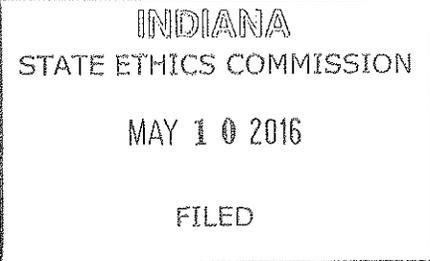




April 28, 2016

Indiana State Ethics Commission
315 W Ohio Street, Room 104
Indianapolis, Indiana 46202



Re: Gift Waiver

Dear Sirs:

Pursuant to 42 Indiana Administrative Code 1-5-1(c) and as the Indiana Department of Natural Resources' ("Department) Ethics Officer, I waive application of 42 IAC 1-5-1 ("the Gift Rule") as applied to Director Cam Clark's ("Clark") attendance and participation at the 2016 Ducks Unlimited Sponsors Event ("Event") to be held on May 6, 2015 in Carmel, Indiana.

Clark has been invited by Ducks Unlimited ("DU") to speak at the Event in his official capacity as the Director of the Department. As part of the Event, there will be a dinner in which Clark will be receiving food and drink. As Clark will be participating in the event in his official capacity as Department Director, more than twenty-five persons have been invited to the Event, and he will be giving a speech to all those convened, the Gift Rule Exception found in 42 IAC 1-5-1(b)(2)(b) is applicable. In the interest of complete transparency and compliance with the Gift Rule, all other parties attending the Event must also pay a registration fee, which would not be covered under the food and drink exception. The registration cost for the Event is approximately \$350.

DU is a worldwide leader in wetlands and waterfowl conservation. Founded in 1937, its primary mission is habitat conservation, which is accomplished via the restoration and management of wetland and grassland habitats. DU's membership in Indiana consists of over 13,000 members whose efforts have led to the conservation of over 27,000 acres in the State. DU works closely with the Department's Fish and Wildlife Division ("Division"), whose mission is to professionally manage Indiana's fish and wildlife for present and future generations, balancing ecological, recreational, and economic benefits. As the Department's Director, Mr. Clark assumes responsibility and oversight for all agency operations.

The Event offers a dinner and fund raising opportunity for DU to support its mission of habitat conservation in Indiana. To that end, registration fees allow individuals to enter into various drawings and to bid on a variety of items and experiences. As part of Mr. Clark attendance, he will not accept any items/experiences that come about from being a drawn winner at the Event, where his entry is part of the registration cost. Clark would still reserve the right to bid on items auctioned at the Event with his own personal funds. No other gifts, favors, services, or any other tangible item has been offered to Clark by DU.

Mr. Clark's attendance at the Event will allow him to gain further insight and education on issues affecting Indiana's wildlife and allow him to act as a representative of the Department if called upon, beyond the planned speaking presentation. Further, as DU and the Division work closely together on

conservation efforts throughout the State, Clark will be able to report on the progress of those efforts, personally thank DU and its individual members, and provide highlights of projects that have received funding from prior DU fund raising efforts. In light of the Department's broad responsibilities as it relates to the oversight and regulatory authority in this area and Clark's position as the Department's Director, it is my opinion that it is in the public interest to issue a waiver of applicability of 42 IAC 1-5-1 in allowing Clark to accept a complementary registration to the Event.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Hoage". The signature is written in a cursive style with a large initial "J" and "H".

Joe Hoage
General Counsel
Department Ethics Officer