9(b) and file a written disclosure statement with the State Ethics Commission.
8. All signatories to this screening protocol shall review it within thirty (30) days from the date of the last signature to assure it has been followed and determine if the circumstances have changed to make the protocol no longer necessary.



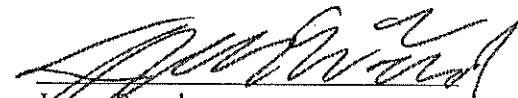
Valerie Tachtiris  
Deputy General Counsel  
Office of Legal Counsel

4 October 2022  
Date



Nancy King  
General Counsel  
Office of Legal Counsel

10/4/22  
Date



James French  
Ethics Officer  
Office of Legal Counsel

10/4/22  
Date

## Baker, Nathaniel P

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**From:** Tachtiris, Valerie  
**Sent:** Tuesday, October 4, 2022 2:08 PM  
**To:** Rockensuess, Brian; Stover, Parvonay (IDEM)  
**Cc:** KING, NANCY; French, James M  
**Subject:** Email to Appointing Authority- Earthjustice Screen  
**Attachments:** Tachtiris Screen and Disclosure.pdf

Hi Brian, I've attached the disclosure statement and screening protocol for my pending application with the recruiter for Earthjustice. Let me know if you have any questions. Thanks!

Valerie



Valerie Tachtiris  
Deputy General Counsel

(317) 234-8884 · [vtachtir@idem.IN.gov](mailto:vtachtir@idem.IN.gov)

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Indiana Department of Environmental Management



