

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

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)	Name (first)		Name (middle)		
Thill	Stephen	(made)			
Name of office or agency		Job title		,	
Indiana Department of Environmental Management		Senior Attorney - Section Chief			
Address of office (number and street)		City ZIP code			
100 N Senate Avenue				46204	
Office telephone number	Office e-mail address (required)				
(317) 233-6864	Sthill@idem.in.gov				
Describe the conflict of interest;					
See attached disclosure and screening protocol.					
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	JUN 0 3 2025				
INDIANA STATE					
	ETHICS COMMISSION				
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Describe the screen established by your ethics officer: (Attach additional pages as needed.)					
See attached disclosure and screening protocol.					
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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)				
SOM	6/3/25				
Printed full name of state officer, employee or special state appointee					
Stephen Thill					
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					
Signature of ethics officer	Date signed (month, day, year)				
the the transfer to the test	6/3/25				
Frinted full name of ethics officer James French					
various reliais					

# Conflict of Interest Disclosure and Protocol to Screen The Indiana Department of Environmental Management's Office of Legal Counsel's Stephen Thill from Any Matters Regarding AES Indiana

Stephen Thill (Thill) is a senior attorney and section chief in the Indiana Department of Environmental Management's (IDEM) Office of Legal Counsel (OLC). Thill's job duties include counsel and representation of IDEM in matters at the administrative level, including enforcement, permitting, remediation, and appeals of agency actions. Thill also advises and supports the Office of Attorney General in non-administrative litigation of IDEM matters. Further, Thill manages a section that currently consists of four staff attorneys also representing IDEM in matters of enforcement, permitting, remediation, and appeals of agency actions.

Thill has recently applied for an associate general counsel position with AES Indiana (AES), an electric power company in the state of Indiana. In this position, Thill would provide counseling to the business on environmental compliance, real estate transactions, and related matters, as well as manage environmental litigation and administrative proceedings. In his position at the State, Thill has historically participated in matters relating to decisions in which AES has a financial interest. Relevant matters Thill has participated in while at IDEM include:

- 1. Advising IDEM Office of Land Quality (OLQ) regarding AES's (then Indianapolis Power & Light (IPL)) rule variance for ash ponds at the Petersburg Generating Station in 2016;
- 2. Advising IDEM OLQ regarding IPL's requested extensions of an interim deadline in the 2016 variance for the Petersburg Generating Station in 2017 and 2018;
- 3. Advising IDEM OLQ regarding IPL's rule variance for an ash pond at the Petersburg Generating Station in 2018;
- 4. Advising a fellow IDEM attorney regarding administrative review of a National Pollutant Discharge Elimination System Permit, issued by IDEM Office of Water Quality, for the Eagle Valley Generating Station in 2023; and
- 5. Advising IDEM OLQ regarding AES's current closure plan for ash ponds at the Eagle Valley Generating Station in November of 2024.

Therefore, per IC 4-2-6-9, IDEM is implementing the following to ensure that Thill is screened from all matters concerning AES.

- 1. IDEM Deputy General Counsel Valerie Tachtiris (DGC Tachtiris) is Thill's direct supervisor. DGC Tachtiris will not assign any current or future matter that may arise involving AES, or any of its clients, to Thill.
- 2. Thill shall recuse himself from the portion of any meeting at IDEM in which there are discussions or expected discussions specific to AES, or in which any of its clients are discussed or are expected to be discussed.
- 3. Thill shall not discuss any matter involving AES, or any of its clients, with any other IDEM employee.

- 4. DGC Tachtiris will notify in writing all employees in her supervisory chain that they are not to discuss any matters involving AES, or any of its clients, with Thill, nor send him any emails concerning AES.
- 5. Thill shall not participate in decisions regarding or relating to AES, or any of its clients.
- 6. Thill shall not access any correspondence or files relating to or involving AES, or any of its clients, either during his hours of work at IDEM or by utilizing State equipment. 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 Thill does not have access to alter the documents.
- 7. Thill shall immediately inform DGC Tachtiris and IDEM Ethics Officer James French if any provision of this screening protocol is violated.
- 8. Thill shall follow IC 4-2-6-9(b) and file a written disclosure statement with the State Ethics Commission.
- 9. All signatories to this screening protocol shall review it within thirty (30) days from the date of the last signature to ensure it has been followed and determine if the circumstances have changed to make the protocol no longer necessary.

Stephen Thill Section Chief

*/(MMM/W/)* Valerie Tachtiris

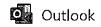
Deputy General Counsel

 $\frac{6/3/2}{Date}$ 

James French

Ethics Officer

Date



## Conflict of Interest Disclosure and Screening Protocol for OLC's Stephen Thill - AES Indiana

From French, James M <JFrench@idem.IN.gov>
Date Tue 6/3/2025 2:39 PM
To Woods, Clint (IDEM Commissioner) <ClintWoods@idem.IN.gov>

1 attachment (1 MB)
Ethics Disclosure and Screen - Thill AES 2025.pdf;

#### Commissioner Woods,

This email serves as notification to the appointing authority per IC 4-2-6-9(b)(2)(D) that IDEM Office of Legal Counsel's Stephen Thill has a potential conflict of interest. Mr. Thill has applied for a position with AES Indiana (AES), an entity regulated by IDEM. Per IC 4-2-6-9, IDEM is instituting the attached to ensure Mr. Thill is screened from any potential conflict of interest with AES. Mr. Thill and I have discussed IC 4-2-6-9, and I instructed him to file a written disclosure to the Office of the Inspector General and to implement a screening protocol here at IDEM, see attached. Mr. Thill's supervisor, Valerie Tachtiris, has been notified of the screening protocol. Please reach out if you have any questions, thanks.

Best, Michael

#### James Michael French

Attorney | IDEM Tel: (317) 234-2170 Email: jfrench@idem.in.gov

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