

March 19, 2009

Robert E. Coyle  
Designated Agency Ethics Official  
Department of Homeland Security  
Washington, DC 20528-3650

Dear Mr. Coyle:

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 Administrator, Federal Emergency Management Agency, Department of Homeland Security.

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.

Upon confirmation I will resign from my position of Director, State of Florida Division of Emergency Management. I understand I have a "covered relationship" for a period of one year after my resignation. I understand my participation in particular matters involving specific parties in which the State of Florida is a party or represents a party will be authorized pursuant to 5 C.F.R. § 2635.502(d). This authorization will not extend to any particular matter involving specific parties in which I previously participated in my position as Director.

I will continue to participate in the Florida Retirement System defined benefit plan. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of the State of Florida to provide this contractual benefit 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), such as 5 C.F.R. § 2640.201(c)(2).

My spouse is currently employed by the American Red Cross. Upon my confirmation she will resign. Until she receives final compensation from the American Red Cross, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of the American Red

Cross to pay her final salary, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Sincerely,



William C. Fugate