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BY: SDaniel

Ms. Susan E. Daniel  
Designated Agency Ethics Official  
International Joint Commission  
United States Section  
2000 L St. NW, Ste. 615  
Washington, D.C. 20036

Dear Ms. Daniel,

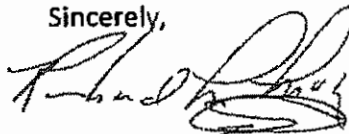
The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner of the International Joint Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b) (1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b) (2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I engage in consulting as a sole proprietor, doing business as Rich Moy's Land and Water Consultants. I have not formed a corporation or other legal entity for this business; instead clients pay me directly. Upon confirmation, I will cease all consulting work. I will not participate personally and substantially in any particular matter involving specific parties in which a former client of mine is a party or represents a party, for a period of one year from the date on which I last provided service to that client, unless I am authorized to participate under 5 C.F.R. § 2635.502(d).

Upon confirmation, I will also resign from my position as Senior Fellow at the University of Montana, Center for Natural Resources and Policy.

Sincerely,



Richard M. Moy