



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

DEC 12 2017

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) Pace	Name (first) Brian	Name (middle) Andrew
Name of office or agency IDEM		Job title Section Chief (Senior Env. Manager Supervisor 3)
Address of office (number and street) 100 North Senate Avenue		City Indianapolis
		ZIP code 46204-2251
Office telephone number (317) 2328727	Office e-mail address (required) bpace@idem.in.gov	

Describe the conflict of interest:

Mr. Pace is the Excess Liability Trust Fund (ELTF) Section Chief. As such, he is responsible for approving reimbursement claims for leaking underground storage tank (LUST) incidents. Mr. Pace has been approached by a consultant (ECC Horizon), through a recruiting firm (Hobson Associates), regarding possible employment. ECC Horizon is the consultant for three ELTF eligible sites that are in the ELTF program, two of which they have submitted claims to the ELTF program on behalf of their clients for reimbursement.

Kathy Mills, the IDEM Ethics Officer, has been notified and screening profile was drafted

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

See attached.

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)

12/12/17

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

Brian A. Pace

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)

Kathleen Mills

12/11/17

Printed full name of ethics officer

Kathleen Mills

**Protocol
to Screen IDEM Employee Brian Pace
from Any Matters Regarding ECC Horizon**

Mr. Brian Pace is a Senior Environmental Manager Supervisor 3 within the Excess Liability Trust Fund (“ELTF”) Claims Section of the Underground Storage Tank Branch in the Office of Land Quality (“OLQ”) at the Indiana Department of Environmental Management (“IDEM”). Mr. Pace manages a group of employees who review and process claims for reimbursement of the remediation of leaking underground storage tank incidents. Mr. Pace does not review the claims but he is charged with approving the claims.

A recruiting firm, Hobson Associates (“Hobson”), recently contacted Mr. Pace regarding possible employment with an environmental consultant ECC Horizon. ECC Horizon (“ECC”) is the consultant for at least three ELTF eligible sites that are in the ELTF program. ECC has submitted claims for reimbursement for the remediation at two of those sites. The position for which Hobson contacted Mr. Pace is an office management position and is not site/project oriented.

Because ECC Horizon has a financial interest in the reimbursement of those sites, IDEM has instituted the following protocol to screen Mr. Pace from any potential conflict of interest concerning ECC.

1. Douglas Louks is Chief of the Underground Storage Tank Branch and Mr. Pace’s immediate supervisor. Mr. Louks will remove Mr. Pace from participating in any part of the claim assessment and reimbursement process when ECC Horizon has a financial interest.
2. Mr. Louks will assign all future ECC Horizon matters to another employee within the ELTF Claims Section.
3. Mr. Pace shall recuse himself from the portion of any meeting in which discussions specific to ECC Horizon or its clients are discussed or are expected to be discussed.
4. Mr. Pace shall not discuss any matter involving ECC Horizon or its clients with any IDEM employee.
5. Mr. Louks will notify the employees in the ELTF section in writing that they are not to discuss any matter involving ECC Horizon or its clients with Mr. Pace or send him any emails concerning the company or its clients.
6. Mr. Pace shall not access any correspondence or files relating to or involving ECC Horizon or its clients. Such documents shall be housed in the office of the employee assigned to the matter or kept where Mr. Pace does not have access to alter the documents.

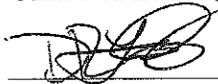
7. Mr. Pace shall not participate in decisions regarding or relating to ECC Horizon or its clients.
8. Mr. Pace shall immediately inform his supervisor and the IDEM Ethics Officer if any provision of this screening protocol is violated.
9. Mr. Pace shall follow IC 4-2-6-9(b) and file a written disclosure statement with the State Ethics Commission.



Brian Pace
Senior Environmental Manager Sup. 3
Excess Liability and Trust Fund Section
Office of Land Quality

12/11/17

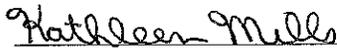
Date



Douglas Louks
Chief Underground Storage Tank Branch
Office of Land Quality

12/11/2017

Date



Kathleen Mills
Ethics Officer
Office of Legal Counsel

12/11/17

Date

MILLS, KATHLEEN

From: Louks, Douglas
Sent: Friday, December 08, 2017 12:21 PM
To: Browne, Rita; Scull, Jeff; Blackburn, Katie; Truax, Lynn; SIMONSON, KATHY; WILLIAMS, RUTH; Patel, Mehul; Rennaker, Colleen; Davis, Brandon; Kreegar, Cynthia; JOHNSON, MARCUS; Pisula, Jodi; Smith, Sandra K; Hayes, Tina
Cc: Pace, Brian A; MILLS, KATHLEEN; Smith, Amy E
Subject: ECC Horizon Claims

All,

Brian was recently contacted about possible employment with the environmental consulting firm ECC Horizon. In accordance with State Ethics laws and the procedures in place to ensure compliance with them, Brian must be screened from any matters regarding ECC Horizon. This includes any claims currently in-house. Brian must be excluded from discussion of any matter relating to ECC Horizon or its clients. Brian should also be prohibited access to any files or correspondence relating to or involving ECC Horizon or its clients. For any such matter, these steps must be followed:

- Katie will make any determination regarding assignment or reassignment of any claim from ECC Horizon of its clients.
- ETLF Staff will save any and all ECC matters *not finalized* on their own H:// Drive and not the shared S://Drive.
- ELTF Staff will transfer digital files noted above via email or in some other manner that prevents access to Brian, not via the S://Drive.
- Any physical files or correspondence are to be hand delivered between staff members and not via shared spaces (i.e. the file cabinet).
- Once an ECC Horizon claim has been Senior QC'ed and finalized, it will be delivered to me for final approval and signature.
- If any questions arise related to ECC Horizon or its clients, those must be elevated to me.

These steps are to effective immediately. Please contact me if you have any questions. Thanks.

Douglas R. Louks
Chief, Underground Storage Tank Branch
Indiana Department of Environmental Management
Office of Land Quality
100 N. Senate Ave.
Indianapolis, IN 46204
Ph: 317.234.5344
dlouks@idem.in.gov