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September 1, 2011

Via First Class Mail and
E-mail: ncoe@ethics.nv.gov

Nevada Commission on Ethics
704 W. Nye Lane, Suite 204
Carson City, NV 89703

**Re: Jeremy Drew – Lack of Involvement in SCI’s Decision to Participate
in Nevada Bear Hunt Litigation (*NoBearHuntNV.org v. State of Nevada*,
11-186)**

Dear Sir or Madam:

It has come to Safari Club International’s (SCI) attention that questions have been raised about Nevada Board of Wildlife Commissioner Jeremy Drew’s possible involvement in SCI’s decision to participate in the litigation involving the recent litigation over Nevada’s black bear hunt (*NoBearHuntNV.org v. State of Nevada*, 11-186). Mr. Drew has asked SCI to confirm that he did not participate in that decision-making process. This letter explains SCI’s decision-making process in general and what occurred in this case.

SCI makes a decision whether or not to become involved in or initiate litigation through a multiple-step process. When the attorneys in our Hunter Advocacy and Litigation Section become aware of a possible need to participate in litigation, they formulate a recommendation to the Legal Task Force (“LTF”), a group of SCI members who are lawyers, who advise SCI in matters pertaining to SCI’s potential involvement in litigation. I serve as Chairman of the Legal Task Force. Mr. Drew is not a member of the LTF.

At times, to verify that our members have an interest and/or stake in the outcome of litigation, SCI’s litigation staff will poll SCI members who live or recreate in the affected area. Our lawyers use the information they collect to help formulate their recommendations to the LTF. Upon receiving the recommendation of the litigation staff, the LTF then votes on that recommendation. The LTF then shares its recommendation with SCI’s Governmental Affairs Committee (“GAC”), another group of SCI members who deal with a wide range of issues of interest to SCI. I am also a member of the GAC. The GAC then considers the recommendation. If it agrees with the recommendation, it

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passes that recommendation to SCI's Executive Committee ("EC") for a final decision on whether to participate in the litigation. While Mr. Drew was a member of the GAC at the time that SCI decided to participate in the black bear litigation, he did not participate in that decision. Mr. Drew ended his membership in the GAC no later than June 30, 2011. He is not and has never been a member of the Executive Committee.

SCI's Litigation Section began to research the intervention rules in Nevada state court in May 2011, having heard of the possibility that a lawsuit might be filed to challenge the bear hunt. Mr. Drew was not aware of or involved in that legal research. Knowing of our interest in such matters, in this same time period, Mr. Drew was passing along information about the bear hunt to the Litigation Section, the last coming around June 2, 2011. Beginning around June 6, 2011, the Litigation Section also contacted the three SCI members who drew a bear tag to determine whether those members would be willing to help SCI participate in the case, if the decision was made to do so. We learned about the lawsuit shortly after it was filed on June 7, 2011. The Litigation Section began to put together an analysis of the case and recommendation on whether SCI should get involved.

Around June 17, one of the attorneys in the Litigation Section, Mr. Burdin, attempted to contact Mr. Drew to discuss the case. He was unable to contact him over the next couple of days and later learned that Mr. Drew was on a cruise. After Mr. Drew returned from his cruise around June 27, he and Mr. Burdin had a short telephone conversation. In that conversation, Mr. Drew informed Mr. Burdin that Mr. Drew was going to be appointed to the Nevada Board of Wildlife Commissioners, effective July 1, 2011. Mr. Burdin and Mr. Drew agreed that in light of that development, they should not discuss the case and that Mr. Drew would be excluded from further communications between the Litigation Section and the GAC.

On June 27, 2011, the Litigation Section presented its recommendation to the LTF that SCI try to intervene in the Nevada bear hunt litigation. The LTF agreed with that recommendation. On June 28, 2011, the Litigation Section presented the recommendation to the GAC by e-mail. While Mr. Drew normally would receive that recommendation, Mr. Burdin purposefully removed Mr. Drew from the e-mail list. The GAC agreed with the recommendation. Consequently, despite his membership in the GAC until June 30, 2011, Mr. Drew did not receive the information sent to other members of the GAC and did not vote on SCI's participation in the bear litigation, as did the other members of the GAC. On June 29, 2011, SCI President Kevin Anderson approved of SCI's involvement in the case (as the EC was not going to meet in time, the President is authorized to approve involvement in litigation). Mr. Drew was not involved in any part of this process. In addition, the Northern Nevada Chapter of SCI did not request that SCI get involved in this case and did not participate in the decision-making.

Mr. Drew resigned as President and Board Member of the Northern Nevada Chapter of Safari Club International on June 30, 2011. As of July 1, 2011, he is no longer a member of SCI's GAC. Thus, he also has not received any communications regarding

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this case after July 1, 2011, other than possibly e-mail news alerts that are sent to all members of the organization.

I hope this provides the information you need. If you have any questions concerning this letter, please contact me or Anna Seidman, Director of Litigation, Safari Club International 202-543-8733, aseidman@safariclub.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Rew Goodenow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rew Goodenow
Chairman, SCI Legal Task Force

cc: Nevada Board of Wildlife Commissioners