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Apr 20, 2026

DEPARTMENT OF
WATER RESOURCES

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*Attorney for Idaho Forest Group, LLC., Curtis & Lana Carney, R&R Smith Properties
LLC, Gary W. Creagle and Karen B. Creagle 1995 Trust, R&R Smith Family Trust;
Gary Creagle and Ryan & Crystal Smith*

BEFORE THE DEPARTMENT OF WATER RESOURCES OF

THE STATE OF IDAHO

IN THE MATTER OF WATER RIGHT 95-
16448

**DECLARATION OF CLIVE J. STRONG
IN SUPPORT OF PETITION FOR
FORFEITURE OF WATER RIGHT 95-
16448**

I, **Clive J. Strong**, declare as follows:

1. I am over the age of eighteen, and the Attorney for Claimant Idaho Forest Group, LLC, Curtis and Lana Carney, R&R Smith Properties, LLC, Gary W. Creagle and Karen B. Creagle 1995 Trust, R&R Smith Family Trust, Gary Creagle, and Ryan and Crystal Smith.
2. I contracted with DMS Natural Resources to create from publicly available data **Attachment 1** to the Affidavit of Randall Smith in Support of Petition for Forfeiture of Water Right 95-16648 (herein after Randall Smith Affidavit") to show

DECLARATION OF CLIVE J. STRONG IN SUPPORT OF PETITION FOR
FORFEITURE OF WATER RIGHT 95-16448

the location of the water supply system used to deliver Chilco storage water to the lands below Chilco Reservoir and the place of use of and ownership of the decreed irrigation storage rights.

3. I contracted with DMS Natural Resources to create from publicly available data **Attachment 1** to the Affidavit of Curtis B. Carney in Support of Petition for Forfeiture of Water Right 95-16648 (hereinafter "Curtis Carney Affidavit") Chilco storage water to the lands below Chilco Reservoir and the place of use of and ownership of the decreed irrigation storage rights.

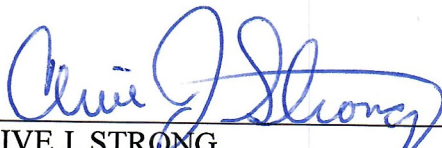
4. I caused to be gathered true, accurate and correct copies of the following documents from the sources identified below:

Attachment 2 to the Randall Smith and Curtis Carney Affidavits: Partial Decree 95-16448 was collected from the Idaho Department of Water Resources 95-16448 water right file.

Attachment 3 to the Randall Smith and Curtis Carney Affidavits: The ownership record for parcel 52N03 W79200 was collected from the records of the Kootenai County Assessor's Office.

I declare under the penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 18th day of April 2026.


CLIVE J. STRONG
ATTORNEY FOR IDAHO FOREST GROUP, LLC,
GARY CREAGLE, GARY W. AND KAREN B.
CREAGLE 1995 TRUST, CURTIS AND LANA

CARNEY, R&R PROPERTIES, LLC, R&R SMITH
TRUST, AND RYAN AND CRYSTAL SMITH

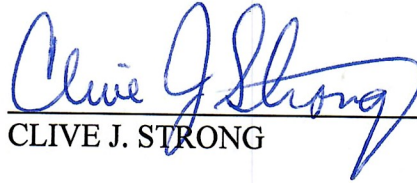
CERTIFICATE OF SERVICE

I certify that on the 18th day of April 2026, I served or caused to be served a copy of this *Declaration of Clive J Strong In Support of Petition for Forfeiture of Water Right 95-16448* to the parties by the following method(s):

Idaho Department of Water Resources
322 E. Front St Ste 648
P.O. Box 83720
Boise, ID 83720-2707

USPS (postage paid)
email file@idwr.idaho.gov

LK Erickson Living Trust
123 Montgomery Rd.
Gillette, WY 82716-9155


CLIVE J. STRONG